

State of Minnesota  
County of Hennepin

District Court  
4th Judicial District

Prosecutor File No. 19A12327  
Court File No. 27-CR-19-24679

---

**State of Minnesota,**

Plaintiff,

vs.

**ABDIRAHMAN MOHAMED FARAH DOB: 08/26/1997**

3945 Lancaster Ln  
#235  
Plymouth, MN 55441

Defendant.

---

**COMPLAINT**

Warrant

The Complainant submits this complaint to the Court and states that there is probable cause to believe Defendant committed the following offense(s):

**COUNT I**

**Charge: Murder - 2nd Degree - With Intent-Not Premeditated**

Minnesota Statute: 609.19.1(1), with reference to: 609.11.5(a), 609.19.1, 609.11.9

Maximum Sentence: 40 YEARS

Offense Level: Felony

Offense Date (on or about): 10/02/2019

Control #(ICR#): 19299459

Charge Description: That on or about 10/2/2019, 2515 Riverside Avenue, City of Minneapolis in Hennepin County, Minnesota, ABDIRAHMAN MOHAMED FARAH, caused the death of Victim 1, a human being, with intent to effect the death of that person or another, but without premeditation, while using a firearm.

Minimum Sentence: 3 YEARS

**COUNT II**

**Charge: Assault-2nd Degree-Dangerous Weapon**

Minnesota Statute: 609.222.1, with reference to: 609.222.1, 609.11.5(a), 609.101.2

Maximum Sentence: 7 YEARS AND/OR \$4,200-\$14,000

Offense Level: Felony

Offense Date (on or about): 10/02/2019

Control #(ICR#): 19299459

Charge Description: That on or about 10/2/2019, 2515 Riverside Avenue, City of Minneapolis in Hennepin County, Minnesota, ABDIRAHMAN MOHAMED FARAH, assaulted Victim while using a firearm.

Minimum Sentence: 3 YEARS

## STATEMENT OF PROBABLE CAUSE

Complainant has investigated the facts and circumstances of this offense and believes the following establishes probable cause:

On or about October 2, 2019, Minneapolis Police and Emergency Medical Services responded to the area of 2515 Riverside Avenue, City of Minneapolis, Hennepin County, Minnesota on a report of a shooting. There, responders located Victim 1, a known adult male, laying on his back in the parking lot with a gunshot wound to his chest. Officers also spoke to Victim 2, a known adult male, who reported that he was also shot and had an apparent gunshot wound on his left leg. Several discharged cartridge casings from firearm ammunition were found in the area.

Victim 1 and Victim 2 were both transported by ambulance to Hennepin County Medical Center. Victim 1 was later pronounced deceased as a result of the gunshot wound to his chest. Victim 2 received treatment for a gunshot wound to his left calf. Victim 2 identified the person who shot both him and Victim 1 was ABDIRAHMAN MOHAMED FARAH, DOB 8/28/1997, Defendant. Victim 2 stated that Defendant was upset that an identified female was with Victim 1 and Victim 2, and that Defendant retrieved a gun and shot both Victim 1 and Victim 2.

The shooting was captured on surveillance video. A known photograph of Defendant matches the appearance of the shooter in the video. The video shows that Defendant, Victim 1, Victim 2, and a person who appears to be an adult female, are speaking to one another before any shooting takes place. It appears that Victim 1 was attempting to de-escalate a conflict when Defendant can be seen retrieving a gun from a parked vehicle. Defendant is seen firing multiple shots at Victim 2 before firing at Victim 1. Defendant then continues to fire at Victim 2 before leaving the scene in a vehicle.

Cell phone tower data indicates that a cell phone associated with Defendant was in the area of the shooting when it occurred. Video shows Defendant using his cell phone prior to the shooting at a time that cell phone records show Defendant's phone was in use. Records indicate the phone was deactivated shortly after the time of the shooting.

Investigators learned that Defendant was attempting to flee the country. Defendant was later arrested at an airport in the state of Connecticut where he remains in custody at the time of the writing of this complaint. Complainant is also aware that there is an active warrant for Defendant's arrest for Second Degree Assault in case 27-CR-19-24405.

A warrant complaint is requested.

## SIGNATURES AND APPROVALS

Complainant requests that Defendant, subject to bail or conditions of release, be:  
(1) arrested or that other lawful steps be taken to obtain Defendant's appearance in court; or  
(2) detained, if already in custody, pending further proceedings; and that said Defendant otherwise be dealt with according to law.

Complainant declares under penalty of perjury that everything stated in this document is true and correct. Minn. Stat. § 358.116; Minn. R. Crim. P. 2.01, subds. 1, 2.

**Complainant**

James R Jensen  
Sergeant  
350 S 5th St  
Minneapolis, MN 55415-1389  
Badge: 3282

Electronically Signed:  
10/04/2019 03:47 PM  
Hennepin County, mn

Being authorized to prosecute the offenses charged, I approve this complaint.

**Prosecuting Attorney**

Kevin Bieging  
300 S 6th St  
Minneapolis, MN 55487  
(612) 348-5550

Electronically Signed:  
10/04/2019 03:31 PM

**FINDING OF PROBABLE CAUSE**

From the above sworn facts, and any supporting affidavits or supplemental sworn testimony, I, the Issuing Officer, have determined that probable cause exists to support, subject to bail or conditions of release where applicable, Defendant's arrest or other lawful steps be taken to obtain Defendant's appearance in court, or Defendant's detention, if already in custody, pending further proceedings. Defendant is therefore charged with the above-stated offense(s).

**SUMMONS**

THEREFORE YOU, THE DEFENDANT, ARE SUMMONED to appear on \_\_\_\_\_, \_\_\_\_\_ at \_\_\_\_\_ AM/PM before the above-named court at the address listed on the attached court summons to answer this complaint.

IF YOU FAIL TO APPEAR in response to this SUMMONS, a WARRANT FOR YOUR ARREST shall be issued.

**WARRANT**

To the Sheriff of the above-named county; or other person authorized to execute this warrant: I order, in the name of the State of Minnesota, that the Defendant be apprehended and arrested without delay and brought promptly before the court (if in session), and if not, before a Judge or Judicial Officer of such court without unnecessary delay, and in any event not later than 36 hours after the arrest or as soon as such Judge or Judicial Officer is available to be dealt with according to law.

*Execute in MN Only*

*Execute Nationwide*

*Execute in Border States*

**ORDER OF DETENTION**

Since the Defendant is already in custody, I order, subject to bail or conditions of release, that the Defendant continue to be detained pending further proceedings.

Bail: \$1,500,000.00

Conditions of Release:

This complaint, duly subscribed and sworn to or signed under penalty of perjury, is issued by the undersigned Judicial Officer as of the following date: October 4, 2019.

**Judicial Officer**

Gina Brandt  
District Court Judge

Electronically Signed: 10/04/2019 03:57 PM

Sworn testimony has been given before the Judicial Officer by the following witnesses:

**COUNTY OF HENNEPIN  
STATE OF MINNESOTA**

**State of Minnesota**

Plaintiff

vs.

**ABDIRAHMAN MOHAMED FARAH**

Defendant

*LAW ENFORCEMENT OFFICER RETURN OF SERVICE  
I hereby Certify and Return that I have served a copy of this Warrant  
upon the Defendant herein named.*

Signature of Authorized Service Agent:

## DEFENDANT FACT SHEET

**Name:** ABDIRAHMAN MOHAMED FARAH  
**DOB:** 08/26/1997  
**Address:** 3945 Lancaster Ln  
#235  
Plymouth, MN 55441

**Alias Names/DOB:**

**SID:**

**Height:**

**Weight:**

**Eye Color:**

**Hair Color:**

**Gender:** MALE

**Race:** Black

**Fingerprints Required per Statute:** Yes

**Fingerprint match to Criminal History Record:** No

**Driver's License #:**

**SILS Person ID #:** 822951

**SILS Tracking No.** 3131473

**Alcohol Concentration:**

## STATUTE AND OFFENSE GRID

Cnt Nbr	Statute Type	Offense Date(s)	Statute Nbrs and Descriptions	Offense Level	MOC	GOC	Controlling Agencies	Case Numbers
1	Charge	10/2/2019	609.19.1(1) Murder - 2nd Degree - With Intent-Not Premeditated	Felony	H2012		MN0271100	19299459
	Modifier	10/2/2019	609.11.9 Minimum Sentences of Imprisonment - Applicable Offenses	No-Level	H2012		MN0271100	19299459
	Penalty	10/2/2019	609.19.1 Murder - 2nd Degree	Felony	H2012		MN0271100	19299459
	Penalty	10/2/2019	609.11.5(a) Minimum Sentences of Imprisonment-Firearm Use or Possession	Felony	H2012		MN0271100	19299459
2	Charge	10/2/2019	609.222.1 Assault-2nd Degree-Dangerous Weapon	Felony	A2222		MN0271100	19299459
	Definition	10/2/2019	609.101.2 Minimum Fines – Victim Assistance Programs	No-Level	A2222		MN0271100	19299459
	Penalty	10/2/2019	609.11.5(a) Minimum Sentences of Imprisonment-Firearm Use or Possession	Felony	A2222		MN0271100	19299459
	Penalty	10/2/2019	609.222.1 Assault-2nd Degree-Dangerous Weapon	Felony	A2222		MN0271100	19299459