Filed in District Court State of Minnesota 09/30/2025

# State of Minnesota County of Hennepin

# **District Court** 4th Judicial District

Prosecutor File No.

25A02480

Court File No.

27-CR-25-5955

State of Minnesota.

COMPLAINT

Plaintiff,

Warrant

VS.

[X] Amended

MOHAMUD HILLOW BULLE DOB: 01/01/1989

1433 7th St E

Minneapolis, MN 55407

Defendant.

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: Criminal Sexual Cond-1st Degree-Penetration - Injury - Use Force/Coerce

Minnesota Statute: 609.342.1(e)(i), with reference to: 609.342.2(a), 609.342.2(b), 609.101.2,

609.342.2(c), 609.3455.10

Maximum Sentence: 30 YEARS AND/OR \$12,000-\$40,000, PLUS CONDITIONAL RELEASE

Offense Level: Felony

Offense Date (on or about): 10/13/2013

Control #(ICR#): 13339876

Charge Description: That on or about 10/13/2013, in Hennepin County, Minnesota, MOHAMUD HILLOW BULLE engaged in sexual penetration with victim, and caused personal injury to her using force or coercion to accomplish sexual penetration.

### **COUNT II**

Charge: Criminal Sexual Cond-1st Degree-Penetration - Injury - Use Force/Coerce

Minnesota Statute: 609.342.1(e)(i), with reference to: 609.342.2(a), 609.342.2(b), 609.17.4(2), 609.101.2,

609.342.2(c), 609.3455.10

Maximum Sentence: 30 YEARS AND/OR \$12,000-\$40,000, PLUS CONDITIONAL RELEASE

Offense Level: Felony

Offense Date (on or about): 10/13/2013

Control #(ICR#): 13339876

Charge Description: That on or about 10/13/2013, in Hennepin County, Minnesota, MOHAMUD HILLOW BULLE attempted to engage in sexual penetration with Victim, and caused personal injury to her using force or coercion to accomplish sexual penetration.

## **COUNT III**

Charge: Kidnapping-To Facilitate Felony or Flight

Minnesota Statute: 609.25.1(2), with reference to: 609.25.2(1), 609.25.2(2)

Maximum Sentence: 40 YEARS AND/OR \$50,000

Offense Level: Felony

Offense Date (on or about): 10/13/2013

Control #(ICR#): 13339876

Charge Description: That on or about 10/13/2013, in Hennepin County, Minnesota, MOHAMUD HILLOW BULLE confined or removed victim from one place to another without her consent, in order to facilitate commission of a felony or flight thereafter, and victim was not released in a safe place.



## STATEMENT OF PROBABLE CAUSE

THE OFFENSE PORTION HAS BEEN AMENDED TO ADD AN ADDITIONAL COUNT OF CRIMINAL SEXUAL CONDUCT IN THE FIRST DEGREE AS COUNT 1, THUS RENUMBERING THE ORIGINAL ATTEMPTED CRIMINAL SEXUAL CONDUCT IN THE FIRST-DEGREE COUNT AS COUNT TWO. THE PROBABLE CAUSE PORTION REMAINS THE SAME.

ON SEPTEMBER 30, 2025, THE OFFENSE PORTION IS AMENDED TO INCLUDE COUNT THREE - KIDNAPPING.

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

On or about October 13, 2013, Minneapolis police officers responded to the report of criminal sexual conduct that occurred in Minneapolis, Hennepin County, Minnesota. Upon arrival, officers spoke with an adult female, Victim herein, who was visibly distraught. Victim stated that earlier that evening she was at an event in Minneapolis, Hennepin County. Victim had been out socializing with friends when she became separated from her group. Victim stated she was approached by an unknown male, later identified as MOHAMMED HILLOW BULLE, Defendant herein, who followed her and offered her his cell phone. Victim was unable to make a call so gave the phone back to Defendant. Defendant then pushed Victim into a ditch in a nearby park. Defendant held Victim down and placed his hands around her neck, impeding her breathing. Defendant pulled off her leggings and underwear and got on top of her. Defendant tried to sexually penetrate her. Defendant eventually got off her and left. Victim was afraid to move so laid there for a few minutes before receiving assistance from a passerby who called 911.

Victim was taken to the Hennepin County Medical Center where a sexual assault examination was conducted. Victim's eyes were swollen, and she suffered a hemorrhage to her left eye. Victim had scratches on her neck, marks and bruises throughout her body, and dirt on her knees. The sexual assault kit, including biological swabs taken from the victim's genital area, was sent to the Bureau of Criminal Apprehension (BCA) for forensic testing.

The Minneapolis Police Department (MPD) returned to the scene and took photographs of the area where Victim was assaulted. The area was muddy, and the grass was matted down. Victim's eyeglasses and shoes were recovered. MPD assigned the case to an investigator but at that time, Victim did not want to move forward, and the case was closed.

In 2020, as part of ongoing efforts to investigate previously untested sexual assault kits, the BCA completed testing on Victim's sexual assault kit and was able to obtain an unidentified major male DNA profile from Victim's perineal and rectal swabs. That profile was entered into the Minnesota and national databases but there were no matches or case associations at that time.

On May 7, 2024, the BCA determined there was a match to the unidentified male DNA profile from Victim's kit to an unknown DNA profile obtained in a 2024 domestic criminal sexual conduct case from St. Paul, Ramsey County, Minnesota. No identification was made at that time.

In October 2024, Defendant was a named suspect in an unrelated attempted murder and assault case in St. Paul, Ramsey County, Minnesota. Through the course of that investigation, Defendant submitted his DNA sample pursuant to a search warrant. The BCA completed forensic testing and determined Defendant's profile matched the previously unidentified male profiles from both Victim's kit and the 2024 domestic criminal sexual conduct case. In the present case, involving Victim, Defendant's DNA match

would not be expected to occur more than once among unrelated individuals in the world population.

On February 26, 2025, an investigator with the Hennepin County Attorney's Office met with Victim, who provided a statement consistent with her initial report from more than ten years earlier. Victim recalled that night she had gone out with her husband and friends to an event in Minneapolis. She stated she left the group she was with and intended to walk around the block. She stated she was approached by a stranger who told her he could help her. Victim stated he would let her use his phone, but she was unable to dial out and he took his phone back. She remembered laying in the mud, while he was trying to rip her clothes off, and she tried to act like she was already dead because it was hard to breathe. She stated he knelt on the backs of her knees, pinning her to the ground. She stated she tried to keep her legs clenched tight and was unsure if he penetrated her or ejaculated. She stated that at some point he got up and left. She laid there on the ground until it was quiet and then went to find help. She stated a man on a bicycle stopped and called the police. She had visible injuries including swelling, broken blood vessels, marks and scratches on her neck and body, and she had to hide herself for weeks until her injuries healed. Victim stated she recalled struggling to find the words to tell her young daughter how a "bad man on the street" had "hurt mommy." Victim confirmed she did not know Defendant and did not have consensual sex with him.

Defendant has a pending Attempted Murder and Second-Degree Assault case in Ramsey County (62-CR-24-6671) and is currently in custody in Ramsey County.

# MINNESOTA JUDICIAL BRANCH

# 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** Dennis Kreft

Dennis Kreft Electronically Signed: Sergeant 09/30/2025 10:40 AM

350 S 5th St

Hennepin County, Minnesota

Minneapolis, MN 55415-1389

Badge: 3867

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

**Prosecuting Attorney** Christina Warren

300 S 6th St

Minneapolis, MN 55487

(612) 348-5550

Electronically Signed: 09/30/2025 10:35 AM

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# FINDING OF PROBABLE CAUSE

determined that probable cause exists to support, subject to be or other lawful steps be taken to obtain Defendant's appears pending further proceedings. Defendant is therefore charged with the control of the control	<b>WONS</b> to appear as directed in the Notice of Hearing before the					
IF YOU FAIL TO APPEAR in response to this SUMMONS, a W	ARRANT FOR YOUR ARREST SHall be issued.					
X WAR	RANT					
of Minnesota, that the Defendant be apprehended and arres	norized to execute this warrant: I order, in the name of the State sted without delay and brought promptly before the court (if in court without unnecessary delay, and in any event not later than officer is available to be dealt with according to law.					
Execute in MN Only  X Execute N	lationwide					
ORDER OF	DETENTION					
Since the Defendant is already in custody, I order, subject to detained pending further proceedings.	bail or conditions of release, that the Defendant continue to be					
Bail: \$150,000.00 Conditions of Release: No Contact with Victim; Remain Law Al	piding					
This complaint, duly subscribed and sworn to or signed under p as of the following date: September 30, 2025.	enalty of perjury, is issued by the undersigned Judicial Officer					
Judicial Officer Shereen Askalani District Court Judge	, 5					
Sworn testimony has been given before the Judicial Officer by t	he following witnesses:					
COUNTY OF HENNEPIN STATE OF MINNESOTA						
State of Minnesota						
Plaintiff vs.	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.					
MOHAMUD HILLOW BULLE  Defendant	Signature of Authorized Service Agent:					

# **DEFENDANT FACT SHEET**

Name:	MOHAMUD HILLOW BULLE
DOB:	01/01/1989
Address:	1433 7th St E Minneapolis, MN 55407
Alias Names/DOB:	
SID:	MN12EZ9536
Height:	
Weight:	
Eye Color:	
Hair Color:	
Gender:	MALE
Race:	Black
Fingerprints Required per Statute:	Yes
Fingerprint match to Criminal History Record:	Yes
Driver's License #:	
SILS Person ID #:	724224
SILS Tracking No	3447510

**Alcohol Concentration:** 

**Case Scheduling Information:** 

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 $9/30/25 \; \text{By}$  request of Attorney of Record, please send directly to Judge Askalani.

# **STATUTE AND OFFENSE GRID**

Cnt Nbr	Statute Type	Offense Date(s)	Statute Nbrs and Descriptions	Offense Level	МОС	GOC	Controlling Agencies	Case Numbers
1	Charge	10/13/2013	609.342.1(e)(i) Criminal Sexual Cond-1st Degree-Penetration - Injury - Use Force/Coerce	Felony	L1587		MN0271100	13339876
	Penalty	10/13/2013	609.342.2(a) Criminal Sexual Conduct-1st Degree-Penalty-Stat Max	Felony	L1587		MN0271100	13339876
	Penalty	10/13/2013	609.342.2(b) Criminal Sexual Conduct-1st Degree-Penalty-Presumptive 144 mo.	Felony	L1587		MN0271100	13339876
	Definition	10/13/2013	609.101.2 Minimum Fines – Victim Assistance Programs	No-Level	L1587		MN0271100	13339876
	Definition	10/13/2013	609.342.2(c) Criminal Sexual Conduct-1st Degree-Subject to conditional release under section 609.3455	No-Level	L1587		MN0271100	13339876
	Definition	10/13/2013	609.3455.10 Dangerous Sex Offenders - Presumptive Executed Sentence for Repeat Sex Offenders	No-Level	L1587		MN0271100	13339876
2	Charge	10/13/2013	609.342.1(e)(i) Criminal Sexual Cond-1st Degree-Penetration - Injury - Use Force/Coerce	Felony	L1587	А	MN0271100	13339876
	Penalty	10/13/2013	609.342.2(a) Criminal Sexual Conduct-1st Degree-Penalty-Stat Max	Felony	L1587	Α	MN0271100	13339876
	Penalty	10/13/2013	609.342.2(b) Criminal Sexual Conduct-1st Degree-Penalty-Presumptive 144 mo.	Felony	L1587	Α	MN0271100	13339876
	Penalty	10/13/2013	609.17.4(2) Anticipatory Crimes-Attempts-Penalty-1/2 Of Intended	Felony	L1587	А	MN0271100	13339876
	Definition	10/13/2013	609.101.2 Minimum Fines – Victim Assistance Programs	No-Level	L1587	Α	MN0271100	13339876
	Definition	10/13/2013	609.342.2(c) Criminal Sexual Conduct-1st Degree-Subject to conditional release under section 609.3455	No-Level	L1587	A	MN0271100	13339876
	Definition	10/13/2013	609.3455.10 Dangerous Sex Offenders - Presumptive Executed Sentence for Repeat Sex Offenders	No-Level	L1587	Α	MN0271100	13339876
3	Charge	10/13/2013	609.25.1(2) Kidnapping-To Facilitate Felony or Flight	Felony	K3253		MN0271100	13339876
	Penalty	10/13/2013	609.25.2(1) Kidnapping-Released in Safe Place-No Great Bodily Harm - Sentence	Felony	K3253		MN0271100	13339876
	Penalty	10/13/2013	609.25.2(2) Kidnap-Not Release Safe Place-Great Bodily Harm or U/16 - Sentence	Felony	K3253		MN0271100	13339876