

State of Minnesota  
County of Blue Earth

District Court  
5th Judicial District

Prosecutor File No.  
Court File No.

BEC-16-1597  
07-CR-16-3903

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**State of Minnesota,**

Plaintiff,

vs.

**MARYAN ABDI HURSHE DOB: 11/14/1995**

2108 York Street  
St. Peter, MN 56082

Defendant.

**COMPLAINT**

Order of Detention

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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: Theft-Take/Drive Motor Vehicle-No Owner Consent**

Minnesota Statute: 609.52.2(a)(17), with reference to: 609.52.3(3)(d)(v)

Maximum Sentence: 10 years and/or \$20,000

Offense Level: Felony

Offense Date (on or about): 10/01/2016

Control #(ICR#): 16029611

Charge Description: Maryan Abdi Hurshe

On or about October 1, 2016, in the County of Blue Earth, said Defendant, Maryan Abdi Hurshe did take or drive a motor vehicle without the consent of the owner or an authorized agent of the owner, knowing or having reason to know that the owner or an authorized agent of the owner did not give consent.

**COUNT II**

**Charge: Traffic - DWI - Operate Motor Vehicle Under Influence of Alcohol**

Minnesota Statute: 169A.20.1(1), with reference to: 169A.27.2

Maximum Sentence: 90 days and/or \$1,000

Offense Level: Misdemeanor

Offense Date (on or about): 10/01/2016

Control #(ICR#): 16029611

Charge Description: Maryan Abdi Hurshe

On or about October 1, 2016, in the County of Blue Earth, said Defendant, Maryan Abdi Hurshe did, drive, operate, or was in physical control of any motor vehicle when he/she was under the influence of alcohol.

### COUNT III

**Charge: Traffic - DWI - Operate Motor Vehicle - Alcohol Concentration 0.08 Within 2 Hours**

Minnesota Statute: 169A.20.1(5), with reference to: 169A.27.2

Maximum Sentence: 90 days and/or \$1,000

Offense Level: Misdemeanor

Offense Date (on or about): 10/01/2016

Control #(ICR#): 16029611

Charge Description: Maryan Abdi Hurshe

On or about October 1, 2016, in the County of Blue Earth, said Defendant, Maryan Abdi Hurshe did, drive, operate, or was in physical control of any motor vehicle, when his/her alcohol concentration at the time, or as measured within two hours of the time, of driving, operating or being in physical control of the motor vehicle was 0.08 or more.

### COUNT IV

**Charge: Traffic Collision - Collision with Unattended Vehicle - Notify Victim or Police**

Minnesota Statute: 169.09.4, with reference to: 169.09.14(c)

Maximum Sentence: 90 days and/or \$1,000

Offense Level: Misdemeanor

Offense Date (on or about): 10/01/2016

Control #(ICR#): 16029611

Charge Description: Maryan Abdi Hurshe

On or about October 1, 2016, in the County of Blue Earth, said Defendant, Maryan Abdi Hurshe did collide with and damage a vehicle which was unattended and failed to immediately stop and either locate and notify the driver or owner of the vehicle of the name and address of the driver and owner of the vehicle striking the unattended vehicle, or report the same to a peace officer, or leave in a conspicuous place in or secured to the vehicle struck a written notice giving the name and address of the driver and owner of the vehicle doing the striking.

### COUNT V

**Charge: Liquor-Consumption by persons under 21**

Minnesota Statute: 340A.503.1(a)(2), with reference to: 340A.703

Maximum Sentence: 90 days and/or \$1,000

Offense Level: Misdemeanor

Offense Date (on or about): 10/01/2016

Control #(ICR#): 16029611

Charge Description: Maryan Abdi Hurshe

On or about October 1, 2016, in the County of Blue Earth, said Defendant, Maryan Abdi Hurshe did, while under the age of 21 years, consume an alcoholic beverage.

### COUNT VI

**Charge: Traffic - Underage drinking and driving; Crime described**

Minnesota Statute: 169A.33.2, with reference to: 169A.33.3

Maximum Sentence: 90 days and/or \$1,000

Offense Level: Misdemeanor

Offense Date (on or about): 10/01/2016

Control #(ICR#): 16029611

Charge Description: Maryan Abdi Hurshe

On or about October 1, 2016, in the County of Blue Earth, said Defendant, Maryan Abdi Hurshe did, while under the age of 21 years, drive, operate, or was in physical control of a motor vehicle while consuming alcoholic beverages, or after having consumed alcoholic beverages while there is physical evidence of the consumption present in the person's body.

### COUNT VII

**Charge: Drivers License-Driving Without a Valid License or Vehicle Class/Type; Multiple Licenses Prohibited**

Minnesota Statute: 171.02.1

Maximum Sentence: 90 days and/or \$1,000

Offense Level: Misdemeanor

Offense Date (on or about): 10/01/2016

Control #(ICR#): 16029611

Charge Description: Maryan Abdi Hurshe

On or about October 1, 2016 in the County of Blue Earth, said Defendant, Maryan Abdi Hurshe did drive a motor vehicle upon a street or highway in this state without a valid driver's license.

## STATEMENT OF PROBABLE CAUSE

On October 1, 2016, at approximately 6:27 a.m., Officer Mohamed Mohamed of the Mankato Department of Public Safety was dispatched to a location in Mankato, Blue Earth County, on the report of a hit-and-run. Officer Mohamed spoke to Victim 1 who stated that he heard a crash outside of his residence. He then came out and saw a vehicle bearing Minnesota license plate 009 UWW hitting his truck and his van and then taking off. Victim 1 stated that the vehicle that hit his truck and van was severely damaged and should not be able to get far from the scene. Officer Mohamed then left the scene in an attempt to locate the vehicle.

While driving in the area, Officer Mohamed found the suspected vehicle at the River Bluff Apartments, upper lot, in Mankato, Blue Earth County. Officer Mohamed made contact with Maryan Abdi Hurshe, D.O.B. 11/14/95; Reem Ibrahim; and Mahdi Ahmed. All three individuals were inside the vehicle at the time the crash occurred. Ibrahim and Ahmed informed Officer Mohamed that Hurshe was the person driving the vehicle when the accident took place.

Officer Mohamed then spoke to Hurshe who stated that she drove the vehicle at the time of the crash and that she had been drinking alcoholic beverages. Officer Mohamed could smell a strong odor of alcohol coming from her mouth. He also observed that her eyes were bloodshot and her speech was slurred. Hurshe then performed poorly on field sobriety tests. Officer Mohamed administered a preliminary breath test, which resulted in a reported value of 0.136.

While processing the vehicle, Officer Mohamed asked that Dispatch send a teletype to the Minneapolis Police Department to make contact with the registered owner of the vehicle Hurshe was driving at the time of the accident. Officer Mohamed received a call from the registered owner of the vehicle who stated that he had reported his vehicle stolen about two weeks ago. The registered owner stated that he reported the stolen vehicle to the Minneapolis Police Department.

Officer Mohamed contacted the Minneapolis Police Department and spoke to an officer who stated that the vehicle being driven by Hurshe was involved in an aggravated robbery in the city. The officer stated that they did not have the vehicle entered as a stolen vehicle at that time. Officer Mohamed inform the officer that he had spoken to the registered owner who stated that he had reported the vehicle stolen approximately two weeks ago.

Officer Mohamed spoke to Hurshe about the stolen vehicle. Hurshe said that she got the vehicle from Ahmed. Ahmed denied knowing or taking the vehicle in question without the owner's permission.

Hurshe was read the Implied Consent Advisory at 8:21 a.m. Hurshe stated that she understood what was read to her and agreed to take a breath test. Hurshe provided a breath sample at 8:49 a.m. that registered at 0.11 alcohol content.

Hurshe did not attempt to make contact with the owner of the vehicle that she hit.

A record check revealed that Hurshe does not currently have a valid Minnesota driver's license.

## 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**

Daniel Schisel  
Police Commander  
710 S Front St  
Mankato, MN 56001-3803  
Badge: 3135

Electronically Signed:  
10/03/2016 04:25 PM  
Blue Earth County, Minnesota

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

**Prosecuting Attorney**

Steven Kelm  
401 Carver Road  
PO Box 3129  
Mankato, MN 56002  
(507) 304-4600

Electronically Signed:  
10/03/2016 03:49 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 401 Carver Rd, Mankato, MN 56002-0347 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: \$  
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 3, 2016.

**Judicial Officer** Krista J Jass  
Judge of District Court

Electronically Signed: 10/03/2016 04:46 PM

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

**COUNTY OF BLUE EARTH  
STATE OF MINNESOTA**

**State of Minnesota**

Plaintiff

vs.

**MARYAN ABDI HURSHE**

Defendant

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

Signature of Authorized Service Agent: