

State of Minnesota  
County of Blue Earth

District Court  
5th Judicial District

Prosecutor File No.  
Court File No.

BEC-16-1122  
07-CR-16-2762

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**State of Minnesota,**  
Plaintiff,

**COMPLAINT**  
Order of Detention

vs.

**ABDINASIR MOHAMED ADEN DOB: 01/01/1992**

114 East Main Street  
Mankato, MN 56001

Defendant.

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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: Criminal Sex Conduct-4th Degree-Force or Coercion**

Minnesota Statute: 609.345.1(c), with reference to: 609.345.2

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

Offense Level: Felony

Offense Date (on or about): 07/07/2016

Control #(ICR#): 16020043

Charge Description: Abdinasir Mohamed Aden Also Known As Abdinasir Mohamed Aden

On or about July 7, 2016, in the County of Blue Earth, said Defendant, Abdinasir Mohamed Aden did engage in sexual contact with another, and the actor used force or coercion to accomplish the sexual contact.

**COUNT II**

**Charge: Stalking - Third or Subsequent Violation in 10 years**

Minnesota Statute: 609.749.4(b)

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

Offense Level: Felony

Offense Date (on or about): 07/07/2016

Control #(ICR#): 16020043

Charge Description: Abdinasir Mohamed Aden Also Known As Abdinasir Mohamed Aden

On or about July 7, 2016, in the County of Blue Earth, said Defendant, Abdinasir Mohamed Aden did, directly or indirectly, or through third parties, manifest a purpose or intent to injure the person, property or rights of another by the commission of an unlawful act; and did so within ten years of the first of two or

more previous qualified domestic violence-related offense convictions or adjudications of delinquency.

### **COUNT III**

**Charge: Threats of Violence-Reckless Disregard Risk**

Minnesota Statute: 609.713.1

Maximum Sentence: 5 years and/or \$10,000

Offense Level: Felony

Offense Date (on or about): 07/07/2016

Control #(ICR#): 16020043

Charge Description: Abdinasir Mohamed Aden Also Known As Abdinasir Mohamed Aden

On or about July 7, 2016, in the County of Blue Earth, said Defendant, Abdinasir Mohamed Aden, did threaten, directly or indirectly, to commit any crime of violence with purpose to terrorize another, or in a reckless disregard of the risk of causing such terror.

## STATEMENT OF PROBABLE CAUSE

Officer Audrey Kranz, a licensed peace officer in the State of Minnesota, currently employed by the Mankato Department of Public Safety, reports that on July 7, 2016, at approximately 4:37 p.m., she learned of a sexual assault which had occurred in the City of Mankato, on July 7, 2016, at approximately 1:00 p.m. Officer Kranz was able to make contact with the individual who had been sexually assaulted, who was identified as Victim1.

Officer Kranz notes that while speaking with Victim1 she noted that Victim 1 appeared to be very upset and was trying not to cry, and Victim1's whole body appeared to be trembling. Victim1 then told Officer Kranz what happened.

Victim1 reported that she had gone outside that day to walk her dog around 1:00 p.m. At which time, she saw two Somalian men on bicycles and one of them stopped and began talking to her while the other one left.

Victim1 reported that she did not know the man, but he continually touched her and tried to hold her hand. Victim1 did not recall everything that he had been saying because she was too focused on trying to get back to her apartment, but she recalled him saying something about making her '20 sandwiches every day if she was with him.'

Victim1 stated she continually pulled her hand out of the male's grasp and told him not to do that because her boyfriend would not like it. Victim1 also reported the male was making her very uncomfortable and she was very nervous. Victim1 stated the man asked for a hug and she did not know how to get away, so she said, 'Okay just one.' Victim1 then reluctantly gave the male a hug. Victim1 stated the male then pressed his middle against her thigh and she could feel his penis against her leg. Officer Kranz then asked Victim1 if she could feel it because it was erect, and Victim1 stated she was not sure, but said she could feel it against her leg.

Victim1 further reported to Officer Kranz that the male then kissed her neck and touched her hair, and she told him no, but he did it anyway. Victim1 then walked toward her apartment to get away from him. Victim1 stated the male then followed her into the entryway of her apartment and 'hugged' her again. At which time, he then groped her buttocks. Victim1 reported she told the male, once again, not to touch her.

Victim1 said she then turned to go up the stairs into her apartment. When she looked back she observed that the male had his hand on the zipper of his pants as if he was going to undo them. Victim1 said the male then told her to wait for another minute. Victim1 was afraid that he was going to take out his penis so she quickly went up the stairs to her apartment and stayed there as she was too afraid to go outside.

Victim1 described the male as just a bit shorter than her, wearing a hat backwards with strange designs on it, facial hair on his chin/jawline, and a light blue long-sleeved dress shirt. Victim1 further stated he also was wearing sunglasses that had orange-colored reflective lenses.

Officer Kranz notes that during the conversation with Victim1 she remained very emotional and her body was visibly trembling. Further, Victim1 made the comment to Officer Kranz that the male had done this in broad daylight in a parking lot and she was terrified wondering what he would have done if it would have been dark out.

Officer Kranz further reports the individual who sexually assaulted Victim1 was later identified as Abdinasir M. Aden.

Aden was positively identified via eyewitnesses and video-recordings and later taken into custody and transferred to Blue Earth County Jail.

Additionally, Officer Kruger, who was the officer who eventually arrested Aden, reports that during the arrest of Aden, he was uncooperative and told the officers, 'Stop touching me, stop touching me, get your hands off of me. I am going to call my brother, Mohamed Mohamed, to shoot you mother fuckers.'

Further, a review of Aden's criminal history reveals at least three qualified domestic violence related offense convictions within the preceding 10 years. Specifically, an adjudication of delinquency for 5th degree assault as reflected in court file 07-JV-09-3297, a conviction for threats of violence as reflected in court file 07-CR-16-1562 (conviction entered, pending sentencing 9/9/16) and lastly, a conviction for stalking as reflected in court file 07-CR-16-5128 (conviction entered, pending sentencing 9/9/16).

## 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:  
07/08/2016 11:29 AM  
Blue Earth County, Minnesota

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

**Prosecuting Attorney**

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

Electronically Signed:  
07/08/2016 11:08 AM

**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: July 8, 2016.

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

Electronically Signed: 07/08/2016 11:38 AM

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.

**ABDINASIR MOHAMED ADEN**

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: