

State of Minnesota  
County of Blue Earth

District Court  
5th Judicial District

Prosecutor File No.  
Court File No.

BEC-16-0643  
07-CR-16-1562

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**State of Minnesota,**  
Plaintiff,

**COMPLAINT**  
Summons

vs.

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

BEC Jail 401 Carver Rd.  
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: 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): 03/08/2016 to 04/15/2016

Control #(ICR#): 16004900

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

On or between March 8, 2016 and April 15, 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.

**COUNT II**

**Charge: Introduce Contraband-Weapon into Jail/Lockup/Prison**

Minnesota Statute: 641.165.2(b)

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

Offense Level: Felony

Offense Date (on or about): 03/08/2016 to 04/15/2016

Control #(ICR#): 16004900

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

On or between March 8, 2016 and April 15, 2016, in the County of Blue Earth, said Defendant, Abdinasir Mohamed Aden did introduce or in any manner causes the introduction of a dangerous weapon, as defined in section 609.02, subdivision 6, into any jail, lockup, or correctional facility, as defined in section

241.021, subdivision 1, without the consent of the person in charge, or is found in possession of a dangerous weapon while within the facility or upon the grounds thereof.

## STATEMENT OF PROBABLE CAUSE

Detective Jerry Billiar, a licensed peace officer in the State of Minnesota, currently employed by the Blue Earth County Sheriff's Office, reports that he was notified by the Blue Earth County Jail of an inmate who had created weapons and had made threats towards jail staff.

Deputy Billiar reports through the investigation he was able to determine that on March 8, 2016, at approximately 10:10 a.m., Custody Officer Thomason reported an inmate identified as Abdinasir M. Aden, had refused to 'lockdown'. Thomason reported Aden hit the glass and said 'fuck you' and showed his two middle fingers Thomason's direction. Afterwards, Aden then stated that he needed clothes. Thomason told him that his out-of-cell hour was up and that he needed to lock in. Inmate Aden then stated he would only lock up if he received his clothes. Thomason stated that it was not a negotiation and he needed to lock in.

Thomason reports Aden then took out a sock, which was filled with clothes and other miscellaneous items and had been soaked in water. Aden hung the sock above his phone and started hitting and kicking it like a punching bag. Aden then proceeded to whip the sock around like a weapon and started hitting the table and glass, making a loud sound. Thomason notes the sock was very heavy and stiff and was designed and used as a weapon.

Thomason further reports that at 12:21 p.m., Inmate Aden asked if he could have some paper towels. Thomason told him that officers don't give out paper towels. Aden then questioned what he had to do if he had to use the restroom. Thomason stated that he would speak with some other officers about the matter. Thomason reports that upon leaving Room C100A, Aden stated 'so you're saying no?' Thomason reports he then stated that he wasn't necessarily saying no but that he had to check into the matter. Aden responded by saying 'hey, I will shoot you' and made hand gestures as if he were aiming a rifle at Thomason. Thomason reports he then left the unit.

Sergeant Robinson reports that on March 8, 2016, at approximately 10:15 a.m., he, along with Sergeant Shoemaker, was doing a review with another inmate in Charlie Unit when they could hear pounding coming from the sub-day room next to where they were located. Robinson and Shoemaker ordered the inmate they were dealing with to lock up and went to investigate.

Robinson and Shoemaker then observed Aden with a sock that had a wet sheet stuck in it that he was swinging and hitting the walls and windows with. Aden was also yelling 'fuck you, fuck America, I'm going to kill you and your fucking families.'

Detective Billiar also learned that on March 31, 2016 at approximately 8:45 a.m., Officer Springer and Officer Sturgis were working in the Quads housing unit. They could hear banging coming from the Charlie housing unit. The officers observed Inmate Aden hitting the glass in the sub-day room and kicking the phone. Springer and Sturgis noted Aden is currently being housed in C104. Aden was out of his cell for his hour from 8:00 to 9:00 a.m. Officer Springer and Officer Sturgis then entered the Charlie housing unit. Springer and Sturgis told Aden that he needed to go back to his cell for being disruptive and trying to destroy jail property. Aden then became more aggressive towards Officer Sturgis and Officer Springer. He was yelling, 'man these phones are not working. I tried to call my lawyer and it cut out.' Springer then told Aden that just because he thought the phone cut out does not give him the right to be disruptive and attempt to destroy jail property. Aden continued to yell at officers. Springer instructed Aden that he needed to go back into his cell several times. After a couple minutes of yelling, Aden finally locked back in his cell.

Springer reports after being locked back in his cell, Aden started kicking at the door repeatedly. He also had been making threats to the officers while they were doing wellbeing checks. Springer reports at

approximately 10:20 a.m., he was doing a wellbeing check and Inmate Aden stated 'come on fucking white boy, open this door.' Springer reports at approximately 11:22 a.m., he was once again doing a wellbeing check in Charlie housing. As he approached C104, Aden stated 'if you come in here and give me a lunch, I will gouge your eyes out.' Aden was then seen raising his spork up to the cell window while he was saying this.

Detective Billiar then learned that on April 1, 2016 at approximately 10:20 a.m., Officer Saleda was conducting a wellbeing check in the Charlie housing unit. As he was checking on Aden in C104, he observed Aden standing on top of his sink. Aden appeared to be rubbing a spork against the fins on the vents. Saleda reports he knows from training and experience that inmates will fashion weapons in this manner to use against staff and other inmates.

Saleda then directed Aden to get off the sink. Aden appeared agitated, as he had been all morning. Aden got down and faced Saleda. He was dressed only in his underwear. In his right hand, Saleda observed a jail spork, the shaft had been sharpened to a very sharp point. Aden had also torn strips from one of the jail towels and had made a handle for the shank. Saleda also observed that Aden had fashioned a couple of 'saps' out of sheets, towels, socks, and t-shirts. He directed Aden to slide the shank under the door; however, Aden became even more agitated and refused to do as directed. Aden then made the statement 'I'm going to come after anyone that comes in here.' Aden also told Saleda 'don't bring me my lunch or I'll come after you.'

Detective Billiar also notes that on April 15, 2016 at approximately 1:21 a.m., Officer Lee was conducting a wellbeing check in C housing unit. As Lee approached Aden's cell, he was pounding on the door. Aden asked if Lee was a sergeant and Lee stated that he was not. Aden then said 'get the fuck away from my door. The next time I see you, I will shoot you.' Lee reports Aden also made a gesture of a gun pointing at him with his right hand.

## 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**

Richard Murry  
Captain  
401 Carver Rd  
Mankato, MN 56002-0228  
Badge: 2708

Electronically Signed:  
04/18/2016 01:02 PM  
Blue Earth County, MN

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:  
04/18/2016 12:35 PM

