

State of Minnesota  
County of Stearns

District Court  
7th Judicial District

Prosecutor File No.  
Court File No.

CR-2020-3054  
73-CR-20-7552

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State of Minnesota,  
Plaintiff,

**COMPLAINT**  
Order of Detention

vs.

**ABDIRAHIN OMAR ALI DOB: 11/29/1998**

[REDACTED]  
[REDACTED]  
St. Cloud, MN [REDACTED]

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: Aiding and Abetting Criminal Sexual Cond-1st Degree-Penetration/Contact - Injury - Use Force/Coerce**

Minnesota Statute: 609.342.1(e)(i), with reference to: 609.342.2(a), 609.05.1

Maximum Sentence: Up to 30 years imprisonment and/or \$40,000 fine.

Offense Level: Felony

Offense Date (on or about): 10/17/2020 to 10/18/2020

Control #(ICR#): 20044071

Charge Description: That the defendant, Abdirahin Omar Ali, then and there being, did wrongfully, unlawfully and intentionally aid, advise, hire, counsel, or conspire with or otherwise procure another to engage in sexual penetration with another person, which caused personal injury to the complainant, and used force or coercion to accomplish the act.

**COUNT II**

**Charge: Criminal Sex Conduct-1st Degree-Penetration - Accomplice Uses/Force/Coerce**

Minnesota Statute: 609.342.1(f)(i), with reference to: 609.342.2(a)

Maximum Sentence: Up to 30 years imprisonment and/or \$40,000 fine.

Offense Level: Felony

Offense Date (on or about): 10/17/2020 to 10/18/2020

Control #(ICR#): 20044071

Charge Description: That the defendant, Abdirahin Omar Ali, then and there being, did wrongfully and unlawfully engage in sexual penetration with another while he was aided or abetted by one or more accomplices within the meaning of Minn. Stat. 609.05, and an accomplice used force or coercion to cause the complainant to submit.

## STATEMENT OF PROBABLE CAUSE

The Complainant states that the following facts establish probable cause:

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On October 18, 2020 at 3:30 AM, officers responded to a reported sexual assault and met with the victim, M.A.C., adult female fully identified in the police reports, near the 700 block of Sixth Avenue South in the City of Saint Cloud, County of Stearns, State of Minnesota.

M.A.C. reported she was just sexually assaulted at a park. Officers transported M.A.C. to Saint Cloud Hospital for a sexual assault exam.

M.A.C. then provided a detailed description of what occurred the prior evening. M.A.C. reported that on October 17, 2020, she went to the Pickled Loon, located in the City of Saint Cloud, County of Stearns, State of Minnesota, with several of her girlfriends. She had consumed alcohol throughout the evening. M.A.C. remembers being at the Pickled Loon for a period of time and then walking down the stairs and out the front door to go outside. The next thing M.A.C. remembers is being in a car with five Somali males. The men were talking to each other in another language which she recognized as Somali. The males were grabbing at her face and trying to kiss her. She tried to push them off of her and told them "no" but the men repeatedly threatened her, called her a "bitch" and told her to "shut the fuck up". The males had a bottle of Hennessy they were passing around and repeatedly attempted to force M.A.C. to drink it.

M.A.C. reported they were in the car for approximately ten minutes and then arrived at a park. M.A.C. did not know which park it was but provided a description of what it looked like. The men continued to threaten to hurt M.A.C. if she did not do what they said. The men led M.A.C. to the playground and threw her on a slide. One of the men, later identified as SAHAL ABDI HASSAN, DOB: 1/1/96, forcefully pulled M.A.C.'s pants and underwear off. M.A.C. tried to hold the waistband of her pants to keep them on, but HASSAN was able to successfully pull them off and vaginally penetrated her with his penis. As the HASSAN raped her, the other males were "encouraging" it. M.A.C. tried telling the males that the police and her friends were coming to get them to stop, but they did not seem to care. M.A.C. said one of her shoes and socks fell off during the assault and was left at the park.

The men then took M.A.C. back to the vehicle and continued to threaten her. One male instructed her to perform oral sex on another male, later identified as ABDIRAHIN OMAR ALI, DOB: 11/29/98, the defendant herein. M.A.C. recalled having her head forced downward. After she was forced to perform oral sex, another one of the males started grabbing M.A.C. by her face again and trying to kiss her.

The next thing M.A.C. remembers is running from the car and up to houses to try to get help. M.A.C. was crying and made contact with a female and described what had just happened. Through the investigation, officers learned the victim made contact at this residence and with her friends at approximately 1:30 A.M. on October 18, 2020. The police were called and then transported M.A.C. to the hospital.

When M.A.C. got to the hospital, she saw that her pants were ripped from the defendant forcibly pulling them off of her. When she removed her pants at the hospital for the sex assault exam, wood chips from the park fell out of her pants. Her underwear was not fully on and fell out of her pants. M.A.C.'s tampon was pushed up inside of her and was removed with forceps by the nurse.

Officers located a shoe matching M.A.C.'s at Haws Park, located at 805 13th Street South in the City of Saint Cloud, County of Stearns, State of Minnesota.

Officers spoke to a bouncer at the Pickled Loon, K.E.G., adult male fully identified in the police reports, who explained he remembered M.A.C. being at the bar on the evening of the assault. He stated M.A.C. was very intoxicated and saw her trip on the stairs on her way out of the bar. He then saw M.A.C. walk over to a dark blue vehicle that looked similar to a Kia Soul with a "longer back end" and speak to someone in the car. He turned away momentarily and when he looked back, M.A.C. and the car were gone.

Officers reviewed surveillance footage from the area around the time frame of the assault and observed a greenish blue Chevrolet HHR which has a longer back end, very similar to a Kia Soul, on surveillance footage at Go For It Gas. The vehicle registers to the ALI. Officers recognized ALI and HASSAN from prior contacts in the surveillance footage as well. ALI and HASSAN repeatedly left and returned to Go For It Gas on October 17, 2020 between 9:00 P.M. and 11:35 P.M. The Chevrolet HHR then returned to Go For It Gas at 1:26 A.M. on October 18, 2020 and officers observed HASSAN on video carrying what appears to be a bottle of Hennessy. This time frame is consistent with the time frame of the assault reported by the victim and other witnesses.

M.A.C. had scratches on her body and a bruise on her right arm from the assault. She did not know any of the five men who assaulted her.

M.A.C.'s sexual assault examination kit for was sent to the BCA for testing. Sperm cell fractions were located on M.A.C.'s facial/lip swab which matched a previously obtained major male DNA profile of ALI. Sperm cell fractions were also located on M.A.C.'s vaginal swabs which matched a previously obtained major male DNA profile of HASSAN.

Investigation is ongoing and the other three suspects remain unidentified.

Complainant has reason to believe and does believe that all of the above information is true and correct.

The above facts constitute your complainant's basis for believing that the above-named defendant, on or between the 17th day of October and the 18th day of October, 2020, in the City of Saint Cloud, County of Stearns, State of Minnesota, committed the offenses described herein.

## 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**

Ryne J Stegura  
Court Officer  
101 11th Avenue N  
St. Cloud, MN 56302

Electronically Signed:  
11/06/2020 07:19 AM  
Stearns County, Minnesota

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

**Prosecuting Attorney**

Jamie R. Reinschmidt  
Assistant County Attorney  
705 Courthouse Square  
St. Cloud, MN 56303  
(320) 656-3880

Electronically Signed:  
11/05/2020 03:55 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 725 Courthouse Square, St. Cloud, MN 56303 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: November 6, 2020.

**Judicial Officer**

William J. Cashman  
District Court Judge

Electronically Signed: 11/06/2020 08:12 AM

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

**COUNTY OF STEARNS  
STATE OF MINNESOTA**

**State of Minnesota**

Plaintiff

vs.

**Abdirahin Omar Ali**

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: