

State of Minnesota
County of Hennepin

District Court
4th Judicial District

Prosecutor File No.
Court File No.

24A10596

State of Minnesota,
Plaintiff,

COMPLAINT
Warrant

vs.

AYALE ABDULLAHI ALI DOB: 01/01/2004

4071 144th St W
Savage, MN 55378

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: Murder - 2nd Degree - With Intent-Not Premeditated

Minnesota Statute: 609.19.1(1), with reference to: 609.11.5(a), 609.19.1

Maximum Sentence: 40 YEARS

Offense Level: Felony

Offense Date (on or about): 05/19/2024

Control #(ICR#): 24135357

Charge Description: That on or about May 19, 2024, in Hennepin County, Minnesota, Ayale Ali, with intent to kill and while using a firearm, caused the death of Victim 1.

Minimum Sentence: 3 YEARS

COUNT II

Charge: Murder - 2nd Degree - With Intent-Not Premeditated

Minnesota Statute: 609.19.1(1), with reference to: 609.11.5(a), 609.17.4(2), 609.19.1

Maximum Sentence: HALF OF, 40 YEARS

Offense Level: Felony

Offense Date (on or about): 05/19/2024

Control #(ICR#): 24135357

Charge Description: That on or about May 19, 2024, in Hennepin County, Minnesota, Ayale Ali, with intent to kill and while using a firearm, attempted to cause the death of Victim 2.

Minimum Sentence: 3 YEARS

COUNT III

Charge: Murder - 2nd Degree - With Intent-Not Premeditated

Minnesota Statute: 609.19.1(1), with reference to: 609.11.5(a), 609.17.4(2), 609.19.1

Maximum Sentence: 40 YEARS

Offense Level: Felony

Offense Date (on or about): 05/19/2024

Control #(ICR#): 24135357

Charge Description: That on or about May 19, 2024, in Hennepin County, Minnesota, Ayale Ali, with intent to kill and while using a firearm, attempted to cause the death of Victim 3.

Minimum Sentence: 3 YEARS

COUNT IV

Charge: Murder - 2nd Degree - With Intent-Not Premeditated

Minnesota Statute: 609.19.1(1), with reference to: 609.11.5(a), 609.17.4(2), 609.19.1

Maximum Sentence: 40 YEARS

Offense Level: Felony

Offense Date (on or about): 05/19/2024

Control #(ICR#): 24135357

Charge Description: That on or about May 19, 2024, in Hennepin County, Minnesota, Ayale Ali, with intent to kill and while using a firearm, attempted to cause the death of Victim 4.

Minimum Sentence: 3 YEARS

COUNT V

Charge: Murder - 2nd Degree - With Intent-Not Premeditated

Minnesota Statute: 609.19.1(1), with reference to: 609.11.5(a), 609.17.4(2), 609.19.1

Maximum Sentence: 40 YEARS

Offense Level: Felony

Offense Date (on or about): 05/19/2024

Control #(ICR#): 24135357

Charge Description: That on or about May 19, 2024, in Hennepin County, Minnesota, Ayale Ali, with intent to kill and while using a firearm, attempted to cause the death of Victim 5.

Minimum Sentence: 3 YEARS

STATEMENT OF PROBABLE CAUSE

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

On or about May 19, 2024, at approximately 9:20 p.m., officers responded to a shooting in the 2900 block alley of 18th Avenue South in Minneapolis, Hennepin County, Minnesota. There, officers encountered five victims. Victim 1, a known adult female, had been shot while seated in the backseat of her vehicle. Victim 1 had been holding Victim 2, her two-year old son, who was also hit by gunfire. Victim 1's other two children, Victims 3 and 4, were in the backseat but not hit. Victim 1 later died from her injuries. Despite being shot in the face, Victim 2 survived.

Officers obtained surveillance video from the alley. It shows that the victims' vehicle parked in the alley behind a home. A known adult male, Victim 5, who is the father of the three children in the car, gets out of the driver's side of the vehicle. Investigators later learned Victim 5 was there to borrow tools from his brother. While Victim 5 is out of the car, another car pulls up behind Victim 5's vehicle.

A man, later identified as Defendant AYALE ABDULLAHI ALI (01/01/2004), gets out of the passenger side of the second vehicle and slowly walks up to the victims' vehicle holding a gun. Defendant then fires multiple shots into the vehicle. After a few seconds, Victim 5 returns to the car, sees his wife and child have been shot, and starts screaming. At that point, Defendant shoots at Victim 5, but does not hit him.

Officers recovered seven 9mm discharged cartridge cases from the scene and the crime lab later determined they were all fired from the same firearm.

Investigators learned from multiple witnesses that Defendant might be the shooter. After obtaining search warrants for Defendant's social media accounts, investigators obtained numerous pictures of Defendant holding guns. They also found messages in which Defendant is trying to trade firearms 24 hours after the murder. Investigators learned Defendant's current phone number and obtained its cell site location data. Defendant's phone was at the scene of the murder when it occurred.

After investigators learned this information, they presented witnesses with photo lineups containing Defendant's picture. At least two witnesses identified Defendant. Additionally, investigators obtained a selfie of Defendant at a gas station taken a few hours before the shooting. In the photo, Defendant appears to be wearing the same shoes as the shooter in the surveillance footage.

Defendant has a history of violence. He is on probation in Scott County for aggravated robbery (70-CR-20-13664) and has faced significant charges in Iowa, including a home invasion / attempted murder. Investigators have recovered communications in which Defendant brags about fleeing to Somalia after some of those charges. As such, he presents a unique public safety and flight risk and your complainant requests \$2,000,000 bail.

The State will seek an aggravated sentence based on this murder occurring in the presence of children.

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

Mark Suchta
Sergeant
350 S 5th St
Minneapolis, MN 55415-1389
Badge: 6995

Electronically Signed:
09/25/2024 10:17 AM
Hennepin County, suchtmj0

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

Prosecuting Attorney

Patrick Lofton
Assistant County Attorney
300 S 6th St
Minneapolis, MN 55487
(612) 348-5550

Electronically Signed:
09/25/2024 10:13 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 as directed in the Notice of Hearing before the above-named court 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*

☒ *This warrant may be executed at any time of the day or night and on Sundays or legal holidays.*

☐ 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: \$2,000,000.00

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: September 25, 2024.

Judicial Officer

Kerry Meyer
District Court Judge

Electronically Signed: 09/25/2024 10:30 AM

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

COUNTY OF HENNEPIN
STATE OF MINNESOTA

State of Minnesota

Plaintiff

vs.

Ayale Abdullahi Ali

Defendant

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.

Signature of Authorized Service Agent:

DEFENDANT FACT SHEET

Name: Ayale Abdullahi Ali
DOB: 01/01/2004
Address: 4071 144th St W
Savage, MN 55378

Alias Names/DOB: Ayale Abdullahi Abdi DOB: 1/1/2004
Ayale Ali DOB:
Ayale Ali Abdullahi DOB: 1/4/2004
AYALE ABDULAHHI ALI DOB: 1/1/2004

SID:
Height:
Weight:
Eye Color:
Hair Color:
Gender: MALE
Race: Black
Fingerprints Required per Statute: Yes
Fingerprint match to Criminal History Record: No
Driver's License #:
SILS Person ID #: 848117
SILS Tracking No. 3420157
Alcohol Concentration:

STATUTE AND OFFENSE GRID

Cnt Nbr	Statute Type	Offense Date(s)	Statute Nbrs and Descriptions	Offense Level	MOC	GOC	Controlling Agencies	Case Numbers
1	Charge	5/19/2024	609.19.1(1) Murder - 2nd Degree - With Intent-Not Premeditated	Felony	H2013		MN0271100	24135357
	Penalty	5/19/2024	609.11.5(a) Minimum Sentences of Imprisonment-Firearm Use or Possession	Felony	H2013		MN0271100	24135357
	Penalty	5/19/2024	609.19.1 Murder - 2nd Degree	Felony	H2013		MN0271100	24135357
2	Charge	5/19/2024	609.19.1(1) Murder - 2nd Degree - With Intent-Not Premeditated	Felony	H1023	A	MN0271100	24135357
	Penalty	5/19/2024	609.11.5(a) Minimum Sentences of Imprisonment-Firearm Use or Possession	Felony	H1023	A	MN0271100	24135357
	Penalty	5/19/2024	609.17.4(2) Anticipatory Crimes-Attempts-Penalty-1/2 Of Intended	Felony	H1023	A	MN0271100	24135357
	Penalty	5/19/2024	609.19.1 Murder - 2nd Degree	Felony	H1023	A	MN0271100	24135357
3	Charge	5/19/2024	609.19.1(1) Murder - 2nd Degree - With Intent-Not Premeditated	Felony	H1023	A	MN0271100	24135357
	Penalty	5/19/2024	609.11.5(a) Minimum Sentences of Imprisonment-Firearm Use or Possession	Felony	H1023	A	MN0271100	24135357
	Penalty	5/19/2024	609.17.4(2) Anticipatory Crimes-Attempts-Penalty-1/2 Of Intended	Felony	H1023	A	MN0271100	24135357
	Penalty	5/19/2024	609.19.1 Murder - 2nd Degree	Felony	H1023	A	MN0271100	24135357
4	Charge	5/19/2024	609.19.1(1) Murder - 2nd Degree - With Intent-Not Premeditated	Felony	H1023	A	MN0271100	24135357
	Penalty	5/19/2024	609.11.5(a) Minimum Sentences of Imprisonment-Firearm Use or Possession	Felony	H1023	A	MN0271100	24135357
	Penalty	5/19/2024	609.17.4(2) Anticipatory Crimes-Attempts-Penalty-1/2 Of Intended	Felony	H1023	A	MN0271100	24135357
	Penalty	5/19/2024	609.19.1 Murder - 2nd Degree	Felony	H1023	A	MN0271100	24135357
5	Charge	5/19/2024	609.19.1(1) Murder - 2nd Degree - With Intent-Not Premeditated	Felony	H1023	A	MN0271100	24135357
	Penalty	5/19/2024	609.11.5(a) Minimum Sentences of Imprisonment-Firearm Use or Possession	Felony	H1023	A	MN0271100	24135357
	Penalty	5/19/2024	609.17.4(2) Anticipatory Crimes-Attempts-Penalty-1/2 Of Intended	Felony	H1023	A	MN0271100	24135357
	Penalty	5/19/2024	609.19.1 Murder - 2nd Degree	Felony	H1023	A	MN0271100	24135357