

**IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI  
AT KANSAS CITY**

<b>POLICE NO. :</b>	KC23016160
<b>PROSECUTOR NO. :</b>	095473820
<b>OCN:</b>	

<b>STATE OF MISSOURI,</b>	)	
	)	
<b>PLAINTIFF,</b>	)	
	)	
<b>vs.</b>	)	
	)	
<b>IBRAHIM ABDIKARIM SHARIF AHMED</b>	)	
<b>7715 North Mercier Street</b>	)	<b>CASE NO. 2316-CR</b>
<b>Kansas City, MO 64118</b>	)	<b>DIVISION</b>
<b>DOB: 02/01/1985</b>	)	
<b>Race/Sex: B/M</b>	)	
	)	
	)	
<b>DEFENDANT.</b>	)	

**COMPLAINT**  
**WARRANT REQUESTED**

**Count I. Murder 2nd Degree (565.021-001Y20200903.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.021, RSMo, committed the class A felony of murder in the second degree, punishable upon conviction under Section 558.011, RSMo, in that on or about on or about March 15, 2023, in the County of Jackson, State of Missouri, the defendant with the purpose of causing serious physical injury to Abdullahi Yussuf, caused the death of Abdullahi Yussuf by shooting him.

An individual convicted and sentenced for this offense shall not be eligible for parole until eighty-five percent of the sentence is served.

The range of punishment for a class A felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than ten (10) years and not to exceed thirty (30) years, or life imprisonment.

**Count II. Armed Criminal Action (571.015-001Y20205213.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 571.015, RSMo, committed the felony of armed criminal action, punishable upon conviction under Section 571.015.1, RSMo, in that on or about on or about March 15, 2023, in the County of Jackson,

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State of Missouri, the defendant committed the felony of murder in the second degree charged in Count 1, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of murder in the second degree by, with and through, the knowing use, assistance and aid of a deadly weapon.

The punishment imposed pursuant to Section 571.015, RSMo shall be in addition to and consecutive to any punishment provided by law for the crime committed by, with, or through the use, assistance, or aid of a dangerous instrument or deadly weapon. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015.1, RSMo. is imprisonment by the department of corrections for a term of not less than three years and not to exceed fifteen years, unless the person is unlawfully possessing a firearm, in which case the term of imprisonment shall be for a term of not less than five years. No person convicted under this subsection shall be eligible for parole, probation, conditional release, or suspended imposition or execution of sentence for a period of three calendar years. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015.2, RSMo. as a second offense is imprisonment by the department of corrections for a term of not less than five years and not to exceed thirty years, unless the person is unlawfully possessing a firearm, in which case the term of imprisonment shall be for a term not less than fifteen years. No person convicted under this subsection shall be eligible for parole, probation, conditional release, or suspended imposition or execution of sentence for a period of five calendar years. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015.3, RSMo. as a third offense is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than ten (10) years without eligibility for parole, probation, conditional release or suspended imposition or execution of sentence for a period of ten (10) calendar years.

### **Count III. Unlawful Use Of Weapon - Subsection 9 - Shoot At/From Motor Vehicle, At Person, Motor Vehicle Or Building (571.030-020Y20205213.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of in violation of Section 571.030, RSMo, committed the class B Felony of unlawful use of a weapon, punishable upon conviction under Sections 558.011 and 571.030.9, RSMo, in that on or about March 15, 2023, at Independence Ave and Olive Street, in the County of Jackson, State of Missouri, the defendant, knowingly discharged a firearm from a Dodge Challenger, a motor vehicle.

The range of punishment for a class B felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than five (5) years and not to exceed fifteen (15) years.

### **Count IV. Armed Criminal Action (571.015-001Y20205213.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 571.015, RSMo, committed the felony of armed criminal action, punishable upon conviction under Section

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571.015.1, RSMo, in that on or about on or about March 15, 2023, in the County of Jackson, State of Missouri, the defendant committed the felony of unlawful use of a weapon, charged in Count 3, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of unlawful use of a weapon by, with and through, the knowing use, assistance and aid of a deadly weapon.

The punishment imposed pursuant to Section 571.015, RSMo shall be in addition to and consecutive to any punishment provided by law for the crime committed by, with, or through the use, assistance, or aid of a dangerous instrument or deadly weapon. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015.1, RSMo. is imprisonment by the department of corrections for a term of not less than three years and not to exceed fifteen years, unless the person is unlawfully possessing a firearm, in which case the term of imprisonment shall be for a term of not less than five years. No person convicted under this subsection shall be eligible for parole, probation, conditional release, or suspended imposition or execution of sentence for a period of three calendar years. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015.2, RSMo. as a second offense is imprisonment by the department of corrections for a term of not less than five years and not to exceed thirty years, unless the person is unlawfully possessing a firearm, in which case the term of imprisonment shall be for a term not less than fifteen years. No person convicted under this subsection shall be eligible for parole, probation, conditional release, or suspended imposition or execution of sentence for a period of five calendar years. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015.3, RSMo. as a third offense is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than ten (10) years without eligibility for parole, probation, conditional release or suspended imposition or execution of sentence for a period of ten (10) calendar years.

The facts that form the basis for this information and belief are contained in the statement(s) of facts filed contemporaneously herewith, made a part hereof, and submitted as a basis upon which this court may find the existence of probable cause.

Wherefore, the Prosecuting Attorney prays that an arrest warrant be issued as provided by law.

**JEAN PETERS BAKER**  
Prosecuting Attorney  
Jackson County, Missouri  
by,

/s/ Hallie L. Schuman  
Hallie L. Schuman (#66333)  
Assistant Prosecuting Attorney  
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**State vs. Ibrahim Abdikarim Sharif Ahmed**

**WITNESSES:**

1. DET Jonathan E. Cook, 1125 Locust, Kansas City, MO 64106
2. DET Joshua M. Gantt, 1125 Locust, Kansas City, MO 64106
3. [REDACTED]  
[REDACTED] St, Floor 11, Kansas City, MO 64106
6. PO Alexa Tarwater, 1125 Locust, Kansas City, MO 64106

**PROBABLE CAUSE STATEMENT FORM**

Date: 03-16-2023

CRN: KC23016160

I, Detective Josh Gantt # 5772, of the Kansas City, Missouri Police Department  
(Name and identify law enforcement officer, or person having information as probable cause.)

knowing that false statements on this form are punishable by law, state that the facts contained herein are true.

I have probable cause to believe that on 03-15-2023, at Independence Avenue / Olive in  
(Date) (Address)

Kansas City, Jackson Missouri Ibrahim A. Sharif Ahmed  
(County) (Name of Offender(s))

a black male born on 02-01-1985 committed one or more criminal offense(s).  
(Description of Identity)

The facts supporting this belief are as follows:

On 03-15-2023, at approximately 2054 hours, officers of the Kansas City Missouri Police Department (KCPD) were dispatched to Independence Avenue and Garfield Avenue, Kansas City, Jackson County, Missouri on a reported Event with EMS. As responding officers arrived on scene, pedestrians near Independence Avenue and Olive Street began waving at officers to get their attention.

Officers arriving at Independence Avenue and Olive Street made contact with [REDACTED] (witness) who stated he observed a red/orange Dodge Challenger/Charger driving westbound on Independence Avenue. [REDACTED] stated his attention was drawn to the vehicle because he observed the driver shoving someone from the Dodge as the vehicle was in motion. [REDACTED] stated that after an occupant was dumped onto Independence Avenue, he observed the Dodge drive toward the area of construction (believed to be eastbound towards Prospect Avenue); [REDACTED] lost sight of the vehicle and called 911.

KCPD responded to the scene and located an unresponsive black male (later identified as AY) laying on the street near the aforementioned intersection. Personnel from the Kansas City, Missouri Fire Department (EMS) also responded to the scene; they transported the victim to University Health Truman Medical Center where he was later pronounced deceased at 2123 hours.

KCPD analysts were able to utilize area cameras to view the aforementioned Dodge and obtain license plate information; the listed license plate was ZH0H9W-Missouri. Officers conducted a computer check of the license plate which responded back on a 2008 BMW to Ibrahim Sharif. An additional search of Ibrahim revealed a DOR address of 7715 N Mercier for Ibrahim Sharif Ahmed B/M 02-01-1985; with the DOR information, KCPD officers responded to that address. While en route to the DOR address, KCPD officers

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located the red Dodge Challenger bearing Missouri plate ZH0H9W near the intersection of NW 77th Street and North Holly, Kansas City, Clay County, Missouri. KCPD officers conducted a car check in regard and took the driver, and sole occupant, into custody; the driver was identified as Sharif-Ahmed and narcotics were found on his person at the time of his arrest. Sharif-Ahmed was transported from the area of the car check and taken to the Shoal Creek Patrol Detention. The vehicle was later towed to the City Tow for processing.

Detectives completed an application for a search warrant through the Circuit Court of Clay County, Missouri. On 03/15/2023, detectives received the signed search warrant and on 03/16/2023, at 1200 hours, detectives responded to 7750 E Front Street (City Tow Lot) to execute the search warrant. Upon arrival at the City Tow Lot, the red Dodge Challenger (Hold#108619) was observed in the Tow Lot garage bay bearing Missouri license ZH0H9W with a VIN of 2B3CJ4DV9AH208402. The listed vehicle appeared to have damage to the rear passenger side bumper and trunk lid. KCPD CSI technicians responded to the City Tow Lot and processed the vehicle. Several S&B 45auto spent shell casings were located inside the vehicle (on the front and rear floor board, as well as the front and rear passenger seats. Several S&B 45 auto live rounds were located in the center console and on front floor board. A black extended "Pro Mag" firearm magazine (loaded with 28 S&B 45 auto live rounds) was found underneath the front driver's seat. The passenger's side door and center console had apparent blood which was also on the rear floor board. Several loose "Moore" cigarettes were found in center console along with a baggie containing a green leafy substance. A bottle containing an unknown liquid was also located in the center console of the vehicle. A black Samsung Galaxy cellphone was located in the front driver's side door. All items were recovered as evidence.

Detectives made contact with a witness ( ) who stated that she was sitting in the red Dodge Challenger during the incident. identified the occupants of the Challenger as "Ibrahim" (driver), "Waylo" (front seat passenger) and . Prior to the incident, at approximately 1900 hours, the four parties drove to the McDonald's located on Independence Avenue. After leaving the McDonald's, stated was dropped off at her residence in a nearby apartment complex; while dropping off, noticed Ibrahim was outside smoking (as he was known to smoke PCP). further stated as they left's residence, Ibrahim continued driving on Independence Avenue, at which time "Waylo" told Ibrahim to be careful as he was "messing up the car". stated Ibrahim told "Waylo" the vehicle was okay and as she looked down to finish a text message, heard five (5) shots come from within the car. stated her ears were ringing from the gunshots and as she looked up, she observed "Waylo" with apparent blood on his face. stated they were still on Independence Avenue (located in Kansas City, Jackson County, Missouri) approximately one minute (drive time) away from's apartment complex. While driving, Ibrahim began telling to get the passenger out of his car. Afraid that Ibrahim would shoot her, J complied and assisted with pushing "Waylo" from the vehicle as they continued travelling on Independence Avenue.

stated Ibrahim continued to drive on Armour Road (in North Kansas City) and she asked Ibrahim if he could take her to her apartment; at some point on the way to the apartment, Ibrahim stopped and fired additional shots through the passenger window. Not wanting to give Ibrahim her exact address, advised for Ibrahim to stop at the complex and she would walk to her apartment. Ibrahim stopped in the area of some the apartments in Kansas City and exiting the Challenger. ran from the vehicle and notified police.

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Using the information provided by [REDACTED], KCPD detectives located [REDACTED] and spoke with her in regard to the incident. During her statement, [REDACTED] advised that prior to the incident she and [REDACTED] were together at her ([REDACTED] apartment. Sometime later that evening, [REDACTED]'s friend (Waylo) called her through Snapchat. During their conversation, [REDACTED] learned that a friend named Ibrahim was with Waylo. Ibrahim and [REDACTED] had been "talking" for sometime and when he learned that she was at [REDACTED]'s apartment they all decided to meet at that location. Sometime before 2000 hours (03-15-2023), Ibrahim and Waylo arrived at [REDACTED] apartment. Ibrahim then drove the four of them in his red Dodge Challenger. Ibrahim first stopped at the Mini Mart (possibly located at 3701 St. John Avenue) where he bought some gas. While there, Ibrahim brandished a black handgun; at that time, Ibrahim did not threaten anyone with the firearm and when [REDACTED] asked him about it, he identified it as a Glock 27. From the gas station, Ibrahim drove them to a McDonald's restaurant (possibly located at 5347 Independence Avenue) where he used a card to buy everyone's meal. [REDACTED] advised that Ibrahim was acting "weird" by continually laughing like a child. They did not stop at any other locations and as they returned to [REDACTED]'s apartment, she could see and smell Ibrahim smoking "wet" (PCP dipped cigarettes). At that time, Waylo was seated in the front passenger's seat, DJ was seated behind him, and SJ was seated behind Ibrahim; from her seat, it appeared that Waylo was upset and he did not speak much.

After being dropped off at her apartment, [REDACTED] observed Ibrahim, Waylo, and [REDACTED] leave in Ibrahim's Challenger; she advised that she did not have any further contact with them that evening.

Detectives responded to the Metro Patrol Detention to speak with Sharif-Ahmed about the incident. Prior to obtaining his statement, detectives read Sharif Ahmed his Miranda Warning; after acknowledging that he understood his rights, the interview continued.

During his statement, Sharif Ahmed advised that prior to the incident he drove two friends of his to get food at the McDonalds on Independence Avenue; Sharif Ahmed was able to identify those friends ([REDACTED] and Waylo). After getting food, Waylo and [REDACTED] smoked some "weed" (marijuana) that Sharif Ahmed had. At some point during their ride, Sharif Ahmed became possessed through voodoo and he lost his ability to recall what exactly transpired. At the time, Sharif Ahmed was in possession of a .45 caliber (Springfield) XD and he believed it to be in the center console of his vehicle. Sharif Ahmed advised that he bought the firearm from an unknown individual approximately two weeks prior and paid \$600 for it; Sharif Ahmed said that he bought the firearm because multiple people were after him.

During the ride, Waylo asked about the gun and somehow it became present out in the cab of the vehicle. Sharif Ahmed could not recall what happened but offered the possibility that either he shot Waylo, [REDACTED] shot Waylo, or Waylo shot himself.

Sharif Ahmed said that he remembered there that was a lot of blood in his car, but he did not offer any further details. After Waylo was shot, he drove [REDACTED] to her apartment and dropped her off. Sharif Ahmed said that he drove around until his head cleared and then he drove to the area of his house where the police contacted him. Sharif Ahmed refused to divulge what happened to the firearm after the shooting.

At the conclusion of the interview, Sharif Ahmed was returned to a detention cell.

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Printed Name Det. Josh Gantt - 5772 Signature /s/ Det. Josh Gantt #5772

The Court finds probable cause and directs the issuance of a warrant this \_\_\_\_\_ day of \_\_\_\_\_.

\_\_\_\_\_  
Judge

Circuit Court of \_\_\_\_\_ County, State of Missouri.