

State of Missouri, the defendant committed the felony of Assault in the First Degree charged in Count I, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of Assault in the First 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, Resulting In Death Or Injury (571.030-015Y20205213.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 571.030.1(9), RSMo, committed the class A 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 2, 2024, at E 9TH ST and WOODLAND AVE, in the County of Jackson, State of Missouri, the defendant, knowingly discharged a firearm from a Maroon 2012 Nissan Murano, a motor vehicle, and, as a result of the above described conduct, [REDACTED] suffered injury or death.

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 IV. Unlawful Possession Of A Firearm (571.070-001Y20205212.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 571.070, RSMo,

committed the class D felony of unlawful possession of a firearm, punishable under Sections 558.011 and 558.002, RSMo, in that on or about March 2, 2024, in the County of Jackson, State of Missouri, the defendant knowingly possessed a FNH .223 Rifle, a firearm, and on January 11, 2023, the defendant was convicted of the felony of Assault in the Second Degree in the Circuit Court of Jackson County, Missouri.

The range punishment for a class D felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than one (1) year and not to exceed seven (7) years; or by imprisonment for a special term not to exceed one (1) year in the county jail or other authorized penal institution; or by a fine not to exceed ten thousand dollars (\$10,000); or by both imprisonment and a fine. If money or property has been gained through the commission of the crime, any fine imposed may be not more than double the amount of the offender's gain from the commission of the crime.

Count V. Resisting Arrest/Detention/Stop By Fleeing - Creating A Substantial Risk Of Serious Injury/Death To Any Person (575.150-002Y20204801.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 575.150, RSMo, committed the **class E felony of resisting a lawful stop**, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about on or about March 2, 2024, in the County of Jackson, State of Missouri, a law enforcement officer, was attempting to make a lawful stop of a vehicle being operated by defendant, and the defendant knew or reasonably should have known that the officer was making a lawful stop, and, for the purpose of preventing the officer from effecting the stop, resisted the stop of defendant by fleeing from the officer and defendant fled in such a manner that created a substantial risk of serious physical injury or death to other persons in that defendant operated a motor vehicle on city streets at speeds up to 100 mph.

The range punishment for a class E felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than one (1) year and not to exceed four (4) years; or by imprisonment for a special term not to exceed one (1) year in the county jail or other authorized penal institution; or by a fine not to exceed ten thousand dollars (\$10,000); or by both imprisonment and a fine. If money or property has been gained through the commission of the crime, any fine imposed may be not more than double the amount of the offender's gain from the commission of the crime.

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/ Clayton O Whitworth
Clayton O Whitworth (#69780)
Assistant Prosecuting Attorney
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WITNESSES:

The State's witnesses as of 3/3/2024 are included on the "State's Witness List" filed contemporaneously with this Complaint.

PROBABLE CAUSE STATEMENT FORMDate: 03/02/2024CRN: 24013598
24013604

I, Detective Sanders #5798, Kansas City Missouri Police Department, Assault Squad Unit
(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 03/02/2024, at E 9th Street and Woodland Avenue in
(Date) (Address)

Kansas City, Jackson Missouri Abdisalaan H. Muhamud
(County) (Name of Offender(s))

B/M committed one or more criminal offense(s).
(Description of Identity)

Aggravated Assault
Resisting Arrest
Eluding
FIP

The facts supporting this belief are as follows:

On 03/02/2024, at 1209 hours, officers with the Kansas City Missouri Police Department were dispatched to
[REDACTED], regarding a shooting.

Upon arrival, officers contacted Victim #1 who stated he had been shot in the area of E 9th Street and Woodland Avenue, Kansas City, Jackson County, Missouri, when a red van pulled up next to him, leaned out of the window with a rifle and began firing into the driver's door of the victim's vehicle. The officers observed the victim to have multiple apparent gunshot wounds to the abdomen. Victim #1 was transported to a nearby hospital for treatment. Officers responded to the area of E 9th Street and Woodland Avenue, where they located broken glass in the street, on E 9th Street, just west of the intersection. They were contacted by unrelated victims that stated a bullet entered their residence. They did not witness anything but several victims were inside of residence at the time the shot entered the residence.

Simultaneously, officers in the area of the shooting were contacted by a witness who advised she observed a red SUV driving erratically on Independence Avenue and they observed a skinny black male wearing a ski-mask hanging out of the driver's window, brandishing a rifle. The witness took photographs of the vehicle and sent them to one of the officers they contacted. With the photograph, officers were able to obtain an accurate description of the suspect vehicle (**Maroon Nissan Murano**) and located it in the area of Independence Avenue and Cleveland Avenue. The officers attempted to conduct a traffic stop on the vehicle but the vehicle fled. The officers chased the vehicle for several miles with their emergency lights and sirens activated. Speeds during the chase were up to 100 mph on city streets, until the suspect crashed his vehicle at the intersection of Truman Road and Van Brunt Blvd, where the suspect was taken into custody. After the crash scene was secure, officers located **1008, .223, live rounds of ammunition** scattered throughout the roadway that came from inside of the suspect's vehicle. The Nissan Murano was towed to the City Tow Lot in lieu of a search warrant.

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A search warrant was applied for an approved through the 16th Circuit Court of Jackson County for the **Maroon 2012 Nissan Murano (VIN# [REDACTED])**. Detectives executed the search warrant on the vehicle and inside, they located the following:

- Three, .223, spent shell casings (Driver's floorboard)
- Five, .223, spent shell casings (front passenger floorboard)
- FNH .223 Rifle (Serial# [REDACTED]) with empty drum magazine and one spent shell casing in the chamber (front passenger seat)
- Glock carrying case with miscellaneous Glock items (Back seat inside of suitcase)

The victim's 2012 Hyundai Sonata was processed for evidence after the victim gave written consent. Detectives observed the vehicle to have multiple bullet holes in the driver's door, apparent blood in the front compartment, apparent bullet defects to the inside of the front passenger door, and the driver's window was busted out.

Victim #6 stated the following: The victim was traveling in the area of E 9th Street and Woodland Avenue. He was stopped at a red light when the suspect vehicle (Red SUV or Van) approached his vehicle from behind and then pulled up next to him. He observed a black male pointing a black long gun in his direction and fired two to three shots. He was then struck by gunfire, he traveled to [REDACTED] for help. He was unsure where the suspect drove to after the shooting and was unable to identify him in a lineup.

Witness #2 stated the following: She and her husband were traveling through the area when they observed a maroon SUV driving erratically on Independence Avenue at Woodland Avenue. She observed a black male with a ski-mask hanging from the driver's window brandishing a rifle. She took photographs of the vehicle and gave them to an officer that she saw on an unrelated call for service. She did not observe the shooting.

On 03/02/2024, at 1130 hours, officers were contacted by a victim from a separate incident. The victim advised officers that she was traveling in the area of Benton Blvd and St John Avenue, Kansas City, Jackson County, Missouri, when a red SUV occupied by a black male with a ski mask passed her vehicle. The black male smiled at her and pointed what she described as a "machine gun" at her from his driver's window then fled the area.

Detectives responded to a local hospital where the suspect was obtaining treatment for his minor wounds in the crash that he caused. There, detectives read the suspect his Miranda Rights and he declined to speak with detectives regarding the incident. He was later released from the hospital and transported to Metro Patrol Detention.

I request a warrant be issued for the suspect with a bond associated to that warrant. The suspect has shown a history of violent and erratic behavior when he was convicted of the following: Assault 2nd Degree out of Jackson County Circuit Court (Case# [REDACTED]) on 01/11/2023 and is currently on parole for Assault 2nd Degree.

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Printed Name Detective Sanders #5798 Signature /s/ Detective Sanders #5798

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

Judge

Circuit Court of _____ County, State of Missouri.