

State of Minnesota
County of DakotaDistrict Court
1st Judicial DistrictProsecutor File No. CA-2024-01376
Court File No. 19HA-CR-24-1302

State of Minnesota,

Plaintiff,

vs.

MOHAMED A HARED DOB: 01/26/20002275 4th St NW
Faribault, MN 55021

Defendant.

COMPLAINT

Order of Detention

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 in the 2nd Degree (With Intent) (Not Premeditated)**

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

Maximum Sentence: 3-40 Years

Offense Level: Felony

Offense Date (on or about): 06/29/2024

Control #(ICR#): 24002426

Charge Description: On or about June 29, 2024, in the County of Dakota, Minnesota, MOHAMED A HARED, did cause the death of a human being with intent to effect the death of that person or another, but without premeditation and at the time of offense, the Defendant or an accomplice did use or possess a firearm, to wit: handgun.

On June 29, 2024, shortly after 4 AM, Lakeville police responded to multiple 911 calls reporting a shooting at the Amazon Fulfillment Center's parking lot, located at 9800 217th St. W., Lakeville, Dakota County, Minnesota. One of the callers, Mohamed A Hared, DOB 1/23/2000, ("Defendant") reported to dispatch that he accidentally shot his co-worker, Ahmed Ibrahim Cariif, DOB 12/27/2001, ("Victim"). When officers arrived, they saw Victim lying face down on the ground between two parked cars. Defendant stood nearby with a gun in his hand. A third male ("Witness 1"), waited inside the building for police. Lakeville police took Defendant into custody without incident. Although medics rendered aid to the victim, the aid was unsuccessful, and he was pronounced deceased at the scene.

Lakeville detectives brought Defendant to the Lakeville Police Department for a statement. Defendant stated that he, Victim, and Witness 1 carpooled to work. Defendant said he has a permit to carry a firearm but left the firearm in Witness 1's car. On his firearm, he had a flashlight attachment. Around 1 AM, while on a break from work, Defendant went to the car and noticed the handgun was still near the backseat, but the flashlight attachment was missing. Witness 1 and Victim denied knowing about the missing flashlight attachment. Defendant said that Victim was angry at being accused of taking the attachment. Around 4 AM, the three went on another break and returned to the car to look for the attachment. Witness 1's vehicle, a Rav4, was parked next to a Scion, owned by another employee of Amazon. Defendant stated while looking for the missing attachment, he placed the gun in his waistband. He said he politely asked for the attachment back. Victim became upset and made a stance indicating he wanted to fight Defendant. Defendant told Victim that he did not want to fight. Victim advanced towards him and attempted to punch Defendant. Defendant claimed he had no other choice but to defend himself. He tried to run but was chased by Victim. He ran around the car, but the driver's side door was open, and it blocked his ability to run away. Victim continued fight him. Defendant reached for the gun and stated "Stop man, I don't want to have to use this..." This did not deter Victim and Victim continued to advance towards him. Defendant said, "I don't know if he reached for my gun but as soon as he jumped on me, out of nowhere I heard the first shot, I don't know if I hit anything else." After the first shot, Defendant claimed that Victim held onto him and began to strangle Defendant. Victim tried to force the gun out of his hand. Defendant said, "He tried to reach and that is when the other bullet fired." Defendant said he called 911 for help.

Witness 1 spoke to police. Witness 1 said that he provided Defendant a ride to work because Defendant's vehicle "broke down." Around 1 AM, Defendant, Witness 1 and Victim went to his car. At that time Defendant realized the flashlight for his gun was missing. Defendant accused Witness 1 and Victim of taking it. Both denied taking it. All parties agreed that on their next break they would go to the car to look for it again. Around 4 AM they looked in the car and did not find the flashlight attachment. Witness 1 suggested that they contact security and have them look at the cameras to see if they could find anyone who went in or near their car. Defendant replied, "No. You guys took my flashlight. I want my flashlight back. No one's going home today." He said that Victim and Defendant then got into a physical fight. Witness 1 broke up the fight. Victim sat in the passenger side of the vehicle. Defendant continued to accuse both Witness 1 and Victim of stealing his flashlight attachment. Victim stood back up and Defendant and Victim began to fight again. While they were fighting and holding onto one another, Witness 1 saw Defendant pull out the gun. When Defendant pulled it out, Victim tried to grab the gun. Defendant shot towards Victim. The bullet struck the car. Victim then yelled "Don't shoot me." Witness 1 yelled "Don't shoot." Defendant fired a second shot and Victim fell to the ground. Witness 1 believes there was approximately three to five seconds in between the fired shots. Witness 1 ran inside the building out of fear of being shot and to call for help.

After speaking to Defendant and Witness 1, detectives looked at the surveillance video of the altercation. At 4:01 AM Victim and Defendant met Witness 1 by his vehicle. Detectives noticed that Defendant and Victim physically fought twice. The first altercation began at 4:02:10 AM. Defendant and Victim posture to fight and Defendant threw the first punch. They continue to fight until Witness 1 broke up the fight. Witness 1 tried to stay between Defendant and Victim for approximately 45 seconds. Victim walked back to the passenger side of Witness 1's vehicle and sat down in the passenger seat. He stood back up again. Witness 1 can be seen holding Victim back with his arms. Witness 1 walked Victim back to the front passenger seat. Victim then sat down again in the passenger seat. Witness 1 and Defendant moved to the driver's side of Witness 1's vehicle, looking around on the ground. Victim exited the vehicle and Defendant and Victim moved towards each other. They began to fight again between the vehicles at 4:08:55 AM. On multiple occasions, Defendant had the ability to retreat. Instead, he engaged in the fight and at 4:09:16 Victim was shot and fell to the ground in the walkway.

Lakeville crime scene detectives responded to the scene. In collecting evidence, they observed a 9mm casing on the ground by the driver's side door of the Scion and a second casing on the ground near the front driver's door of the Scion. A bullet hole in the exterior driver's door of Witness 1's vehicle was also discovered. Witness 1's vehicle was processed, and detectives found a bullet fragment from under the front driver's seat.

During the autopsy, blunt force trauma to the jaw facial area, abrasions on hands consistent with a fist fight were observed on Victim. Additionally, the gunshot wound was found to strike the heart, lung, and aorta.