

State of Minnesota
County of Hennepin

District Court
4th Judicial District

Prosecutor File No. 21A00597
Court File No. 27-CR-21-1171

State of Minnesota,

Plaintiff,

vs.

IBSSA M YOUSSEF DOB: 09/22/1983

1350 Nicollet Ave S Apt 520
Minneapolis, MN 55403

Defendant.

COMPLAINT

Summons

☒ Amended

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: Aggravated Robbery-1st Degree

Minnesota Statute: 609.245.1, with reference to: 609.245.1, 609.11.4, 609.17.4(2)

Maximum Sentence: 20 YEARS AND/OR \$35,000

Offense Level: Felony

Offense Date (on or about): 01/15/2021

Control #(ICR#): 21010532

Charge Description: That on or about January 15, 2021, Minneapolis, Minnesota, in Hennepin County, Minnesota, IBSSA M. YOUSSEF, in the presence of Victim, knowing that he was not entitled to the property and used and/or threatened the imminent use of force against Victim attempted to overcome her resistance or powers of resistance to or to compel acquiescence in the taking or carrying away of the property, and inflicted bodily harm upon Victim, while using a dangerous weapon.

Minimum Sentence: 1 YEAR AND 1 DAY

COUNT II

Charge: Assault-2nd Degree-Dangerous Weapon-Substantial Bodily Harm

Minnesota Statute: 609.222.2, with reference to: 609.222.2, 609.11.4, 609.101.2

Maximum Sentence: 10 YEARS AND/OR \$6,000-\$20,000

Offense Level: Felony

Offense Date (on or about): 01/15/2021

Control #(ICR#): 21010532

Charge Description: That on or about January 15, 2021, Minneapolis, Minnesota, in Hennepin County, IBSSA M. YOUSSEF, assaulted Victim and inflicted substantial bodily harm, while using a dangerous weapon.



MINNESOTA JUDICIAL BRANCH

STATEMENT OF PROBABLE CAUSE

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

THIS COMPLAINT IS AMENDED TO CHARGE COUNT I- ATTEMPTED AGGRAVATED ROBBERY IN THE 1ST DEGREE.

On January 15, 2021, Minneapolis Police Department officers responded to possible stabbing on East Franklin Avenue, Minneapolis, Minnesota in Hennepin County.

Law enforcement spoke with Victim, who identified the suspect as mixed-race male, small and wore a black jacket and black pants.

Victim said she was leaving the store with grocery bags in her hands, walking to the back-parking lot. At that point, the suspect approached her and asked for money. The suspect took out a silver knife from his pants pocket. Victim said "no," and "stop." The suspect stabbed her in the side of her left thigh. Victim put up her left hand to protect herself; suspect slashed the web of her hand between her thumb and index finger.

The suspect also stabbed Victim in the back by her right shoulder. (The knife was later retrieved by law enforcement.) Victim did not have any weapons and did not defend herself other than putting up her left hand after she was stabbed.

Other officers arrived on scene; they were told Victim was on the Chicago Avenue South side of the building. A man was standing just outside of the door; he did not appear to have any injuries. Officers spoke with the man, later identified as IBSSA MOHAMED YOUSSEF (date of birth, 09/22/1983, Defendant). Officers asked him if he was hurt. Defendant said, "I stabbed her." Defendant also fit the description of the suspect.

Defendant said he had surgery weeks ago and was attacked in the neck. He said they jumped him and stole his phone, so he stabbed her.

As of this writing, Defendant is in custody.

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

David Swierzewski
Police Sergeant
350 S 5th St
Minneapolis, MN 55415-1389
Badge: 7111

Electronically Signed:
02/13/2023 08:01 AM
Hennepin County, Minnesota

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

Prosecuting Attorney

Christopher James Filipski
300 S 6th St
Minneapolis, MN 55487
(612) 348-5550

Electronically Signed:
02/10/2023 01:08 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 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*

☐ 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: February 13, 2023.

Judicial Officer

John Lucas

Electronically Signed: 02/13/2023 09:36 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.

Ibssa M Youssuf

Defendant

LAW ENFORCEMENT OFFICER RETURN OF SERVICE

*I hereby Certify and Return that I have served a copy of this
Summons upon the Defendant herein named.*

Signature of Authorized Service Agent:

DEFENDANT FACT SHEET

Name: Ibssa M Youssuf
DOB: 09/22/1983
Address: 1350 Nicollet Ave S Apt 520
Minneapolis, MN 55403

Alias Names/DOB: Ibssa Mohamed Youssuf DOB: 9/22/1983
SID: MN21CQ8157
Height:
Weight:
Eye Color:
Hair Color:
Gender: MALE
Race: Black
Fingerprints Required per Statute: Yes
Fingerprint match to Criminal History Record: Yes
Driver's License #:
SILS Person ID #: 735024
SILS Tracking No. 3210769
Case Scheduling Information: Defendant is in custody. Please serve complaint in jail.
Alcohol Concentration:

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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	1/15/2021	609.245.1 Aggravated Robbery-1st Degree	Felony	A1333	A	MN0271100	21010532
	Penalty	1/15/2021	609.245.1 Aggravated Robbery-1st Degree	Felony	A1333	A	MN0271100	21010532
	Penalty	1/15/2021	609.11.4 Minimum Sentences of Imprisonment-Use Dangerous Weapon	Felony	A1333	A	MN0271100	21010532
	Penalty	1/15/2021	609.17.4(2) Anticipatory Crimes-Attempts-Penalty-1/2 Of Intended	Felony	A1333	A	MN0271100	21010532
2	Charge	1/15/2021	609.222.2 Assault-2nd Degree-Dangerous Weapon-Substantial Bodily Harm	Felony	A2233		MN0271100	21010532
	Penalty	1/15/2021	609.222.2 Assault-2nd Degree-Dangerous Weapon-Substantial Bodily Harm	Felony	A2233		MN0271100	21010532
	Penalty	1/15/2021	609.11.4 Minimum Sentences of Imprisonment-Use Dangerous Weapon	Felony	A2233		MN0271100	21010532
	Definition	1/15/2021	609.101.2 Minimum Fines – Victim Assistance Programs	No-Level	A2233		MN0271100	21010532

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