

State of Minnesota  
County of Hennepin

District Court  
4th Judicial District

Prosecutor File No. 19A01096  
Court File No. 27-CR-19-27002

**State of Minnesota,**

Plaintiff,

vs.

**ABDIHAKIM AMIN ESSA DOB: 12/15/1996**

1323 22ND ST E  
#304  
Minneapolis, MN 55404

Defendant.

**COMPLAINT**

Warrant

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: Absentee Voting - Intentionally make or sign false certificate**

Minnesota Statute: 203B.03.1(a)(1)  
Maximum Sentence: 5 Years and/or \$10,000  
Offense Level: Felony

Offense Date (on or about): 06/29/2018

Control #(ICR#): 18272583

Charge Description: That on or about 6/29/18, in Minneapolis, Hennepin County, Minnesota, ABDIHAKIM AMIN ESSA intentionally signed a false eligibility certificate required in Minnesota Statute Section 203B.07 governing absentee ballots.

**COUNT II**

**Charge: Absentee Voting - Intentionally make or sign false certificate**

Minnesota Statute: 203B.03.1(a)(1)  
Maximum Sentence: 5 Years and/or \$10,000  
Offense Level: Felony

Offense Date (on or about): 06/29/2018

Control #(ICR#): 18272583

Charge Description: That on or about 6/29/18, in Minneapolis, Hennepin County, Minnesota, ABDIHAKIM AMIN ESSA intentionally signed a false eligibility certificate required in Minnesota Statute Section 203B.07 governing absentee ballots.

**COUNT III**

**Charge: Absentee Voting - Intentionally make or sign false certificate**

Minnesota Statute: 203B.03.1(a)(1)  
Maximum Sentence: 5 Years and/or \$10,000  
Offense Level: Felony

Offense Date (on or about): 07/02/2018

Control #(ICR#): 18272583

Charge Description: That on or about 7/2/18, in Minneapolis, Hennepin County, Minnesota, ABDIHAKIM AMIN ESSA intentionally signed a false eligibility certificate required in Minnesota Statute Section 203B.07 governing absentee ballots.

#### COUNT IV

**Charge: Absentee Voting - Intentionally make or sign false certificate**

Minnesota Statute: 203B.03.1(a)(1)  
Maximum Sentence: 5 Years and/or \$10,000  
Offense Level: Felony

Offense Date (on or about): 07/02/2018

Control #(ICR#): 18272583

Charge Description: That on or about 7/2/18, in Minneapolis, Hennepin County, Minnesota, ABDIHAKIM AMIN ESSA intentionally signed a false eligibility certificate required in Minnesota Statute Section 203B.07 governing absentee ballots.

#### COUNT V

**Charge: Absentee Voting - Intentionally make or sign false certificate**

Minnesota Statute: 203B.03.1(a)(1)  
Maximum Sentence: 5 Years and/or \$10,000  
Offense Level: Felony

Offense Date (on or about): 07/02/2018

Control #(ICR#): 18272583

Charge Description: That on or about 7/2/18, in Minneapolis, Hennepin County, Minnesota, ABDIHAKIM AMIN ESSA intentionally signed a false eligibility certificate required in Minnesota Statute Section 203B.07 governing absentee ballots.

#### COUNT VI

**Charge: Absentee Voting - Intentionally make or sign false certificate**

Minnesota Statute: 203B.03.1(a)(1)  
Maximum Sentence: 5 Years and/or \$10,000  
Offense Level: Felony

Offense Date (on or about): 07/02/2018

Control #(ICR#): 18272583

Charge Description: That on or about 7/2/18, in Minneapolis, Hennepin County, Minnesota, ABDIHAKIM AMIN ESSA intentionally signed a false eligibility certificate required in Minnesota Statute Section 203B.07 governing absentee ballots.

#### COUNT VII

**Charge: Absentee Voting - Intentionally make or sign false certificate**

Minnesota Statute: 203B.03.1(a)(1)

Maximum Sentence: 5 Years and/or \$10,000

Offense Level: Felony

Offense Date (on or about): 07/02/2018

Control #(ICR#): 18272583

Charge Description: That on or about 7/2/18, in Minneapolis, Hennepin County, Minnesota, ABDIHAKIM AMIN ESSA intentionally signed a false eligibility certificate required in Minnesota Statute Section 203B.07 governing absentee ballots.

**COUNT VIII****Charge: Absentee Voting - Intentionally make or sign false certificate**

Minnesota Statute: 203B.03.1(a)(1)

Maximum Sentence: 5 Years and/or \$10,000

Offense Level: Felony

Offense Date (on or about): 07/03/2018

Control #(ICR#): 18272583

Charge Description: That on or about 7/3/18, in Minneapolis, Hennepin County, Minnesota, ABDIHAKIM AMIN ESSA intentionally signed a false eligibility certificate required in Minnesota Statute Section 203B.07 governing absentee ballots.

**COUNT IX****Charge: Absentee Voting - Intentionally make or sign false certificate**

Minnesota Statute: 203B.03.1(a)(1)

Maximum Sentence: 5 Years and/or \$10,000

Offense Level: Felony

Offense Date (on or about): 07/05/2018

Control #(ICR#): 18272583

Charge Description: That on or about 7/5/18, in Minneapolis, Hennepin County, Minnesota, ABDIHAKIM AMIN ESSA intentionally signed a false eligibility certificate required in Minnesota Statute Section 203B.07 governing absentee ballots.

**COUNT X****Charge: Absentee Voting - Intentionally make or sign false certificate**

Minnesota Statute: 203B.03.1(a)(1)

Maximum Sentence: 5 Years and/or \$10,000

Offense Level: Felony

Offense Date (on or about): 07/23/2018

Control #(ICR#): 18272583

Charge Description: That on or about 7/23/18, in Minneapolis, Hennepin County, Minnesota, ABDIHAKIM AMIN ESSA intentionally signed a false eligibility certificate required in Minnesota Statute Section 203B.07 governing absentee ballots.

**COUNT XI**

**Charge: Absentee Voting - Intentionally make or sign false certificate**

Minnesota Statute: 203B.03.1(a)(1)

Maximum Sentence: 5 Years and/or \$10,000

Offense Level: Felony

Offense Date (on or about): 07/23/2018

Control #(ICR#): 18272583

Charge Description: That on or about 7/23/18, in Minneapolis, Hennepin County, Minnesota, ABDIHAKIM AMIN ESSA intentionally signed a false eligibility certificate required in Minnesota Statute Section 203B.07 governing absentee ballots.

**COUNT XII****Charge: Absentee Voting - Intentionally make or sign false certificate**

Minnesota Statute: 203B.03.1(a)(1)

Maximum Sentence: 5 Years and/or \$10,000

Offense Level: Felony

Offense Date (on or about): 07/23/2018

Control #(ICR#): 18272583

Charge Description: That on or about 7/23/18, in Minneapolis, Hennepin County, Minnesota, ABDIHAKIM AMIN ESSA intentionally signed a false eligibility certificate required in Minnesota Statute Section 203B.07 governing absentee ballots.

**COUNT XIII****Charge: Absentee Voting - Intentionally make or sign false certificate**

Minnesota Statute: 203B.03.1(a)(1)

Maximum Sentence: 5 Years and/or \$10,000

Offense Level: Felony

Offense Date (on or about): 07/23/2018

Control #(ICR#): 18272583

Charge Description: That on or about 7/23/18, in Minneapolis, Hennepin County, Minnesota, ABDIHAKIM AMIN ESSA intentionally signed a false eligibility certificate required in Minnesota Statute Section 203B.07 governing absentee ballots.

**STATEMENT OF PROBABLE CAUSE**

Complainant reports that he has investigated this matter by reading and reviewing reports, interviewing witnesses and reviewing documents and video. Based on that investigation, Complainant believes the following establishes probable cause:

Complainant reports that he was assigned to investigate voter fraud involving absentee ballots. Complainant learned that an absentee ballot requires a signature envelope. This envelope has a space for identifying information about the voter and the voter's signature. Additionally, the signature envelope has a space for a witness signature. The witness must certify that the voter properly handled the ballot. Furthermore, the witness must certify that the witness either is or was registered to vote in Minnesota, is a notary or is authorized to give oaths.

On July 30, 2018, I.S., a known adult female, was working for Hennepin County as an election worker. T.W., another known adult female, was working in the same capacity that day and both were at the Hennepin County Government Center located at 300 South 6th Street, Minneapolis, Hennepin County, Minnesota. Their duties were to process voter registration and absentee ballots. At approximately 3:30 PM, ABDIHAKIM AMIN ESSA, Defendant herein, came to the voting area. I.S. and T.W. were both familiar with Defendant because he had come numerous times to the voting area in June and July, 2018. He had been a "helper" to several voter registrants and absentee voters. On this date, T.W. saw Defendant bring a woman in for registration. The prospective voter did not have proper identification to register and was told to come back with such identification. A short time later, the prospective voter came back with a different "helper" and a new registration form that had a different address from the first application. T.W. and I.S. then decided to find Defendant to ask about this matter.

The women found Defendant on the ground level of the Hennepin County Government Center. Defendant told I.S. that he had been witnessing absentee ballots by signing his father's name because Defendant was not a United States citizen. I.S. had Defendant write down his name and his father's name which was "Aar". He further admitted that he worked for a campaign. I.S. later confirmed that Defendant's father was a registered voter and that his full name is Amin Aar.

Based on this encounter, election officials inspected approximately 9,000 absentee ballots to determine if Defendant had signed his or his father's name as witness to the absentee ballot. Officials were able to identify thirteen (13) absentee ballots that Defendant either signed as witness with his own name or that of his father. The voters of the thirteen identified absentee ballots were sent letters informing them that their ballots had been rejected and that they would need to vote again. None of those thirteen voters voted after the letters were sent.

The thirteen rejected absentee ballots that had been witnessed by Defendant were as follows:

1. Voter H.A.M.'s absentee ballot was issued on June 29, 2018, and was purportedly witnessed by Amin Aar, the name Defendant admitted using to witness such ballots.
2. Voter H.R.M.'s absentee ballot was issued on June 29, 2018, and was purportedly witnessed by Amin Aar, the name Defendant admitted using to witness such ballots.
3. Voter A.A.G.'s absentee ballot was issued on July 2, 2018, and the name signed in the witness block was that of Defendant.
4. Voter M.A.H.'s absentee ballot was issued on July 2, 2018, and the name signed in the witness block

was that of Defendant.

5. Voter M.A.M.'s absentee ballot was issued on July 2, 2018, and the name signed in the witness block was that of Defendant.

6. Voter S.H.A.'s absentee ballot was issued on July 2, 2018, and the name signed in the witness block was that of Defendant.

7. Voter M.A.S.'s absentee ballot was issued on July 2, 2018, and the name signed in the witness block was that of Defendant.

8. Voter S.M.H.'s absentee ballot was issued on July 3, 2018, and was purportedly witnessed by Amin Aar, the name Defendant admitted using to witness such ballots.

9. Voter K.F.G.'s absentee ballot was issued on July 5, 2018, and was purportedly witnessed by Amin Aar, the name Defendant admitted using to witness such ballots.

10. Voter S.A.A.'s absentee ballot was issued on July 23, 2018, and was purportedly witnessed by Amin Aar, the name Defendant admitted using to witness such ballots.

11. Voter A.A.E.'s absentee ballot was issued on July 23, 2018, and was purportedly witnessed by Amin Aar, the name Defendant admitted using to witness such ballots.

12. Voter R.A.J.'s absentee ballot was issued on July 23, 2018, and was purportedly witnessed by Amin Aar, the name Defendant admitted using to witness such ballots.

13. Voter F.M.B.'s absentee ballot was issued on July 23, 2018, and was purportedly witnessed by Amin Aar, the name Defendant admitted using to witness such ballots.

Complainant reports that he reviewed video from July 23, 2018, of the Hennepin County Government Center designated voting area. The video started at approximately 3:30 PM. Complainant saw Defendant on the video with three different people between 3:45 PM and 4:26 PM.

Complainant reports that he contacted United States Immigration and Customs Enforcement. An agent confirmed that Defendant is not a U. S. citizen but rather, is a legal permanent resident. As a non-citizen, Defendant is not eligible to register to vote in Minnesota. Complainant also confirmed that Defendant was not a registered voter and had never been registered to vote. Complainant has further determined that Defendant is not a notary public and that Defendant is not authorized to give oaths.

Complainant further reports that on July 31, 2018, Defendant again came to the Hennepin County voting area. He appeared with a "helper". He attempted to vote using a name other than his own but not that of his father. When asked if he had spoken to another employee a day earlier, Defendant got nervous and acted as if he did not understand English. He stated he had left his identification in his car. He then left and took his application with him.

Complainant reports that he interviewed Defendant's father. Amin Aar stated that he had driven people to the Hennepin County Government Center to vote but that he had not signed any voting documents.

Defendant is currently not in custody. Complainant has attempted to find Defendant on two different dates and has been unsuccessful. Complainant therefore requests a warrant.



**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 Stichter  
Police Sergeant  
350 S 5th St  
Minneapolis, MN 55415-1389  
Badge: 6837

Electronically Signed:  
10/31/2019 01:04 PM  
Hennepin County, Minnesota

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

**Prosecuting Attorney**

Diane Krenz  
300 S 6th St  
Minneapolis, MN 55487  
(612) 348-5550

Electronically Signed:  
10/30/2019 03:54 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 on \_\_\_\_\_, \_\_\_\_\_ at \_\_\_\_\_ AM/PM before the above-named court at the address listed on the attached court summons 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: \$10,000.00

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: October 31, 2019.

**Judicial Officer**

Ivy S. Bernhardson  
District Court Judge

Electronically Signed: 10/31/2019 01:13 PM

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

**COUNTY OF HENNEPIN  
STATE OF MINNESOTA**

**State of Minnesota**

Plaintiff

vs.

**ABDIHAKIM AMIN ESSA**

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:** ABDIHAKIM AMIN ESSA  
**DOB:** 12/15/1996  
**Address:** 1323 22ND ST E  
 #304  
 Minneapolis, MN 55404

**Alias Names/DOB:**

**SID:**

**Height:**

**Weight:**

**Eye Color:**

**Hair Color:**

**Gender:**

**Race:**

**Fingerprints Required per Statute:**

**Fingerprint match to Criminal History Record:** No

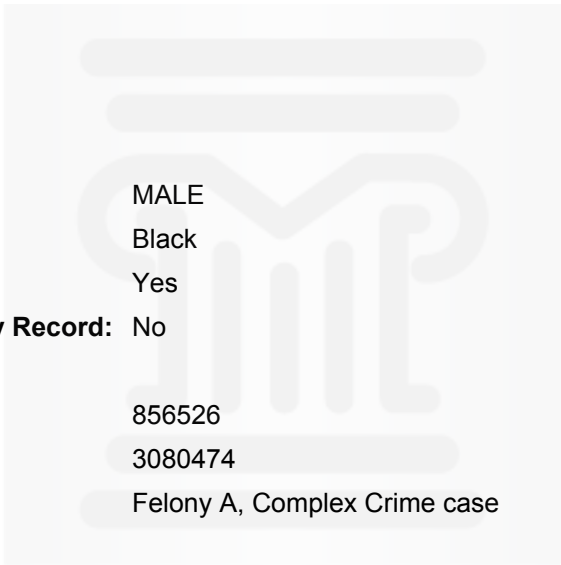
**Driver's License #:**

**SILS Person ID #:** 856526

**SILS Tracking No.** 3080474

**Case Scheduling Information:**

**Alcohol Concentration:**



MINNESOTA  
 JUDICIAL  
 BRANCH

## 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	6/29/2018	203B.03.1(a)(1) Absentee Voting - Intentionally make or sign false certificate	Felony	Y1190		MN0271100	18272583
2	Charge	6/29/2018	203B.03.1(a)(1) Absentee Voting - Intentionally make or sign false certificate	Felony	Y1190		MN0271100	18272583
3	Charge	7/2/2018	203B.03.1(a)(1) Absentee Voting - Intentionally make or sign false certificate	Felony	Y1190		MN0271100	18272583
4	Charge	7/2/2018	203B.03.1(a)(1) Absentee Voting - Intentionally make or sign false certificate	Felony	Y1190		MN0271100	18272583
5	Charge	7/2/2018	203B.03.1(a)(1) Absentee Voting - Intentionally make or sign false certificate	Felony	Y1190		MN0271100	18272583
6	Charge	7/2/2018	203B.03.1(a)(1) Absentee Voting - Intentionally make or sign false certificate	Felony	Y1190		MN0271100	18272583
7	Charge	7/2/2018	203B.03.1(a)(1) Absentee Voting - Intentionally make or sign false certificate	Felony	Y1190		MN0271100	18272583
8	Charge	7/3/2018	203B.03.1(a)(1) Absentee Voting - Intentionally make or sign false certificate	Felony	Y1190		MN0271100	18272583
9	Charge	7/5/2018	203B.03.1(a)(1) Absentee Voting - Intentionally make or sign false certificate	Felony	Y1190		MN0271100	18272583
10	Charge	7/23/2018	203B.03.1(a)(1) Absentee Voting - Intentionally make or sign false certificate	Felony	Y1190		MN0271100	18272583
11	Charge	7/23/2018	203B.03.1(a)(1) Absentee Voting - Intentionally make or sign false certificate	Felony	Y1190		MN0271100	18272583
12	Charge	7/23/2018	203B.03.1(a)(1) Absentee Voting - Intentionally make or sign false certificate	Felony	Y1190		MN0271100	18272583
13	Charge	7/23/2018	203B.03.1(a)(1) Absentee Voting - Intentionally make or sign false certificate	Felony	Y1190		MN0271100	18272583