



the bullet from Tunis' head. Dr. Snell stated that the bullet was either a .40 or .45 caliber due to the size.

4. On September 9<sup>th</sup> 2022 Sioux Falls Police Department Officers responded to [REDACTED] E 10TH STREET, Sioux Falls, Minnehaha County, South Dakota for the report of a shooting. A report was completed under PD22-019909. A group of males were in the area were doing vehicle burglaries. One of the suspects shot a gun at one of the vehicle owners. The owner took a photograph of the suspect vehicle. The suspect vehicle was registered to [REDACTED] ([REDACTED]).

5. On September 10<sup>th</sup>, 2022 Officer Buhr located the vehicle which was being driving by [REDACTED]. A search of the vehicle yielded a Glock 23 .40 caliber handgun (S/N: BAEC011). Detective Beltman interviewed [REDACTED] at the Law Enforcement Center on September 10th, 2022.

6. During the interview, [REDACTED] stated that he was with Mohamed Hassan ([REDACTED]) and the defendant before and after the shooting on September 9th, 2022

7. Detective Beltman was aware that Hassan and the defendant were mentioned as suspects in the homicide of Tunis Lomax. Detective Beltman contacted Your Affiant. Your Affiant arrived and interviewed [REDACTED] as well.

8. [REDACTED] told Your Affiant that he bought the firearm from Hassan about two weeks after the murder of Tunis Lomax. A few days after [REDACTED] bought the firearm, the defendant told [REDACTED] that he had used the firearm to shoot a man about three weeks ago during a vehicle burglary. Your Affiant applied for a search warrant and was able to obtain Snapchat and Instagram records that discuss the sale of the gun between [REDACTED], Hassan and the defendant.

9. A photograph was recovered from [REDACTED] Snapchat account that shows the stolen Glock 23 on August 26<sup>th</sup>, 2022. During this time messages are sent between [REDACTED] and the defendant that appear that the two are meeting at the time the photograph was taken. In the photograph of the Glock 23 the serial number can be seen, BAEC011.

10. The firearm was reported stolen on September 5th, 2022. The firearm owner believes that the firearm was stolen out of his vehicle between 08/18/2022-08/21/2022 while he was in Sioux Falls visiting family, case number PD22-019788.

11. The South Dakota Forensic Lab tested the Glock 23 .40 caliber handgun (S/N: BAEC011) and confirmed it as the same firearm that produced the .40 caliber shell casing that was near Tunis' body.

12. Additional data obtained from the defendant's Snapchat show the defendant with a Glock 23 firearm on September 2<sup>nd</sup> 2022, the same time frame that the stolen Glock 23 was sold to [REDACTED]. On August 19<sup>th</sup> 2022 the defendant also sent several messages to [REDACTED] telling him that he needed to go pick up the "stoley" which is slang for a stolen vehicle.

13. During the investigation of the homicide of Tunis Lomax two stolen vehicles were seen in the area at the time of the homicide. The two vehicles were a 2016 white Ford Focus (Wisconsin Plate: [REDACTED]) and 2021 Grey Chrysler Pacifica (South Dakota Plate: [REDACTED]). Both vehicles are on video around S Stephan Ave at the time of the homicide.

14. These vehicles were also seen on security camera at the Kum N Go Gas Station ([REDACTED] N Sycamore Ave) on August 19<sup>th</sup> 2022 at 0400hrs. There were two males who exited the vehicles and entered the store. The video was reviewed, and the Sioux Falls Street Crimes Unit advised that the two males were Hassan and the defendant.

15. The 2016 white Ford Focus (Wisconsin Plate: [REDACTED]) was processed by the Sioux Falls Crime Lab. Several fingerprints were collected. One of the prints was confirmed to belong to Hassan. Your Affiant interviewed Hassan about this matter. During the interview Hassan stated that he only spends time with [REDACTED] ([REDACTED]) and his cousin, the defendant.

16. [REDACTED] also resides at [REDACTED] S BLAINE AVE. The 2016 white Ford Focus can be seen on video being abandoned in the [REDACTED] block of S Blaine Ave on 08/20/2022 at 0217hrs; 14 minutes after 911 is called for the homicide of Tunis Lomax. Two individuals can be seen on video exiting this vehicle and walking south on S Blaine Ave. This vehicle was stolen during the early morning hours of August 19<sup>th</sup>, 2022, and left

abandoned on August 20<sup>th</sup>, 2022. The suspects had this vehicle for 24 hours before the vehicle was left, this is abnormal for stolen vehicles unless they were use in another crime.

17. On November 8<sup>th</sup>, 2022, the defendant was interviewed by Detective Meier at the Sioux Falls Police Department. The defendant denied any knowledge of the homicide and stated that he was not in Sioux Falls at the time of the incident. The defendant stated that he flew to Denver, CO on August 18<sup>th</sup>, 2022, via Spirit Airlines with his girlfriend, [REDACTED] ([REDACTED])

18. Your Affiant was able to determine there were several inconsistencies in the defendant's statement. Spirit Airlines does not fly out of the Sioux Falls Airport. Location data from the defendant's cell phone provider and social media account placed him in Sioux Falls on August 19<sup>th</sup>, 2022, and August 20<sup>th</sup>, 2022. Your Affiant also obtained several subpoenas from the airlines that do provide services out of the Sioux Falls Airport. None of these airlines had records of a passenger with the defendant's name for all of August 2022.

19. Your Affiant also interviewed the defendant's girlfriend, [REDACTED]. she denied going to Denver with the defendant and believed he was in Sioux Falls.

20. The firearm, the Glock 23 .40 caliber handgun (S/N: BAEC011) was examined at the Sioux Falls Police Department and was photographed. Several unique identifying marks were located on this firearm. These same markings can be seen on a video that was recorded by the defendant on September 2<sup>nd</sup>, 2022, on his Snapchat account. These marks are not from the manufacturer and are unique to this individual firearm. This same firearm was identified by the South Dakota Forensic Laboratory to be the firearm used in the homicide of Tunis Lomax.

21. All these events took place in Sioux Falls, Minnehaha County, South Dakota.

*M. Black #1035*

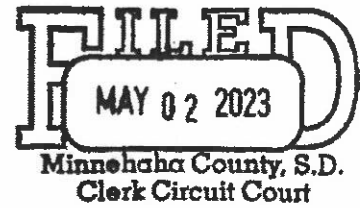
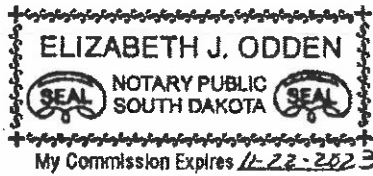
M.Black #1035

Subscribed and sworn before me

this 1st day of May, 2023.

*Elizabeth J. Odden*

Notary Public



STATE OF SOUTH DAKOTA )  
 )  
COUNTY OF MINNEHAHA )

IN CIRCUIT COURT  
SECOND JUDICIAL CIRCUIT  
MAGISTRATE DIVISION

STATE OF SOUTH DAKOTA,  
Plaintiff,

PD22-018197

vs.

COMPLAINT

SALIM KHALID MOHAMMED  
MOHAMED HASSAN,  
MUSTEFA SAHLE,  
HAMZA ABOULKADER HASSAN,  
Defendant.

CRI 23-2687

- 1 Murder, First Degree (F-A) as to SKM
- 2 Murder, Second Degree (F-B) as to SKM
- 3 Manslaughter, First Degree (F-C) as to SKM, MH, MS, HAH
- 4 Receiving or Possession of Stolen Motor Vehicles (F-5) as to  
SKM, MH, MS, HAH
- 5 Grand Theft (F-6) as to SKM, MH

The undersigned being first duly sworn on oath complains and charges:

Count 1

That the Defendant, Salim Khalid Mohammed, in Minnehaha County, State of South Dakota, on or about August 20, 2022, in that he did commit an act of homicide while being the person who perpetrated, or attempted to perpetrate, any arson, rape, robbery, burglary, kidnapping, or unlawful throwing, placing, or discharging of a destructive device or explosive, and who subsequently effected the death of any victim of such crime to prevent detection or prosecution of the crime, to-wit: Salim Khalid Mohammed did commit an act of homicide while being the person who perpetrated, or attempted to perpetrate, any arson, rape, robbery, burglary, kidnapping, or unlawful throwing, placing, or discharging of a destructive device or explosive, and who subsequently effected the death of Tunis Sando Lomax, the victim of such crime, to prevent detection or prosecution of the crime, in violation of SDCL 22-16-1(1), 22-16-4, 22-16-12, (Cl. A felony); contrary to the form of the statute in such case made and provided and against the peace and dignity of the State of South Dakota.

Count 2

That the Defendant, Salim Khalid Mohammed, in Minnehaha County, State of South Dakota, on or about August 20, 2022, in that he did commit an act of murder while engaged in the perpetration by any act imminently dangerous to others and evincing a depraved mind, without regard to human life, although without any premeditated design to effect the death of any particular person, to wit: Salim Khalid Mohammed did commit an act of murder while engaged in the perpetration by any act imminently dangerous to Tunis Sando Lomax and evincing a depraved mind, without regard to human life, although without any premeditated design to effect the death of Tunis Sando Lomax, in violation of SDCL 22-16-1(1), 22-16-7, 22-16-12, (Cl. B felony); contrary to the form of the statute in such case made and provided and against the peace and dignity of the State of South Dakota.

Count 3


That the Defendants, Salim Khalid Mohammed, Mustefa Sahle, Hamza Aboulkader Hassan and Mohamed Hassan, in Minnehaha County, State of South Dakota, on or about August 20, 2022, in that the defendants did without any design to effect the death of another, while engaged in the commission of any felony other than as provided in § 22-16-4(2), to-wit: Salim Khalid Mohammed, Mustefa Sahle, Hamza Aboulkader Hassan, and Mohamed Hassan did without any design to effect the death of Tunis Sando Lomax, while engaged in the commission of a felony, cause the death of Tunis Sando Lomax, in violation of SDCL 22-16-1(2); contrary to the form of the statute in such case made and provided and against the peace and dignity of the State of South Dakota. 22-16-15(1); (Cl. C felony).

Count 4

That the Defendants, Salim Khalid Mohammed, Mustefa Sahle, Hamza Aboulkader Hassan, and Mohammed Hassan in Minnehaha County, State of South Dakota, on or about August 20, 2022, in that the defendant did have in their possession a motor vehicle, knowing or having reason to believe the motor vehicle had been stolen, to wit: Salim Khalid Mohammed, Mustefa Sahle, Hamza Aboulkader Hassan, and Mohammed Hassan did have in their possession a motor vehicle, a 2016 Ford Focus belonging to AgSource, knowing or having reason to believe the motor vehicle had been stolen, in violation of SDCL 32-4-5, (Cl. 5 felony); contrary to the form of the statute in such case made and provided and against the peace and dignity of the State of South Dakota.

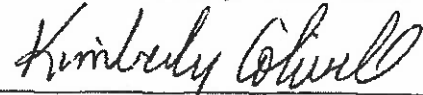
Count 5

That the Defendants, Salim Khalid Mohammed, and Mohammed Hassan, in Minnehaha County, State of South Dakota, on or about August 20, 2022, in that the defendants did take or exercise unauthorized control over property of another with intent to deprive that person of the property, to-wit: Salim Khalid Mohammed, and Mohammed Hassan did take or exercise unauthorized control over property of Tyler Morog, with the intent to deprive Tyler Morog of it, such property being a firearm with a value of less than or equal to \$2,500.00, in violation of SDCL 22-30A-1, SDCL 22-30A-17(2), (Cl. 6 felony); contrary to the form of the statute in such case made and provided and against the peace and dignity of the State of South Dakota.

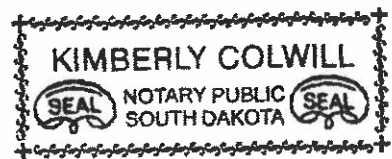


Deputy State's Attorney  
Minnehaha County, South Dakota


Subscribed and sworn to before me this May 2, 2023.



My commission expires:  
07/01/2025



REQUEST FOR ARREST WARRANT  
THE UNDERSIGNED ATTORNEY  
HEREBY REQUEST AN ARREST  
WARRANT BE ISSUED BASED ON  
THE ABOVE COMPLANT



Deputy State's Attorney  
Minnehaha County, South Dakota

SKM DOB: [REDACTED] S OLD BROOK PL, SF, SD 57106  
MH DOB: [REDACTED] S. HAWTHORNE AVE [REDACTED] SF, SD 57105  
MS DOB: [REDACTED] E. RONNING DR [REDACTED] SF, SD 57103  
HAS DOB: [REDACTED] N. 4<sup>TH</sup> AVE [REDACTED], SF, SD 57104

Arresting Officer: Detective Morgan L. Black

