

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27

IN THE DISTRICT COURT FOR THE STATE OF ALASKA
THIRD JUDICIAL DISTRICT AT ANCHORAGE

STATE OF ALASKA,

Plaintiff,

vs.

MAHMOOD AHMAD

DOB: 07/12/1964

APSIN ID: 8572797

DMV NO.: 7586240

ATN: 115745922

Defendant.

Case No. 3AN-21-03327CR
3AN-16-1215/1503/1504/1619/1620/1701/1702SW

INFORMATION

I certify this document and its attachments do not contain the (1) name of a victim of a sexual offense listed in AS 12.61.140 or (2) residence or business address or telephone number of a victim of or witness to any offense unless it is an address identifying the place of a crime or an address or telephone number in a transcript of a court proceeding and disclosure of the information was ordered by the court. The following counts charge a crime involving DOMESTIC VIOLENCE as defined in AS 18.66.990: NONE

Count I - AS 11.71.020(a)(1)
Second Degree Misconduct Involving A Controlled Substance
Mahmood Ahmad - 001

Count II - AS 11.71.020(a)(1)
Second Degree Misconduct Involving A Controlled Substance
Mahmood Ahmad - 002

Count III - AS 11.71.020(a)(1)
Second Degree Misconduct Involving A Controlled Substance
Mahmood Ahmad - 003

Count IV - AS 11.71.020(a)(1)
Second Degree Misconduct Involving A Controlled Substance
Mahmood Ahmad - 004

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27

Count V - AS 11.71.020(a)(1)
Second Degree Misconduct Involving A Controlled Substance
Mahmood Ahmad - 005

Count VI - AS 11.71.020(a)(1)
Second Degree Misconduct Involving A Controlled Substance
Mahmood Ahmad - 006

Count VII - AS 11.71.020(a)(1)
Second Degree Misconduct Involving A Controlled Substance
Mahmood Ahmad - 007

Count VIII - AS 11.71.020(a)(1)
Second Degree Misconduct Involving A Controlled Substance
Mahmood Ahmad - 008

Count IX - AS 11.71.020(a)(1)
Second Degree Misconduct Involving A Controlled Substance
Mahmood Ahmad - 009

Count X - AS 11.71.020(a)(1)
Second Degree Misconduct Involving A Controlled Substance
Mahmood Ahmad - 010

Count XI - AS 11.71.020(a)(1)
Second Degree Misconduct Involving A Controlled Substance
Mahmood Ahmad - 011

Count XII - AS 11.71.020(a)(1)
Second Degree Misconduct Involving A Controlled Substance
Mahmood Ahmad - 012

Count XIII - AS 11.71.020(a)(1)
Second Degree Misconduct Involving A Controlled Substance
Mahmood Ahmad - 013

Count XIV - AS 11.71.020(a)(1)
Second Degree Misconduct Involving A Controlled Substance
Mahmood Ahmad - 014

Count XV - AS 11.71.020(a)(1)
Second Degree Misconduct Involving A Controlled Substance

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27

Mahmood Ahmad - 015

Count XVI - AS 11.71.020(a)(1)
Second Degree Misconduct Involving A Controlled Substance
Mahmood Ahmad - 016

Count XVII - AS 11.71.020(a)(1)
Second Degree Misconduct Involving A Controlled Substance
Mahmood Ahmad - 017

Count XVIII - AS 11.71.020(a)(1)
Second Degree Misconduct Involving A Controlled Substance
Mahmood Ahmad - 018

Count XIX - AS 11.71.040(a)(1)
Fourth Degree Misconduct Involving A Controlled Substance
Mahmood Ahmad - 019

Count XX - AS 11.41.250
Reckless Endangerment
Mahmood Ahmad - 020

THE DISTRICT ATTORNEY CHARGES:

COUNT I

That on or about May 9, 2016, at or near Anchorage, in the Third Judicial District, State of Alaska, MAHMOOD AHMAD knowingly manufactured or delivered any amount of a schedule IA controlled substance: oxycodone and methadone. All of which is a class A felony offense being contrary to and in violation of AS 11.71.020(a)(1) and AS 17.30.080 and against the peace and dignity of the State of Alaska.

COUNT II

That on or about May 9, 2016, at or near Anchorage, in the Third Judicial District, State of Alaska, MAHMOOD AHMAD knowingly manufactured or delivered any amount of a schedule IA controlled substance: oxycodone and methadone. All of

1 which is a class A felony offense being contrary to and in violation of AS 11.71.020(a)(1)
2 and AS 17.30.080 and against the peace and dignity of the State of Alaska.

3
4 **COUNT III**

5 That on or about May 9, 2016, at or near Anchorage, in the Third Judicial
6 District, State of Alaska, MAHMOOD AHMAD knowingly manufactured or delivered
7 any amount of a schedule IA controlled substance: oxycodone and methadone. All of
8 which is a class A felony offense being contrary to and in violation of AS 11.71.020(a)(1)
9 and AS 17.30.080 and against the peace and dignity of the State of Alaska.

10 **COUNT IV**

11 That on or about May 9, 2016, at or near Anchorage, in the Third Judicial
12 District, State of Alaska, MAHMOOD AHMAD knowingly manufactured or delivered
13 any amount of a schedule IA controlled substance: oxycodone and methadone. All of
14 which is a class A felony offense being contrary to and in violation of AS 11.71.020(a)(1)
15 and AS 17.30.080 and against the peace and dignity of the State of Alaska.

16 **COUNT V**

17 That on or about May 9, 2016, at or near Anchorage, in the Third Judicial
18 District, State of Alaska, MAHMOOD AHMAD knowingly manufactured or delivered
19 any amount of a schedule IA controlled substance: oxycodone and methadone. All of
20 which is a class A felony offense being contrary to and in violation of AS 11.71.020(a)(1)
21 and AS 17.30.080 and against the peace and dignity of the State of Alaska.

22
23
24 **COUNT VI**

25 That on or about May 9, 2016, at or near Anchorage, in the Third Judicial
26 District, State of Alaska, MAHMOOD AHMAD knowingly manufactured or delivered
27

1 any amount of a schedule IA controlled substance: oxycodone and methadone. All of
2 which is a class A felony offense being contrary to and in violation of AS 11.71.020(a)(1)
3 and AS 17.30.080 and against the peace and dignity of the State of Alaska.

4
5 **COUNT VII**

6 That on or about May 9, 2016, at or near Anchorage, in the Third Judicial
7 District, State of Alaska, MAHMOOD AHMAD knowingly manufactured or delivered
8 any amount of a schedule IA controlled substance: oxycodone and methadone. All of
9 which is a class A felony offense being contrary to and in violation of AS 11.71.020(a)(1)
10 and AS 17.30.080 and against the peace and dignity of the State of Alaska.

11 **COUNT VIII**

12 That on or about May 9, 2016, at or near Anchorage, in the Third Judicial
13 District, State of Alaska, MAHMOOD AHMAD knowingly manufactured or delivered
14 any amount of a schedule IA controlled substance: oxycodone and methadone. All of
15 which is a class A felony offense being contrary to and in violation of AS 11.71.020(a)(1)
16 and AS 17.30.080 and against the peace and dignity of the State of Alaska.

17 **COUNT IX**

18 That on or about May 9, 2016, at or near Anchorage, in the Third Judicial
19 District, State of Alaska, MAHMOOD AHMAD knowingly manufactured or delivered
20 any amount of a schedule IA controlled substance: oxycodone and methadone. All of
21 which is a class A felony offense being contrary to and in violation of AS 11.71.020(a)(1)
22 and AS 17.30.080 and against the peace and dignity of the State of Alaska.

23
24 **COUNT X**

25 That on or about May 9, 2016, at or near Anchorage, in the Third Judicial
26 District, State of Alaska, MAHMOOD AHMAD knowingly manufactured or delivered
27

1 any amount of a schedule IA controlled substance: oxycodone and methadone. All of
2 which is a class A felony offense being contrary to and in violation of AS 11.71.020(a)(1)
3 and AS 17.30.080 and against the peace and dignity of the State of Alaska.

4
5 **COUNT XI**

6 That on or about May 9, 2016, at or near Anchorage, in the Third Judicial
7 District, State of Alaska, MAHMOOD AHMAD knowingly manufactured or delivered
8 any amount of a schedule IA controlled substance: oxycodone and methadone. All of
9 which is a class A felony offense being contrary to and in violation of AS 11.71.020(a)(1)
10 and AS 17.30.080 and against the peace and dignity of the State of Alaska.

11 **COUNT XII**

12 That on or about May 9, 2016, at or near Anchorage, in the Third Judicial
13 District, State of Alaska, MAHMOOD AHMAD knowingly manufactured or delivered
14 any amount of a schedule IA controlled substance: oxycodone and methadone. All of
15 which is a class A felony offense being contrary to and in violation of AS 11.71.020(a)(1)
16 and AS 17.30.080 and against the peace and dignity of the State of Alaska.

17 **COUNT XIII**

18 That on or about May 9, 2016, at or near Anchorage, in the Third Judicial
19 District, State of Alaska, MAHMOOD AHMAD knowingly manufactured or delivered
20 any amount of a schedule IA controlled substance: oxycodone and methadone. All of
21 which is a class A felony offense being contrary to and in violation of AS 11.71.020(a)(1)
22 and AS 17.30.080 and against the peace and dignity of the State of Alaska.

23
24 **COUNT XIV**

25 That on or about May 9, 2016, at or near Anchorage, in the Third Judicial
26 District, State of Alaska, MAHMOOD AHMAD knowingly manufactured or delivered
27

1 any amount of a schedule IA controlled substance: oxycodone and methadone. All of
2 which is a class A felony offense being contrary to and in violation of AS 11.71.020(a)(1)
3 and AS 17.30.080 and against the peace and dignity of the State of Alaska.

4
5 **COUNT XV**

6 That on or about May 10, 2016, at or near Anchorage, in the Third Judicial
7 District, State of Alaska, MAHMOOD AHMAD knowingly manufactured or delivered
8 any amount of a schedule IA controlled substance: oxycodone and methadone. All of
9 which is a class A felony offense being contrary to and in violation of AS 11.71.020(a)(1)
10 and AS 17.30.080 and against the peace and dignity of the State of Alaska.

11
12 **COUNT XVI**

13 That on or about May 10, 2016, at or near Anchorage, in the Third Judicial
14 District, State of Alaska, MAHMOOD AHMAD knowingly manufactured or delivered
15 any amount of a schedule IA controlled substance: oxycodone and methadone. All of
16 which is a class A felony offense being contrary to and in violation of AS 11.71.020(a)(1)
17 and AS 17.30.080 and against the peace and dignity of the State of Alaska.

18
19 **COUNT XVII**

20 That on or about May 10, 2016, at or near Anchorage, in the Third Judicial
21 District, State of Alaska MAHMOOD AHMAD knowingly manufactured or delivered
22 any amount of a schedule IA controlled substance: oxycodone and methadone. All of
23 which is a class A felony offense being contrary to and in violation of AS 11.71.020(a)(1)
24 and AS 17.30.080 and against the peace and dignity of the State of Alaska.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27

COUNT XVIII

That on or about May 10, 2016, at or near Anchorage, in the Third Judicial District, State of Alaska, MAHMOOD AHMAD knowingly manufactured or delivered any amount of a schedule IA controlled substance: oxycodone and methadone. All of which is a class A felony offense being contrary to and in violation of AS 11.71.020(a)(1) and AS 17.30.080 and against the peace and dignity of the State of Alaska.

COUNT XIX

That on or about May 9, 2016, in the Third Judicial District, State of Alaska, at or near Anchorage, MAHMOOD AHMAD knowingly delivered any amount of a schedule IVA or VA controlled substance, alprazolam (known commercially as Xanax). All of which is a class C felony offense being contrary to and in violation of AS11.71.040(a)(1) and AS 17.30.080 and against the peace and dignity of the State of Alaska.

COUNT XX

That during the month of May 2016, at or near Anchorage, in the Third Judicial District, State of Alaska, MAHMOOD AHMAD recklessly engaged in conduct which created a substantial risk of serious physical injury to another person. All of which is a class A misdemeanor offense being contrary to and in violation of AS11.41.250 and against the peace and dignity of the State of Alaska.

The undersigned swears under oath this Information is based upon a review of MFCU report 0642139 and the associated investigation submitted to date, as well as my face to face discussions with MFCU Chief Investigator Quentin Warren.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27

The attached affidavit of Chief Investigator Quinten Warren establishes probable cause and provides the court with the factual bases supporting the charges and the State’s specific warrant request.

Dated at Anchorage, Alaska, this ____ day of May, 2021.

TREG R. TAYLOR
ATTORNEY GENERAL

By: _____
James J. Fayette
Assistant Attorney General
Alaska Bar No. 9106035