

IN THE SUPERIOR COURT OF THE  
STATE OF WASHINGTON  
IN AND FOR THE COUNTY OF CLALLAM

STATE OF WASHINGTON,

Plaintiff,

vs.

ABDINJIB IBRAHAM

Defendant(s).

NO.

**CRIMINAL INFORMATION**

FOR: Count I: Attempted Murder in the Second Degree (RCW 9A.28.020; RCW 9A.32.050(1)(a))

I, ROBERT W. FERGUSON, Attorney General of Washington, in the venue of Clallam County, in the name of and by the authority of the State of Washington pursuant to RCW 43.10.232(1)(a) and the written request of the Clallam County Prosecuting Attorney, do accuse ABDINJIB IBRAHAM of the following crime, committed as follows:

**COUNT I: ATTEMPTED MURDER IN THE SECOND DEGREE,**

On or about the 25th day of January, 2016, in the County of Clallam, State of Washington, defendant ABDINJIB IBRAHAM, with intent to commit the crime of murder in the second degree against Terry Breedlove, did commit an act which was a substantial step toward the commission of murder in the second degree, contrary to RCW 9A.28.020 and RCW 9A.32.050(1)(a), and against the peace and dignity of the State of Washington.

The completed elements of the crime of murder in the second degree are: with intent to cause the death of another person, cause the death of such person, contrary to RCW 9A.32.030(1)(a).

It is further specially alleged that at the time of the commission of the crime, the defendant was armed with a deadly weapon as defined in RCW 9.94A.825, thereby invoking the provisions of RCW 9.94A.533(4) and adding additional time to the presumptive sentence as provided for in RCW 9.94A.533(4).

STATE OF WASHINGTON  
v. ABDINJIB IBRAHAM

Cause No.

Attempted murder in the second degree is a class A felony. RCW 9A.28.020(3)(a). The maximum penalty is life imprisonment and a \$50,000 fine, plus restitution, costs and assessments.

DATED this 1st day of June, 2018.

ABDINJIB IBRAHAM: B/M,  
DOB 01 /01/1988, 6'3", 155 lbs.,  
black hair, brown eyes, DOC#375760,  
WA DOL Unk, SID WA 24844638,  
FBI 456849CD8,  
Address: WA Dept. of Corrections  
(Washington Corrections Center, Shelton)

ROBERT W. FERGUSON  
Attorney General

By:

  
JOHN HILLMAN, WSBA #25071

Assistant Attorney General

cc: Public Defender

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

**IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON  
IN AND FOR THE COUNTY OF CLALLAM**

THE STATE OF WASHINGTON,

Plaintiff,

v.

ABDINJIB IBRAHAM,

Defendant.

NO.

DECLARATION FOR  
DETERMINATION OF  
PROBABLE CAUSE

Ed Anderson declares under penalty of perjury of the laws of the State of Washington:

I am a sergeant for the Clallam County Sheriff's Office (CCSO). I investigated CCSO incident number 2016-2111, which concerned an assault on Department of Corrections (DOC) Officer Terry Breedlove at Clallam Bay Corrections Center (CBCC) on January 25, 2016. I investigated this incident and read CCSO reports and laboratory test results arising from this incident. I also reviewed records provided by DOC pertaining to its documentation of the assault. My investigation and review of CCSO reports, DOC reports, medical reports, lab reports, crime scene photos and other documents provided me with the following information, which I believe establishes probable cause for the crime of attempted murder.

On January 25, 2016, Abdinjib Ibrahim (d.o.b. 1-1-88) was an inmate at the Clallam Bay Corrections Center in Clallam County, WA. Ibrahim was housed in Unit G of the prison. On that same date, Terry Breedlove was working as a corrections officer in Unit G. Officer

1 Breedlove was working alone in Unit G, which houses approximately 90 felony offenders  
2 serving sentences at DOC.

3 During the morning hours of January 25, 2016, Officer Breedlove commenced  
4 "rounds" by doing a walk-through of Unit G. At that time, cell doors were unlocked and  
5 inmates were free to move about Unit G. Ibrahim was housed in cell A19 on the ground floor  
6 of Unit G. Ibrahim did not have a cell mate as his cell mate was released from custody earlier  
7 that morning. Ibrahim had recently returned to Unit G after time in solitary confinement as  
8 discipline for an altercation with another corrections officer.

9 Ibrahim's cell included a metal desk bolted to the wall of the cell. A metal arm  
10 protruded from the desk and a solid metal stool seat was attached to the end of the metal arm.  
11 Unknown to CBCC corrections staff that morning, the metal stool seat had been broken off  
12 the metal arm and removed.

13 At approximately 9:15 a.m. on January 25, 2016, Officer Breedlove walked past  
14 Ibrahim's cell. Ibrahim used the metal stool seat as a weapon and beat Officer Breedlove in  
15 the head with it. The assault occurred in the open dayroom in Unit G in front of many  
16 inmates. Officer Breedlove fell face down on the floor of the prison after being struck in the  
17 head with the piece of metal. Per the accounts of other inmates who witnessed the assault,  
18 Ibrahim used the metal stool seat to beat Officer Breedlove in the head repeatedly and with as  
19 much force as he could muster. Ibrahim also threw the metal stool seat down on Officer  
20 Breedlove's head as Breedlove lay unconscious on the prison floor, striking him several times.  
21 After striking Officer Breedlove repeatedly in the head until he was unconscious, Ibrahim set  
22 the metal stool seat down on a table in the dayroom of Unit G. Ibrahim left Officer Breedlove  
23 lying face down in a pool of blood and walked away.

24 CBCC staff were alerted to the assault and broadcast a request for assistance over the  
25 radio. A DOC sergeant was in a secure office in a hallway outside of Unit G. The sergeant  
26 opened the door to the office to respond to the request for assistance and found Ibrahim

1 standing outside of her door. Ibrahim immediately stated, "I'm the one you want. I did it."  
2 Ibrahim turned his back to the sergeant and extended his arms behind him for handcuffing.

3 While the sergeant was placing handcuffs on Ibrahim, the corrections supervisor for  
4 Unit G entered the hallway. Ibrahim looked the corrections supervisor directly in the eye and  
5 said, "I did it. I killed him. I know I did."

6 CBCC staff responded to Unit G and found Officer Breedlove unconscious and face  
7 down in a pool of blood. Officer Breedlove had numerous wounds to his face and head and he  
8 was bleeding profusely. CBCC staff immediately returned all inmates to their cells and  
9 secured Unit G as a crime scene. DOC summoned police and an ambulance. An ambulance  
10 transported Officer Breedlove to Forks Community Hospital.

11 The Clallam County Sheriff's Office responded to the prison to investigate.  
12 Investigators found a bloody metal stool seat sitting on a table in the dayroom of Unit G.  
13 CCSO secured a search warrant for Ibrahim's cell. Ibrahim's cell was searched and it was  
14 determined that Ibrahim's cell was the only cell in Unit G that was missing a stool seat.

15 CBCC staff moved Ibrahim from Unit G to a cell in the Intensive Management Unit  
16 (IMU) while DOC investigators and police investigated the scene inside Unit G. During  
17 transport from Unit G to the IMU, Ibrahim made numerous outbursts. Ibrahim told staff that  
18 the corrections officer who had caused him to go to solitary confinement was his intended  
19 target, but when he did not see him, Officer Breedlove "had to pay the price." Ibrahim  
20 admitted using a weapon to assault Officer Breedlove. Ibrahim threatened corrections staff  
21 with physical violence and death during the transport to the IMU.

22 Ibrahim made a statement while being processed into the IMU, "Guy I hit wasn't even  
23 the one that had it coming, but you all the same and I couldn't wait." Corrections staff  
24 monitored Ibrahim from outside of his cell in the IMU. While in the cell, Ibrahim made the  
25 statement to observing corrections staff, "That officer is dead. I was going for the kill. I know  
26 what I'm doing." Ibrahim also said, "He is dead. I know what I am doing. I will kill you, one

1 of you mess with me, I will get one of you.” CBCC staff set a video camera in front of  
2 Ibrahim’s cell and set it to record. On the recording, Ibrahim made the unsolicited statement,  
3 “He’s dead, man. I know what the f--- I was doing. He’s dead, don’t cry now.”

4 On February 23, 2016, the DOC inmate phone system recorded Ibrahim admitting to  
5 his father that he hit a corrections office with a piece of metal and the officer might die. In  
6 another recorded phone call that day, Ibrahim admitted to an uncle that he hit a corrections  
7 officer with a piece of metal.

8 On February 25, 2016, Ibrahim told an uncle during a recorded phone call that he hit a  
9 corrections officer in the head with a piece of metal seven times. Ibrahim told the uncle that  
10 he kept hitting the officer until he fell to the ground.

11 CCSO collected the clothing Ibrahim was wearing at the time of the assault. CCSO  
12 submitted Ibrahim’s clothing, the metal stool seat, and a biological sample from Terry  
13 Breedlove to the Washington State Patrol Crime Lab for DNA analysis. Stains on Ibrahim’s  
14 clothing were determined to be blood containing a DNA profile that matched the DNA profile  
15 of Terry Breedlove. DNA extracted from bloodstains on the stool seat also matched the DNA  
16 profile of Terry Breedlove.

17 At Forks Hospital, medical staff cleaned Breedlove’s wounds and both stapled and  
18 sutured them closed. Breedlove suffered numerous lacerations to his head and face. A head  
19 CT scan taken at Forks Hospital was interpreted to be negative for intracranial injury.  
20 However, Breedlove suffered memory loss, headaches, and blurred vision. When contacted at  
21 the hospital, Breedlove could not remember his name, his address, or going to work that day.

22 Breedlove was in terrible pain following his release from Forks Hospital. Breedlove  
23 suffered severe headaches, memory loss, blurred vision, and impairment of balance over the  
24 course of the next month. The pain became so intense that on March 9, 2016, Breedlove’s  
25 parents drove him directly from Forks to Harborview Medical Center in Seattle. A CT scan  
26 taken at Harborview revealed a large subdural hematoma. The CT scan further revealed that

1 Breedlove's brain had shifted 6 mm to one side of his skull due to the pressure created by the  
2 subdural hematoma. Medical intervention was necessary to prevent death or further brain  
3 damage. Doctors drilled holes in Breedlove's skull to drain the blood from his cranium and  
4 relieve the pressure on his brain. Medical doctors at Harborview concluded that the brain  
5 bleed was secondary to the assault at the prison on January 25, 2016. Medical doctors  
6 diagnosed Breedlove with concussive syndrome and a traumatic brain injury. Medical records  
7 indicate that from the brain injury suffered during the assault, Breedlove continues to suffer  
8 permanent memory loss, headaches, blurred vision, and impairment of balance.

9 I declare under penalty of perjury under the laws of the State of Washington that the  
10 foregoing is true and correct to the best of my knowledge.

11 DATED this 31 day of May, 2018 at Port Angeles, Washington.

12   
13 ED ANDERSON C113  
14 Sergeant, Clallam County Sheriff's Office