

State of Minnesota  
County of Hennepin

District Court  
4th Judicial District

Prosecutor File No. 16A06282  
Court File No. 27-CR-16-14748

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**State of Minnesota,**  
Plaintiff,

**COMPLAINT**  
Warrant

vs.

**RYAN PAUL HOWARD DOB: 11/30/1989**

1900 Chicago Ave  
Minneapolis, MN 55406

Defendant.

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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, 609.11.5(a), 609.05.1, 609.05.2

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

Offense Level: Felony

Offense Date (on or about): 05/25/2016

Control #(ICR#): 16187414

Charge Description: That on or about May 25, 2016, in Hennepin County, Minnesota, RYAN PAUL HOWARD, acting alone or intentionally aiding, advising, hiring, counseling, or conspiring with another, and while armed with a firearm, took personal property from the person or in the presence of Victim 1, knowing that he was not entitled to the property and used and/or threatened the imminent use of force against Victim 1 to overcome his resistance or powers of resistance to or to compel acquiescence in the taking or carrying away of the property.

Minimum Sentence: 3 YEARS

**COUNT II**

**Charge: Possess Ammo/Any Firearm - Conviction or Adjudicated Delinquent for Crime of Violence**

Minnesota Statute: 624.713.1(2), with reference to: 624.713.2(b), 609.11.9

Maximum Sentence: 15 YEARS AND/OR \$30,000

Offense Level: Felony

Offense Date (on or about): 05/25/2016

Control #(ICR#): 16187414

Charge Description: That on or about May 25, 2016, in Hennepin County, Minnesota, RYAN PAUL HOWARD possessed a firearm and RYAN PAUL HOWARD has been convicted or adjudicated delinquent in this state or elsewhere of a crime of violence, First Degree Aggravated Robbery on October

4, 2007, of which the sentence or court supervision expired on or after August 1, 1993.

### COUNT III

**Charge: Assault-2nd Degree-Dangerous Weapon**

Minnesota Statute: 609.222.1, with reference to: 609.222.1, 609.11.5(a), 609.05.1, 609.05.2, 609.101.2

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

Offense Level: Felony

Offense Date (on or about): 05/25/2016

Control #(ICR#): 16187414

Charge Description: That on or about May 25, 2016, in Hennepin County, Minnesota, RYAN PAUL HOWARD, acting alone or intentionally aiding, advising, hiring, counseling, or conspiring with another, and while armed with a firearm, assaulted Victim 2.

Minimum Sentence: 3 YEARS

### COUNT IV

**Charge: Assault-2nd Degree-Dangerous Weapon**

Minnesota Statute: 609.222.1, with reference to: 609.222.1, 609.05.1, 609.05.2, 609.101.2

Maximum Sentence: 7 YEARS AND/OR \$4,200-\$14,000

Offense Level: Felony

Offense Date (on or about): 05/25/2016

Control #(ICR#): 16187414

Charge Description: That on or about May 25, 2016, in Hennepin County, Minnesota, RYAN PAUL HOWARD, acting alone or intentionally aiding, advising, hiring, counseling, or conspiring with another, and while using a dangerous weapon, assaulted Victim 1.

## STATEMENT OF PROBABLE CAUSE

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

On May 25, 2016, at approximately 10:46 pm, Minneapolis Police Officers responded to a known address located in the city of Minneapolis, Hennepin County, Minnesota, on report of a physical fight. Officers arrived and observed Victim 1, a known adult male, running out of the front of the address. Victim 1 reported that someone was probably dead inside the residence and that he had a possible broken arm. Responding officers also observed that he had an empty gun holster sticking out of the bottom of his shirt.

In the basement of the residence, officers found Victim 2, a known adult male, sitting in a tipped over recliner with his hands tied up with a white cord. Officers observed that Victim 2 had a gunshot wound to his foot and a head injury. Victim 2 reported that he had been shot in the foot, pistol whipped and water boarded. Officers also noted that there were wet bath towels near his head and the basement shower was running.

Also in the basement, officers observed Victim 3, a known adult male, lying on the floor. His hands were tied to a pillar with electrical cord and he had sustained a head injury.

Officers recovered numerous firearms and ammunition from the basement. All three victims were transported by ambulance to the hospital.

Officers subsequently spoke to Victim 1, who reported that he had stopped by the residence that evening to visit Victim 2. He reported that inside, a man later positively identified as Defendant William Carl Erickson, began walking him through the house. There were two other men with Defendant Erickson, later positively identified as Defendant Aaron Anthony Smith and RYAN PAUL HOWARD, DOB 11/30/1989, the Defendant herein. Victim 1 stated that he was walking with all three defendants when he was struck with a hard object on the back of the head. Victim 1 reported that he blacked out for a second and all three men "jumped" him, striking him with a glass Captain Morgan bottle and their fists. Victim 1 reported that they yelled "shoot him" a few times and he believed they had a gun. Victim 1 stated that he has a permit to carry and was wearing his firearm on a holster. Victim 1 reported that the defendants took his gun from him and tried to take his clothes off. Victim 1 stated that the defendants began talking about taking him downstairs and tying him up. Victim 1 stated that he observed Defendant Erickson grab a firearm off of a table but the police arrived at the house at that moment and he was able to escape.

Officers also spoke to Victim 2 who reported that all three defendants were at his residence and followed him into his bedroom. Victim 2 stated that they surrounded him and began to talk about his belongings. Victim 2 reported that they started to search his room and almost ripped his pants off trying to search his pockets. Victim 2 stated that the defendants stomped on him, tied his hands with an electrical cord and assaulted him multiple times. Victim 2 reported that the defendants had guns and told him they were going to kill him. Victim 2 stated that they threw him down the stairs to the basement and pistol whipped him. Victim 2 reported that they tied him to a recliner and began to water board him. Victim 2 stated that at some point they tied up his friend, Victim 3, and threw him down the stairs to the basement before tying him to a basement pillar and beating him up.

Victim 2 stated that he does not own any firearms but that he saw several in his basement. He reported that the defendants kept loading, unloading and cocking them. Victim 2 stated that Defendant Howard pointed a gun at him and that the defendants told him they were going to "shoot his fucking head off." Victim 2 reported that one of the defendants shot him in the foot. His view was obstructed at that point because he

was tipped upside down in the recliner. Victim 2 stated that the defendants fled when the police arrived.

Defendant Howard's criminal history reveals numerous convictions for crimes of violence. He was adjudicated delinquent of First Degree Aggravated Robbery (MNCIS #27-JV-07-11727) on October 4, 2007, and convicted of Prohibited Person in Possession of a Firearm (MNCIS #27-CR-09-30842) on August 13, 2009, First Degree Burglary (MNCIS #27-CR-11-21549) on September 12, 2011 and Third Degree Assault with Substantial Bodily Harm (MNCIS #82-CR-12-4564) on July 29, 2013.

Defendant Howard is presently in custody on another matter.

**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**

Katie Blackwell  
Police Sergeant  
350 S 5th St

Electronically Signed:  
06/02/2016 04:11 PM  
HENNEPIN County, MINNESOTA

Being authorize  
Prosecuting A



