

STATE OF MINNESOTA)
) ss. AFFIDAVIT OF DAVID CARRIKER
COUNTY OF RAMSEY)

1. I am a Special Agent with the United States Department of Justice, Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF), and have been so employed since September of 2005. I am currently assigned to the St. Paul Group IV Field Office, and work with various law enforcement agencies and drug task forces throughout the state of Minnesota. My duties and responsibilities include conducting criminal investigations of individuals and organizations who are alleged to have violated Federal laws, particularly those found in Titles 18, 21, and 26. I have participated in numerous investigations which have resulted in arrests, searches, seizures, and convictions of individuals who have violated Federal law. I successfully completed the Criminal Investigations Training Program (CITP) and the Special Agent Basic Training (SABT) Program at the Federal Law Enforcement Training Center (FLETC).

2. This affidavit is submitted for the limited purpose of establishing probable cause in support of issuing a complaint and arrest warrant for Ramone JACKSON for possession of ammunition by a felon in violation of 18 U.S.C. §§ 922(g)(1) and 924(a)(8).

3. This affidavit is based on my personal knowledge, as well as information I have learned from other law enforcement officers and the review

of reports, written materials, and recordings. This affidavit does not include all the details I have learned regarding this investigation. Rather, it only includes information believed to be sufficient to establish probable cause.

PROBABLE CAUSE

4. Working with multiple other state and federal agencies, the ATF and the Hennepin County Violent Offender Task Force (VOTF) are investigating the “Lows” street gang. The “Lows” is a north Minneapolis criminal gang that engages in drug trafficking, firearm possession, and acts of violence. The Lows are comprised of gang subsets that go by different names, including the Stick Up Boys (“SUB”). The Lows are engaged in a violent rivalry with the Highs, another Minneapolis criminal gang that engages in drug trafficking, firearm possession, and acts of violence.

5. Historically, when a member or associate of the Highs or Lows is shot at or killed, the opposing group quickly retaliates with additional shootings and murders.

6. On or around November 13, 2023, JACKSON was shot while in a vehicle in St. Paul, Minnesota. Law enforcement officers recovered approximately 38 casings of two different caliber guns. JACKSON said he was alone in the car at the time of the shooting and did not have any information about who shot him or suspect information. After this incident, JACKSON began driving a different vehicle—a Nissan sedan.

7. On or about November 29, 2023, in Brooklyn Park, Minnesota, there were approximately 50 rounds fired outside of an apartment complex involving numerous different firearms based on the calibers of the discharged cartridge casings recovered from the scene. Based on the investigation, I know that at least one automatic weapon was involved in this incident.

8. In the following days, law enforcement received information from two separate confidential reliable informants that JACKSON was involved in the November 29 shooting. These confidential individuals are considered reliable in part because they have provided reliable information to law enforcement in the past that was corroborated and useful to law enforcement. At least one confidential reliable informant told law enforcement officers that JACKSON admitted he was firing an automatic weapon during this incident, and that it was a shootout involving multiple members of the Highs and the Lows.

9. I also know through at least one confidential reliable informant that JACKSON is regularly armed with a firearm. Within the past two weeks, a confidential reliable informant has seen JACKSON with a 10mm firearm equipped with a "switch" (an attached conversion device, also known as an "auto sear," enabling a firearm to be fired as a fully automatic weapon by a single function of the trigger). According to a confidential reliable informant, JACKSON reportedly possesses and has access to multiple switches. Under

federal law, the device itself (the switch or auto sear) is considered a machinegun, as is the firearm to which it is attached.

10. On or about Saturday, December 3, 2023, two Lows members were shot and killed at a store in the Dinkytown neighborhood of Minneapolis. That double homicide investigation is active and ongoing.

11. Additionally, on or about the early morning hours of, December 3, 2023, JACKSON was with other Lows member or associates in the Uptown neighborhood of Minneapolis, Minnesota. One man JACKSON was with was shot in the head. The individual later died from his injuries. 10mm discharged cartridge casings were recovered from the scene. They were subsequent determined to be Federal 10mm casings.

12. JACKSON called 911 after the shooting. When police arrived, JACKSON was attempting to leave the area driving a gray Nissan sedan with MN license plates KSM321. The vehicle is not registered to JACKSON; however law enforcement officers had observed JACKSON driving that vehicle within a week of the shooting incident. Law enforcement impounded that vehicle because there was ammunition visible in plain sight.

13. Law enforcement officers reviewed video footage from the December 3 shooting in Uptown. In the video, JACKSON can be seen wearing a distinctive black and orange sweatshirt and white and black Nike shoes. JACKSON can be seen walking with numerous other low-end gang members.

JACKSON and the group can be seen walking away from the camera down the street. JACKSON is still identifiable in the video based on his clothing. A short time later JACKSON can be seen discharging a firearm (the video captures muzzle flashes). The 10mm discharged cartridge casings that were recovered from the shooting were in the same area JACKSON can be seen firing his weapon in the video.



Fig. 1: JACKSON wearing distinctive sweatshirt.



Fig. 2: JACKSON walking with other Lows.



Fig. 3: JACKSON in the area of the shooting.



Fig. 4: The muzzle flash visible on video.



Fig. 5: Discharged cartridge casings recovered from the scene.

14. Law enforcement officers obtained a federal warrant to search JACKSON's residence. Law enforcement officers recovered the distinctive sweatshirt and shoes JACKSON was captured on video wearing during the December 3 Uptown shooting. Law enforcement officers also found approximately \$20,000 in cash and approximately 597 grams of marijuana. Law enforcement also located but did not seize a money counter, and a narcotics scale.

15. On or around Tuesday December 5, 2023, law enforcement officers searched JACKSON's gray Nissan MN KSM321 pursuant to a state warrant, which had remained in the custody of Minneapolis Police since it was impounded following the December 3 Uptown shooting. During the search of

the vehicle law enforcement located three rounds of 10mm and .40 caliber ammunition.

16. I have reviewed available criminal history records associated with JACKSON. Based on my review of those records, I believe that JACKSON had at least the following convictions prior to December 2, 2023, each of which was punishable by imprisonment for a term exceeding one year:

Offense	Place of Conviction	Date of Conviction (On or About)
Assault with a Dangerous Weapon	Hennepin County, MN	March 3, 2021
Assault with a Dangerous Weapon	Hennepin County, MN	March 3, 2021
2nd Degree Riot	Hennepin County, MN	March 3, 2021

17. JACKSON was sentenced to 36 months' imprisonment (stayed for five years).

18. I have consulted with an ATF interstate nexus expert, who has made a preliminary determination that the CBC 10mm ammunition is not manufactured in the State of Minnesota and that Federal 10mm caliber ammunition contains a gunpowder that is not manufactured in the State of Minnesota.

19. Based on the information set forth above, there is probable cause to believe that Ramone JACKSON violated Title 18, United States Code, Sections 922(g)(1) and 924(a)(8) by possessing ammunition as a felon.

Further your Affiant sayeth not.



David Carriker
Special Agent, ATF

SUBSCRIBED and SWORN before me
by reliable electronic means via FaceTime and
email pursuant to Fed. R. Crim. P. 41(d)(3) on
December 8, 2023:



JOHN F. DOCHERTY
UNITED STATES MAGISTRATE JUDGE
DISTRICT OF MINNESOTA