

State of Minnesota
County of Hennepin

District Court
4th Judicial District

Prosecutor File No. 20A11087
Court File No. 27-CR-20-20791

State of Minnesota,

Plaintiff,

vs.

TRAVIS PATRICK WADE LEONARD DOB: 01/04/1997

1127 Irving Ave N
Minneapolis, MN 55411

Defendant.

COMPLAINT

Order of Detention

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: Murder - 2nd Degree - With Intent-Not Premeditated

Minnesota Statute: 609.19.1(1), with reference to: 609.11.5(a), 609.19.1, 609.11.9

Maximum Sentence: 40 YEARS

Offense Level: Felony

Offense Date (on or about): 09/24/2020

Control #(ICR#): 20247651

Charge Description: That on or about 9/24/2020, at 11XX Irving Ave North, Minneapolis, in Hennepin County, Minnesota, TRAVIS PATRICK WADE LEONARD, caused the death of Victim, a human being, with intent to effect the death of that person or another, but without premeditation, while using a firearm.

Minimum Sentence: 3 YEARS

COUNT II

Charge: Manslaughter - 1st Degree - Intentionally Cause Death in Heat of Passion

Minnesota Statute: 609.20(1), with reference to: 609.20, 609.11.5(a), 609.11.9

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

Offense Level: Felony

Offense Date (on or about): 09/24/2020

Control #(ICR#): 20247651

Charge Description: That on or about 9/24/2020, at 11XX Irving Avenue North, Minneapolis, in Hennepin County, Minnesota, TRAVIS PATRICK WADE LEONARD, intentionally caused the death of Victim in the heat of passion provoked by such words or acts of Victim as would provoke a person of ordinary self-control under like circumstances, while using a firearm.

Minimum Sentence: 3 YEARS

STATEMENT OF PROBABLE CAUSE

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

On September 24, 2020, at approximately 10:54pm, Minneapolis Police officers were dispatched to a single-family home, located at 11XX Irving Avenue North, Minneapolis, Hennepin County, on a report of a shooting. The homeowner, later identified as TRAVIS PATRICK WADE LEONARD, Defendant, had called 911 to report that someone had broken into his home and he shot the intruder.

Officers arrived and Defendant let them inside, telling the officers "I don't know what I did with the gun." Officers located a male, later identified as Victim, lying face down in a hallway near the back door of the residence. Victim was dressed in a black hoodie and was wearing gloves and a mask. Officers located a hatchet in Victim's hand. Victim was not breathing, so officers immediately began lifesaving measures. Officers observed that Victim had a gunshot wound to the middle back. Victim was transported to the hospital where he was declared deceased.

Victim's vehicle was located in the alley driveway of the next-door house parked facing out with Victim's dog inside the car. The rear door to Defendant's house was found to be locked.

Officers began securing Defendant's home and located Defendant's wife, C.S. holding the couple's infant child sitting on the stairs. Defendant was located in his upstairs bedroom. He claimed to be looking for his firearm and told officers he thought he might have left it in the kitchen. He told officers he would find the gun for them, but officers called him to come out and walk down the stairs. Defendant remained evasive about where the firearm was.

Officers executed a search warrant on Defendant's residence. They located a sheath to a hatchet outside of Defendant's upstairs bedroom. They also found Defendant's 9mm Smith and Wesson handgun on the floor just inside his bedroom closet. Near the gun, officers located a safe with the safe door ajar. \$13,000 in cash was found outside and on top of the safe. In an adjacent room closet, officers located a suitcase filled with a large quantity of marijuana in vacuum sealed bags and two large mason jars full of what appeared to be THC wax. Digital scales and narcotics paraphernalia were also located throughout the house.

Defendant was interviewed post-Miranda. He stated that he and C.S. were lying in bed with their child when he heard some noise downstairs and then looked up to see Victim standing in his bedroom doorway wearing a black hoodie and a mask. Victim was holding the hatchet and asked something about where the money was. Defendant stated he jumped out of bed and began wrestling with Victim. Their fighting caused them to fall down the stairs. He continued struggling with Victim in the living room and into the kitchen on the main level of the home. He claimed that at times Victim swung the hatchet at him and he was able to get out of the way. Defendant explained that he is a boxer so he knows how to dodge a blow. As he was struggling with Victim, Defendant called to C.S. to bring his gun down. Defendant claimed he was able to grab the gun while still struggling with Victim, but that he dropped the gun and he and Victim struggled over it. Eventually, he was able to grab the gun, cock it on the countertop and push Victim off enough to fire a shot that hit Victim in the stomach. Defendant claimed that Victim continued struggling with him and knocked the gun out of his hands. He claimed that he was again able to push Victim off of him enough to pick up the gun and fire off a shot from near the ground that hit Victim in the head. Defendant initially claimed he did not know who Victim was and pretended like he did not know what officers were talking about when they asked if he had dealt marijuana to Victim.

Defendant's wife, C.S., was interviewed and gave a different account. She acknowledged that Defendant

sold marijuana out of the house. She confirmed that she was in bed with Defendant and their child when Victim appeared in their doorway holding a hatchet. She said Victim asked something about the money and that Defendant started to struggle with Victim and their fight proceeded downstairs while she remained upstairs with the child. When Defendant called C.S. to bring him his gun, C.S. stated she saw Defendant downstairs pinning Victim down on the ground and beating him. C.S. described Defendant as having beaten Victim up pretty good and that Defendant clearly had the upper hand. Defendant asked her to shoot Victim, but she declined and handed the gun to Defendant before she went back upstairs. C.S. then heard one gunshot, followed by Victim's voice telling Defendant to kill him and end his life. Victim then heard a second gunshot.

Defendant was confronted with the inconsistencies between his account and C.S.'s account. He finally acknowledged that he knew Victim and had sold marijuana to Victim a quarter pound at a time. Victim had been to his house several times. Defendant admitted that he had stopped talking to Victim over a month before this incident because Victim started suggesting that the two of them branch out by robbing other drug dealers. Defendant said he didn't want his business to go in that direction, so he cut Victim off. Defendant continued to say that when C.S. brought him the gun he was still struggling with Victim while standing and that he shot Victim in the stomach. He claimed that Victim continued to struggle with him so he hit Victim in the head with the gun several times. Eventually he said that Victim fell to the floor and he realized who it was. Victim no longer had the hatchet in his hand. Defendant then became angered when he realized that it was Victim who endangered his family and told Victim to get out of there. He said Victim replied that he couldn't walk or feel his legs so he told Defendant "Just end me. Just end me now." Defendant admitted he shot Victim in the back of the head while he laid immobile facing down. Defendant acknowledged that he planted the hatchet back in Victim's hand to make it look like he had still been a threat. Defendant also admitted he then went upstairs and started packing up all of his marijuana to hide before calling the police.

An autopsy of Victim determined that Victim had suffered two gunshot wounds, but Victim was not shot in the stomach or the front of the head. Both shots were to the back side of his body. One gunshot entered his back near the midline and traveled back to front without exiting the body. This bullet completely transected Victim's spinal cord, but would not have been immediately fatal. The second gunshot entered the back of Victim's head near the midline. The bullet traveled back to front and slightly downward.

Defendant is in custody.

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

Mark Suchta
Sergeant
350 S 5th St
Minneapolis, MN 55415-1389
Badge: 6995

Electronically Signed:
09/28/2020 11:56 AM
Hennepin County, Minnesota

Being authorized to prosecute the offenses charged, I approve this complaint.

Prosecuting Attorney

James Hanneman
300 S 6th St
Minneapolis, MN 55487
(612) 348-5550

Electronically Signed:
09/28/2020 11:40 AM

FINDING OF PROBABLE CAUSE

From the above sworn facts, and any supporting affidavits or supplemental sworn testimony, I, the Issuing Officer, have determined that probable cause exists to support, subject to bail or conditions of release where applicable, Defendant's arrest or other lawful steps be taken to obtain Defendant's appearance in court, or Defendant's detention, if already in custody, pending further proceedings. Defendant is therefore charged with the above-stated offense(s).

SUMMONS

THEREFORE YOU, THE DEFENDANT, ARE SUMMONED to appear on _____, _____ at _____ AM/PM before the above-named court at the address listed on the attached court summons to answer this complaint.

IF YOU FAIL TO APPEAR in response to this SUMMONS, a WARRANT FOR YOUR ARREST shall be issued.

WARRANT

To the Sheriff of the above-named county; or other person authorized to execute this warrant: I order, in the name of the State of Minnesota, that the Defendant be apprehended and arrested without delay and brought promptly before the court (if in session), and if not, before a Judge or Judicial Officer of such court without unnecessary delay, and in any event not later than 36 hours after the arrest or as soon as such Judge or Judicial Officer is available to be dealt with according to law.

Execute in MN Only

Execute Nationwide

Execute in Border States

ORDER OF DETENTION

Since the Defendant is already in custody, I order, subject to bail or conditions of release, that the Defendant continue to be detained pending further proceedings.

Bail: \$1,000,000.00

Conditions of Release: No Possession of Weapons

This complaint, duly subscribed and sworn to or signed under penalty of perjury, is issued by the undersigned Judicial Officer as of the following date: September 28, 2020.

Judicial Officer

Luis Bartolomei
District Court Judge

Electronically Signed: 09/28/2020 12:14 PM

Sworn testimony has been given before the Judicial Officer by the following witnesses:

**COUNTY OF HENNEPIN
STATE OF MINNESOTA**

State of Minnesota

Plaintiff

vs.

TRAVIS PATRICK WADE LEONARD

Defendant

*LAW ENFORCEMENT OFFICER RETURN OF SERVICE
I hereby Certify and Return that I have served a copy of this Order of
Detention upon the Defendant herein named.*

Signature of Authorized Service Agent:

DEFENDANT FACT SHEET

Name: TRAVIS PATRICK WADE LEONARD
DOB: 01/04/1997
Address: 1127 Irving Ave N
Minneapolis, MN 55411

Alias Names/DOB:

SID: MN20CK9119

Height:

Weight:

Eye Color:

Hair Color:

Gender: MALE

Race: White

Fingerprints Required per Statute: Yes

Fingerprint match to Criminal History Record: Yes

Driver's License #:

SILS Person ID #: 833163

SILS Tracking No. 3188890

Alcohol Concentration:

STATUTE AND OFFENSE GRID

Cnt Nbr	Statute Type	Offense Date(s)	Statute Nbrs and Descriptions	Offense Level	MOC	GOC	Controlling Agencies	Case Numbers
1	Charge	9/24/2020	609.19.1(1) Murder - 2nd Degree - With Intent-Not Premeditated	Felony	H2012		MN0271100	20247651
	Modifier	9/24/2020	609.11.9 Minimum Sentences of Imprisonment - Applicable Offenses	No-Level	H2012		MN0271100	20247651
	Penalty	9/24/2020	609.19.1 Murder - 2nd Degree	Felony	H2012		MN0271100	20247651
	Penalty	9/24/2020	609.11.5(a) Minimum Sentences of Imprisonment-Firearm Use or Possession	Felony	H2012		MN0271100	20247651
2	Charge	9/24/2020	609.20(1) Manslaughter - 1st Degree - Intentionally Cause Death in Heat of Passion	Felony	H4012		MN0271100	20247651
	Modifier	9/24/2020	609.11.9 Minimum Sentences of Imprisonment - Applicable Offenses	No-Level	H4012		MN0271100	20247651
	Penalty	9/24/2020	609.11.5(a) Minimum Sentences of Imprisonment-Firearm Use or Possession	Felony	H4012		MN0271100	20247651
	Penalty	9/24/2020	609.20 Manslaughter - 1st Degree	Felony	H4012		MN0271100	20247651