
STATE OF MINNESOTA**DISTRICT COURT****COUNTY OF RAMSEY****SECOND JUDICIAL DISTRICT**
Case Type: Other Civil

The County of Ramsey by its County
Attorney, John Choi, and The State of
Minnesota by its Attorney General, Keith
Ellison,**Court File No.:**

Plaintiffs,

COMPLAINT

v.

Muddy; a criminal gang, sued as an
unincorporated association,

Defendant.

I. INTRODUCTION.

1. This is an action for injunctive relief under Minnesota Statutes sections 617.91-617.97, commonly referred to as the “Minnesota civil gang nuisance law,” and for declaratory relief under the Uniform Declaratory Judgment Act, Minnesota Statutes section 555.01 et. seq. Plaintiffs seek a judicial determination that Defendant, a “criminal gang” as defined under Minnesota Statutes section 617.91, subdivision 3, has created a public nuisance as defined in Minnesota Statutes section 617.92, subdivision 1, at the Minnesota State Fair. To abate this public nuisance at the upcoming 2026 Minnesota State Fair, Plaintiffs seek to enjoin Defendant and its members from engaging in certain nuisance-causing conduct within a defined “Safety Zone,” an area encompassing the State Fairgrounds and the immediate vicinity used by members of the public and State Fair visitors for parking and transit for the event. Plaintiffs ask the Court to impose these restrictions on the Defendant and its members for the duration of the State Fair and the morning

after. Plaintiffs' proposed "Safety Zone" is depicted in the Appendix to this Complaint.

II. PARTIES

2. Plaintiff Ramsey County is a municipal corporation of the State of Minnesota and a home rule charter County pursuant to the Minnesota Constitution Article 12 section 4 and Minnesota Statutes section 410.04, and is authorized to bring this action pursuant to Minnesota Statutes section 617.93(a) along with the Minnesota Attorney General's Office.

3. Plaintiff State of Minnesota is a sovereign state, represented through its chief legal officer, Attorney General Keith Ellison, who is authorized to bring this action pursuant to Minnesota Statutes sections 8.01 and 617.93(a).

4. Defendant is part of an unincorporated association consisting of two or more persons who are residents of Minnesota and who associate and act within Minnesota under a common name pursuant to Minnesota Statutes section 540.151 and 540.152.

III. JURISDICTION AND VENUE

5. The Court has jurisdiction to decide Plaintiffs' claims pursuant to Minnesota Statute sections 617.91-617.97 and the Uniform Declaratory Judgment Act, Minnesota Statute section 555.01 et. seq, Minnesota common law and, with respect to Plaintiff State of Minnesota, Minnesota Statutes section 8.01 and the State's *parens patriae* authority.

6. Venue is proper with this Court pursuant to Minnesota Statute section 542.09.

COUNT I

DEFENDANT IS A PUBLIC NUISANCE AND ENGAGES IN PUBLIC NUISANCE ACTIVITIES DURING THE MINNESOTA STATE FAIR (Minn. Stat. § 617.92 Subd. 1)

7. Plaintiffs re-allege all prior paragraphs of this Complaint.

8. Defendant is a "criminal gang" as defined in Minnesota Statutes section 609.229, because

it is an ongoing organization, association, or group of at least three people that (1) has as a primary activity the commission of offenses listed in Minnesota Statutes section 609.11, subd. 9, namely, aggravated assault, drive-by shootings, and weapons violations; (2) has a common name; and (3) includes members who have engaged in a pattern of criminal activity.

9. Defendant has “continuously and regularly” engaged in “gang activities” as those respective terms are defined in Minnesota Statutes section 617.91, subdivisions 2 and 4, including the “Safety Zone.” Examples of gang activities engaged in by Defendant and its individual members on a continuous and regular basis are the following:

- i) On June 28, 2025, Muddy gang members assaulted rival gang members in Qamiria Coffee shop. During this incident chairs were thrown and damage was done to the property. This incident resulted in the arrest of Muddy gang members and charges brought include 3rd degree riot.
- ii) On June 6, 2025. Muddy gang members were arrested in connection with firing gunshots at rival gang members at a Burnsville High school graduation.
- iii) On May 4, 2026, Muddy gang members were arrested in connection with the Metro State Graduation shooting which was the result of a conflict between Muddy and their rival The Ville. The charges brought against Muddy members include 1st degree assault, 2nd degree assault, and 2nd degree riot.
- iv) On June 27, 2026 Muddy gang members were stopped at a Somali Independence Day community festival for carrying handguns with extended magazines. The individuals stopped were seen roaming the perimeter of the event as if they were conducting surveillance rather than participating in the festivities. This behavior is consistent with past behaviors seen from Muddy members that have led to violent confrontations with their rival gangs.

10. Defendant has created a public nuisance under Minnesota Statutes section 617.91, subdivision 1, in Minnesota, including within the Safety Zone.

11. Each of the individuals identified in Exhibit A are members of the Defendant’s criminal gang and are actively involved in the Defendant’s gang activities.

12. Plaintiffs are explicitly and statutorily entitled pursuant to Minnesota Statute section 617.94, to either a temporary or permanent Order from this Court: a) enjoining Defendant from engaging in its gang activities; and b) imposing other reasonable requirements to prevent Defendant from engaging in future gang activities.

13. Defendant has intentionally and purposefully engaged in gang activities that constitutes a public nuisance as set forth in Minnesota Statutes section 617.91, subdivision 1. Defendant engages in such gang activities throughout the Twin Cities metropolitan area, including the Safety Zone. These gang activities include: (1) a shooting committed by a Muddy gang member against Muddy gang rivals on the last day of the 2024 State Fair, just outside the State Fairgrounds perimeter, and (2) multiple assaults and brawls carried out between Muddy and rival gang members on the last day of the 2025 State Fair.

14. Defendant, on information and belief, intends to continue its public nuisance activities within the Safety Zone during the 2026 Minnesota State Fair.

PRAYER FOR RELIEF

WHEREFORE, Ramsey County, by its County Attorney John Choi, and the State of Minnesota, by its Attorney General Keith Ellison, respectfully request that judgment be entered in favor of Plaintiffs and against Defendant and all of its members, including each of the individuals identified in Exhibit G, jointly and severally, as follows:

1. For the following declaratory relief:
 - a. A declaration that Defendant is a “criminal gang” as defined in Minnesota Statutes section 609.229 that has “continuously and regularly” engaged in “gang activities” as those respective terms are defined in Minnesota Statutes section 617.91, subdivisions 2 and 4.

- b. A declaration that each of the individuals identified in Exhibit A are members of Defendant's criminal gang.
 - c. A declaration that Defendant intentionally and purposefully engages in public nuisance activities as defined in Minnesota Statutes section 617.91, subdivision 1.
 - d. A declaration that Plaintiff is explicitly and statutorily entitled pursuant to Minnesota Statutes section 617.94, to either a temporary or permanent Order from this Court: a) enjoining Defendant from engaging in its gang activities; and b) imposing other reasonable requirements to prevent Defendant from engaging in future gang activities.
2. For the following injunctive relief:
- a. An Order Granting Temporary Injunction in which all of the persons identified in Exhibit A, (collectively referred to as the "Enjoined Persons," or singularly as an "Enjoined Person") are enjoined, prohibited and restrained from engaging in or performing directly or indirectly, any of the following activities in the Safety Zone, between 8:00 A.M. August 27, 2026, and 06:00 A.M. September 8, 2026:
 - i. **No Association With Known Criminal Gang Members:** Associating, standing, sitting, walking, driving, bicycling, gathering or appearing, anywhere in public view or any place accessible to the public, with any of the Enjoined Persons or other members of the Defendant criminal gang known as Muddy, known to an Enjoined Person to be a member of the Defendant criminal gang known as Muddy, but not including

when such described individuals are inside a church.

ii. **No Intimidation:** Confronting, intimidating, annoying, harassing, threatening, challenging, provoking, assaulting or battering any person known to be a witness to, known to be a victim of, or known to have complained about any of the criminal gang activities of the Defendant criminal gang known as the Muddy; and

3. For such other and further relief as the Court deems just and equitable.

JOHN CHOI COUNTY ATTORNEY
RAMSEY COUNTY, MINNESOTA

Dated: August 5, 2026

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ACKNOWLEDGMENT

The County of Ramsey, by its attorney, hereby acknowledges that costs, disbursements, and reasonable attorney and witness fees may be awarded to defendant in this action pursuant to Minn. Stat. §549.211.

JOHN CHOI COUNTY ATTORNEY
RAMSEY COUNTY, MINNESOTA

Dated: August 5, 2026

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