

STATE OF MINNESOTA  
COUNTY OF HENNEPIN

DISTRICT COURT  
FOURTH JUDICIAL DISTRICT

State of Minnesota,

Court File No. 27-CR-24-1844

Plaintiff,

v.

**DEFENDANT RYAN LONDREGAN'S  
NOTICE OF DEFENSES PURSUANT TO  
MINN. R. CRIM. P. 9.02, SUBD. 1(5)**

Ryan Londregan,

Defendant.

Trooper Londregan provides the State with the following defenses pursuant to Minn. R. Crim. P. 9.02, Subd. 1(5). This notice is provided subject to Trooper Londregan's motion to dismiss the State's complaint, or alternatively, disqualify the Hennepin County Attorney's Office for abuse of the grand-jury process.

As will be shown at trial (if trial proves to be necessary), Trooper Londregan employed the use of deadly force against Ricky Cobb II ("Cobb") to protect: (1) Trooper Brett Seide ("Seide") from death and/or great bodily harm; and secondarily, (2) himself from death and/or great bodily harm. *See* Minn. Stat. § 609.066, Subds. 2(a)(1) & (2). Trooper Londregan will come forward with evidence showing that he acted in accordance with Minn. Stat. § 609.066, Subds. 2(a)(1) & (2),<sup>1</sup> and this evidence will include, but not be limited to, the following facts:

1. Before using deadly force, Trooper Londregan reviewed a Keep Our Police Safe

<sup>1</sup> Once a defendant comes forward with evidence to support a claim of (1) defense-of-another; or (2) self-defense, *the State* bears the burden of proving, beyond a reasonable doubt, that the defendant did not act in defense-of-another *or* in self-defense. *State v. Basting*, 572 N.W.2d 281, 285 (Minn. 1997); accord *State v. Valdez*, No. A22-1424, 2023 WL 6799150, 2023 Minn. App. LEXIS 374, at \*9 (Minn. Ct. App. Oct. 16, 2023).

- (“KOPS”) alert that specified, among other things, that Cobb was: (a) wanted for a felony violation of an Order for Protection; (b) a registered/convicted predatory offender; and (c) prohibited from possessing a firearm.<sup>2</sup>
2. Before using deadly force, Trooper Seide informed Trooper Londregan that he communicated with a Ramsey County Duty Sergeant, and the Sergeant: (a) stated that the KOPS alert remained correct; and (b) requested Trooper Seide arrest Cobb.
  3. As Trooper Seide indicated in his written statement provided to the Minnesota Bureau of Criminal Apprehension (“BCA”), among other things:
    - a. Trooper Seide entered Cobb’s vehicle to physically remove him from the vehicle. With his upper body inside the vehicle, the vehicle lurched forward as Trooper Seide attempted to gain physical control of Cobb. Around this time, Trooper Seide heard Trooper Londregan yell at Cobb to “get out of the car now.”
    - b. As Trooper Seide told the BCA: “I then could feel the vehicle accelerate forward. As the vehicle accelerated, I started feeling myself getting pulled with the vehicle. I feared for my safety and my life as Cobb accelerated with me half inside the vehicle. My upper torso was inside the car while my legs and feet were outside. As the vehicle increased speed I tried run alongside so as not to fall and get run over. At that time, I knew that Trooper Londregan and I were in danger of being run over by Cobb’s car, being hit by an oncoming car on the highway, or otherwise being dragged away at a high rate of speed. Any of these scenarios were extremely dangerous and would likely lead to serious injuries or death to of any of us. During this time, I heard at least one gunshot. I continued to try and maintain my balance as Cobb accelerated with the hopes of apprehending him. However, Cobb continued to speed up and eventually I lost my footing and fell violently to the ground.”
    - c. Trooper Seide concluded his written statement to the BCA with the following: “Cobb’s conduct was terrifying, dangerous, and lethal force was needed before he could kill me and Trooper Londregan. Cobb posed an enormous threat to public safety.”

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<sup>2</sup> See Bureau of Criminal Apprehension, *BCA Data Access Policy & Inventory* 19 (Aug. 2023) (describing “Keep Our Police Safe” as “[d]ata from ‘attempt to locate’ and ‘be on the lookout’ messages to law enforcement agencies.”) (available at <https://dps.mn.gov/divisions/bca/Documents/Data-Access-Policy-and-Inventory.pdf#search=KOPS>).

4. As Trooper Garrett Erickson indicated in his written statement provided to the BCA, among other things:
  - a. “As soon as Trooper Seide opened the door, I observed the vehicle begin to move forward. Trooper Seide struggled with him inside the vehicle. The vehicle stopped for a short period of time then began to accelerate. The second time the vehicle began to accelerate, it visually appeared to be at a much higher rate of speed. It became clear that [Cobb] was attempting to drive the vehicle away from the scene. I observed Trooper Seide being pulled by the vehicle as it was driving away. From the position in which I was standing, I was unsure if Trooper Seide was holding onto [Cobb] or if he somehow stuck inside the vehicle. Due to the fact that Trooper Seide was inside the vehicle, I was concerned that Trooper Seide was in an extremely vulnerable position. I feared for Trooper Seide’s life because he could fall out and be run over, or that Trooper Seide would be trapped in the vehicle for an unknown amount of time traveling down the freeway. I could hear what I believed to be three gunshots from inside the vehicle.”
  - b. “I observed Trooper Seide fall out of the vehicle onto the roadway from the driver’s side. Trooper Seide was not able to stay on his feet and fell onto the freeway. I also observed Trooper Londregan fall out of the vehicle on the passenger side. Trooper Londregan also was not able to stay on his feet and fell onto the ground.”

It is believed, but not yet definitively known, that in December 2023, Troopers Seide and Erickson each provided testimony, under oath, to a grand jury that verified the above-described statements. Consequently, the Hennepin County Attorney’s decision to bypass the grand jury and make her own decision to charge Trooper Londregan speaks volumes, i.e., it demonstrates that Hennepin County’s citizens understand Trooper Londregan did nothing wrong, so the Hennepin County Attorney decided to end-run the grand jury in order to manufacture charges against Trooper Londregan.

Trooper Londregan respectfully reserves the right to amend this notice.

DATED: January 24, 2024

Respectfully Submitted,

**MADL PA**

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