

IN THE IOWA DISTRICT COURT FOR SCOTT COUNTY

STATE OF IOWA	CRIMINAL NO. FECR454407
	CRIMINAL NO. FECR454414
	CRIMINAL NO. FECR454602
PLAINTIFF	TRIAL INFORMATION
VS.	
DANNY WILLIAM HOWARD, JR, RAYMOND LEE ROBINSON, JR. and DRAKE AUSTIN HOWARD,	
DEFENDANT	

COMES NOW, KELLY G. CUNNINGHAM, as County Attorney of Scott County, State of Iowa, and in the name and by the authority of the State of Iowa, accuses DANNY WILLIAM HOWARD, JR, RAYMOND LEE ROBINSON, JR. and DRAKE AUSTIN HOWARD, of the following crime(s):

COUNT 1:

MURDER IN THE FIRST DEGREE (CLASS A FORCIBLE FELONY)

The said DANNY WILLIAM HOWARD, JR and RAYMOND LEE ROBINSON, JR. on or about the 28th day of November 2025 in the County of Scott, and State of Iowa, **did with malice aforethought, did willfully, deliberately, and with premeditation kill another person, or in the alternative, did kill another person while participating in a forcible felony, or did aid and abet another in the commission of the offense, or, acting in concert with one another, did knowingly participate in a public offense, to-wit:** with malice aforethought, did willfully, deliberately, and with premeditation kill Damien Howard, or in the alternative, did kill Damien Howard while participating in the forcible felony, or did aid and abet another in the commission of the offense, or, acting in concert with one another, did knowingly participate in a

public offense in violation of Sections 707.1, 707.2(1)(a), 707.2(1)(b), 702.11, 702.13, 703.1 and 703.2 of the Code of Iowa.

COUNT 2:

MURDER IN THE FIRST DEGREE (CLASS A FORCIBLE FELONY)

The said DANNY WILLIAM HOWARD, JR and RAYMOND LEE ROBINSON, JR. on or about the 28th day of November 2025 in the County of Scott, and State of Iowa, **did with malice aforethought, did willfully, deliberately, and with premeditation kill another person, or in the alternative, did kill another person while participating in a forcible felony, or did aid and abet another in the commission of the offense, or, acting in concert with one another, did knowingly participate in a public offense, to-wit:** with malice aforethought, did willfully, deliberately, and with premeditation kill Dane Howard, or in the alternative, did kill Damien Howard while participating in the forcible felony, or did aid and abet another in the commission of the offense, or, acting in concert with one another, did knowingly participate in a public offense in violation of Sections 707.1, 707.2(1)(a), 707.2(1)(b), 702.11, 702.13, 703.1 and 703.2 of the Code of Iowa.

COUNT 3:

**ASSAULT WHILE PARTICIPATING IN A FELONY CAUSING SERIOUS INJURY
(CLASS C FORCIBLE FELONY AS AN HABITUAL OFFENDER)**

The said DANNY WILLIAM HOWARD, JR and RAYMOND LEE ROBINSON, JR. on or about the 28th day of November 2025 in the County of Scott, and State of Iowa, **did commit an assault as defined in Section 708.1 of the Iowa Code while participating in a felony, thereby causing serious injury to any person, or did aid and abet another in the commission of the offense, or, acting in concert with one another, did knowingly participate**

in a public offense, to-wit: the defendants, during the commission of the crime of Intimidation with a Dangerous Weapon, did assault Damien Howard and did thereby cause serious injury to Damien Howard, or did aid and abet another in the commission of the offense, or, acting in concert with one another, did knowingly participate in a public offense, in violation of Sections 708.3(1), 708.1(2)(a), (b) or (c), 703.1 and 703.2 of the Code of Iowa.

COUNT 4:

**ASSAULT WHILE PARTICIPATING IN A FELONY CAUSING SERIOUS INJURY
(CLASS C FORCIBLE FELONY AS AN HABITUAL OFFENDER)**

The said DANNY WILLIAM HOWARD, JR and RAYMOND LEE ROBINSON, JR. on or about the 28th day of November 2025 in the County of Scott, and State of Iowa, **did commit an assault as defined in Section 708.1 of the Iowa Code while participating in a felony, thereby causing serious injury to any person, or did aid and abet another in the commission of the offense, or, acting in concert with one another, did knowingly participate in a public offense, to-wit:** the defendants, during the commission of the crime of Intimidation with a Dangerous Weapon, did assault Dane Howard and did thereby cause serious injury to Damien Howard, or did aid and abet another in the commission of the offense, or, acting in concert with one another, did knowingly participate in a public offense, in violation of Sections 708.3(1), 708.1(2)(a), (b) or (c), 703.1 and 703.2 of the Code of Iowa.

COUNT 5:

INTIMIDATION WITH A DANGEROUS WEAPON (CLASS C FORCIBLE FELONY)

The said DANNY WILLIAM HOWARD, JR and RAYMOND LEE ROBINSON, JR. on or about the 28th day of November 2025 in the County of Scott, and State of Iowa, **did, with the intent to injure or provoke fear or anger in another, shoot, throw, launch, or discharge a dangerous weapon at, into, or in a building, vehicle, airplane, railroad engine, railroad car,**

or boat, occupied by another person, or within an assembly of people, and thereby place the occupants or people in reasonable apprehension of serious injury or threaten to commit such an act under circumstances raising a reasonable expectation that the threat will be carried out, or did aid and abet another in the commission of the offense, or, acting in concert with one another, did knowingly participate in a public offense, to wit: the

defendants fired multiple gunshots into an assembly of people, and thereby placed said people in reasonable apprehension of serious injury, or did aid and abet another in the commission of the offense, or, acting in concert with one another, did knowingly participate in a public offense, resulting in Damien Howard being struck by gunfire, in violation of Section 708.6(1) of the Code of Iowa.

COUNT 6:

INTIMIDATION WITH A DANGEROUS WEAPON (CLASS C FORCIBLE FELONY)

The said DANNY WILLIAM HOWARD, JR and RAYMOND LEE ROBINSON, JR. on or about the 28th day of November 2025 in the County of Scott, and State of Iowa, **did, with the intent to injure or provoke fear or anger in another, shoot, throw, launch, or discharge a dangerous weapon at, into, or in a building, vehicle, airplane, railroad engine, railroad car, or boat, occupied by another person, or within an assembly of people, and thereby place the occupants or people in reasonable apprehension of serious injury or threaten to commit such an act under circumstances raising a reasonable expectation that the threat will be carried out, or did aid and abet another in the commission of the offense, or, acting in concert with one another, did knowingly participate in a public offense, to wit:** the

defendants fired multiple gunshots into an assembly of people, and thereby placed said people in reasonable apprehension of serious injury, or did aid and abet another in the commission of the

offense, or, acting in concert with one another, did knowingly participate in a public offense, resulting in Dane Howard being struck by gunfire, in violation of Section 708.6(1) of the Code of Iowa.

COUNT 7:

INTIMIDATION WITH A DANGEROUS WEAPON (CLASS C FORCIBLE FELONY)

The said DANNY WILLIAM HOWARD, JR and RAYMOND LEE ROBINSON, JR. on or about the 28th day of November 2025 in the County of Scott, and State of Iowa, **did, with the intent to injure or provoke fear or anger in another, shoot, throw, launch, or discharge a dangerous weapon at, into, or in a building, vehicle, airplane, railroad engine, railroad car, or boat, occupied by another person, or within an assembly of people, and thereby place the occupants or people in reasonable apprehension of serious injury or threaten to commit such an act under circumstances raising a reasonable expectation that the threat will be carried out, or did aid and abet another in the commission of the offense, or, acting in concert with one another, did knowingly participate in a public offense, to wit:** the defendants fired multiple gunshots into an assembly of people, and thereby placed said people in reasonable apprehension of serious injury, or did aid and abet another in the commission of the offense, or, acting in concert with one another, did knowingly participate in a public offense, resulting in Jesse Howard being struck by gunfire, in violation of Section 708.6(1) of the Code of Iowa.

COUNT 8:

INTIMIDATION WITH A DANGEROUS WEAPON (CLASS C FORCIBLE FELONY)

The said DANNY WILLIAM HOWARD, JR and RAYMOND LEE ROBINSON, JR. on or about the 28th day of November 2025 in the County of Scott, and State of Iowa, **did, with the**

intent to injure or provoke fear or anger in another, shoot, throw, launch, or discharge a dangerous weapon at, into, or in a building, vehicle, airplane, railroad engine, railroad car, or boat, occupied by another person, or within an assembly of people, and thereby place the occupants or people in reasonable apprehension of serious injury or threaten to commit such an act under circumstances raising a reasonable expectation that the threat will be carried out, or did aid and abet another in the commission of the offense, or, acting in concert with one another, did knowingly participate in a public offense, to wit: the

defendants fired multiple gunshots into an assembly of people, and thereby placed said people in reasonable apprehension of serious injury, or did aid and abet another in the commission of the offense, or, acting in concert with one another, did knowingly participate in a public offense, resulting in Esmerelda Garcia being struck by gunfire, in violation of Section 708.6(1) of the Code of Iowa.

COUNT 9:

GOING ARMED WITH INTENT (CLASS D FELONY)

The said DANNY WILLIAM HOWARD, JR and RAYMOND LEE ROBINSON, JR. on or about the 28th day of November 2025 in the County of Scott, and State of Iowa, **did go armed with a dangerous weapon with the intent to use without justification such weapon against the person of another, or did aid and abet another in the commission of the offense, or, acting in concert with one another, did knowingly participate in a public offense, to wit:** the defendants did go armed with a dangerous weapon with the intent to use without justification such weapon against Damien Howard, or did aid and abet another in the commission of the offense, or, acting in concert with one another, did knowingly participate in a public offense, all in violation of Section 708.8, 703.1 and 703.2 of the Code of Iowa.

COUNT 10:

GOING ARMED WITH INTENT (CLASS D FELONY)

The said DANNY WILLIAM HOWARD, JR and RAYMOND LEE ROBINSON, JR. on or about the 28th day of November 2025 in the County of Scott, and State of Iowa, **did go armed with a dangerous weapon with the intent to use without justification such weapon against the person of another, or did aid and abet another in the commission of the offense, or, acting in concert with one another, did knowingly participate in a public offense, to wit:** the defendants did go armed with a dangerous weapon with the intent to use without justification such weapon against Dane Howard, or did aid and abet another in the commission of the offense, or, acting in concert with one another, did knowingly participate in a public offense, all in violation of Section 708.8, 703.1 and 703.2 of the Code of Iowa.

COUNT 11:

**USE OF A DANGEROUS WEAPON IN THE COMMISSION OF A CRIME
(AGGRAVATED MISDEMEANOR)**

The said DANNY WILLIAM HOWARD, JR and RAYMOND LEE ROBINSON, JR. on or about the 28th day of November 2025 in the County of Scott, and State of Iowa, **did go armed with a dangerous weapon on or about their person, and who used the dangerous weapon in the commission of a crime, or did aid and abet another in the commission of the offense, or, acting in concert with one another, did knowingly participate in a public offense, to wit:** the defendants did go armed with a dangerous weapon which they used in the commission of the crime of Murder in the First Degree, Going Armed With Intent, and/or Assault While Participating in a Felony Resulting in Serious Injury against Damien Howard, or did aid and abet another in the commission of the offense, or, acting in concert with one another,

did knowingly participate in a public offense, in violation of Sections 724.4, 703.1 and 703.2 of the Code of Iowa.

COUNT 12:

**USE OF A DANGEROUS WEAPON IN THE COMMISSION OF A CRIME
(AGGRAVATED MISDEMEANOR)**

The said DANNY WILLIAM HOWARD, JR and RAYMOND LEE ROBINSON, JR. on or about the 28th day of November 2025 in the County of Scott, and State of Iowa, **did go armed with a dangerous weapon on or about their person, and who used the dangerous weapon in the commission of a crime, or did aid and abet another in the commission of the offense, or, acting in concert with one another, did knowingly participate in a public offense, to wit:** the defendants did go armed with a dangerous weapon which they used in the commission of the crime of Murder in the First Degree, Going Armed With Intent, and/or Assault While Participating in a Felony Resulting in Serious Injury against Dane Howard, or did aid and abet another in the commission of the offense, or, acting in concert with one another, did knowingly participate in a public offense, in violation of Sections 724.4, 703.1 and 703.2 of the Code of Iowa.

COUNT 13:

ACCESSORY AFTER THE FACT (CLASS D FELONY)

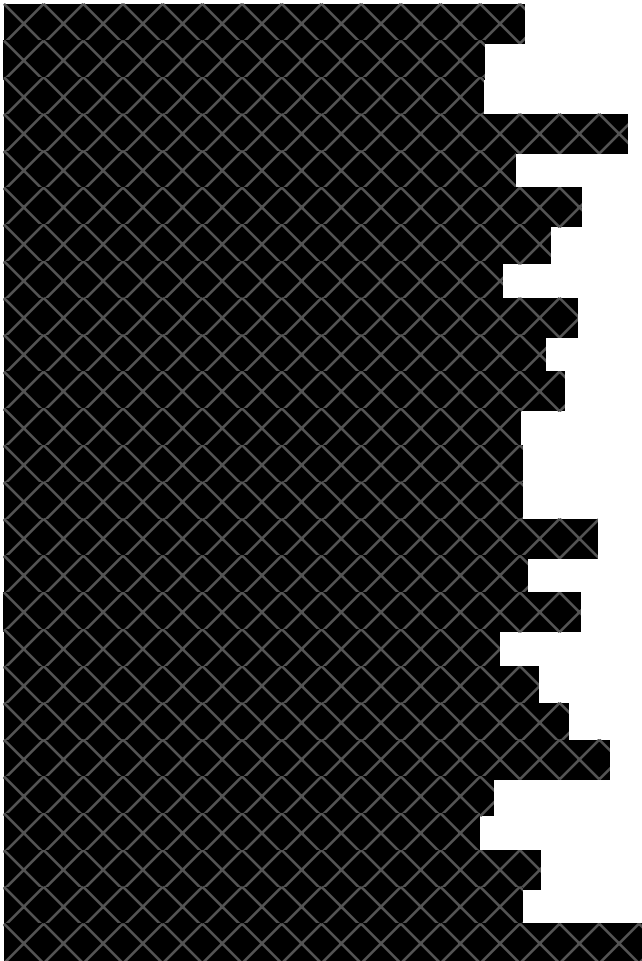
The said DRAKE AUSTIN HOWARD, on or about the 28th day of November 2025 in the County of Scott, and State of Iowa, **did, having knowledge that a crime had been committed, and that a certain person committed the murder, and who did not stand in the relation of husband or wife to the person who committed the offense, did harbor, aid, or conceal the person who committed the offense, with the intent to prevent the apprehension**

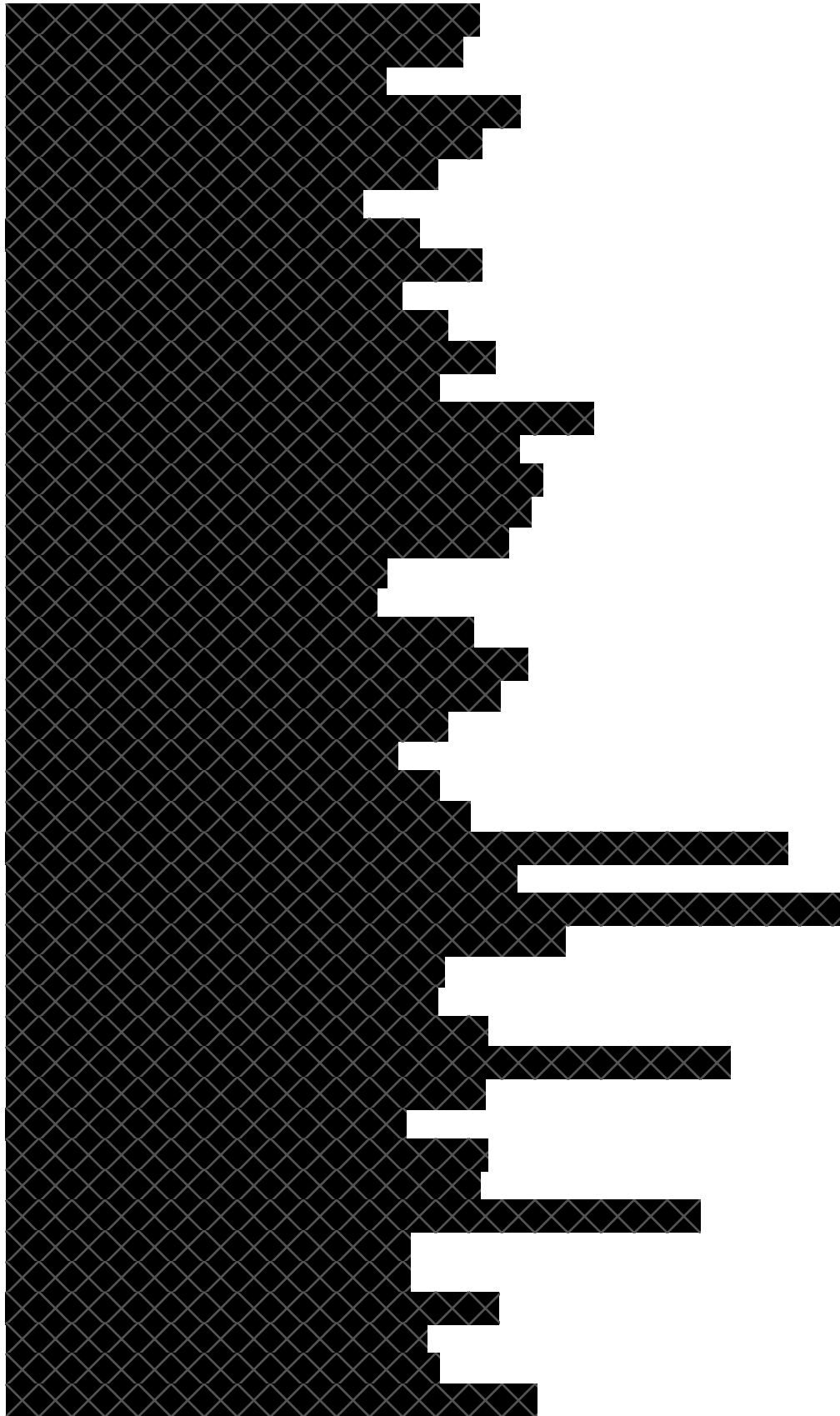
of the person who committed the offense, the public offense being murder, in violation of
Section 703.3(1) of the Code of Iowa.

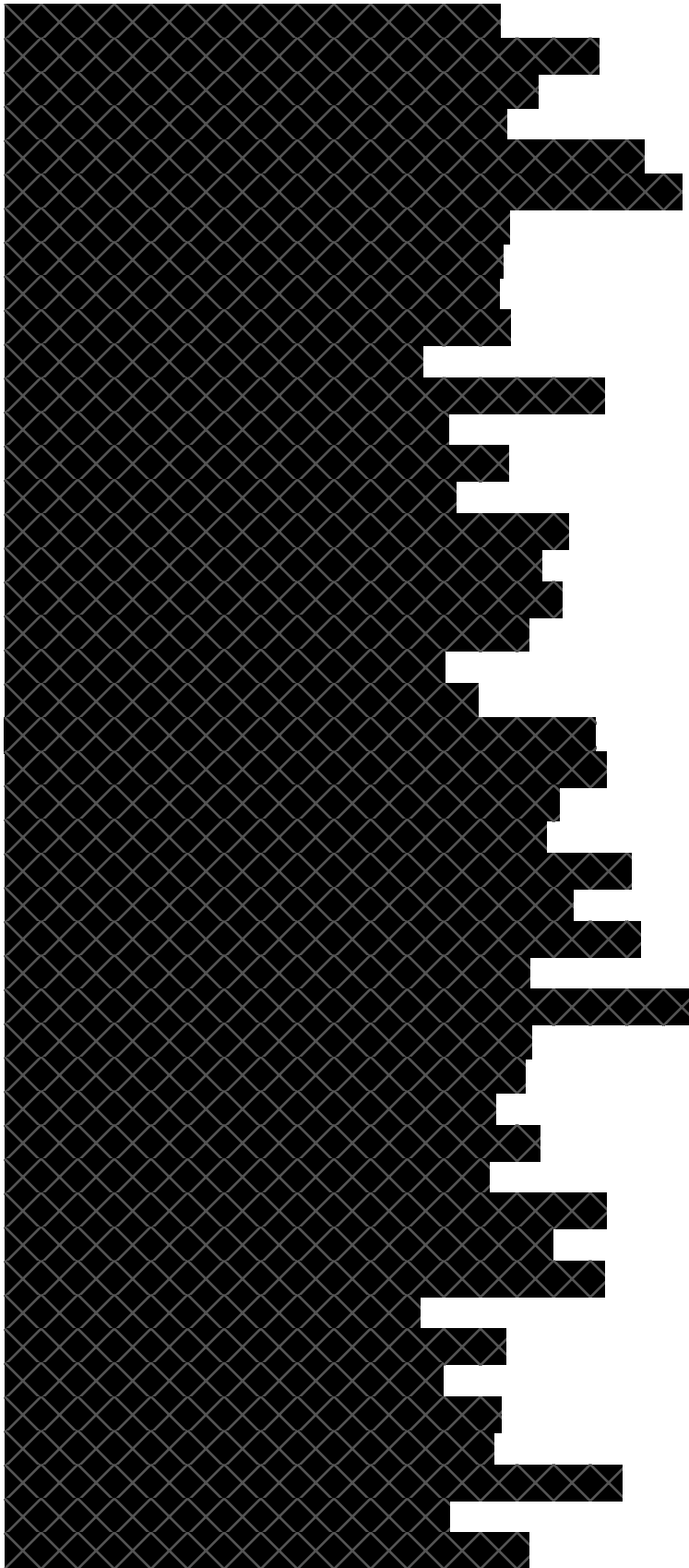
A TRUE INFORMATION

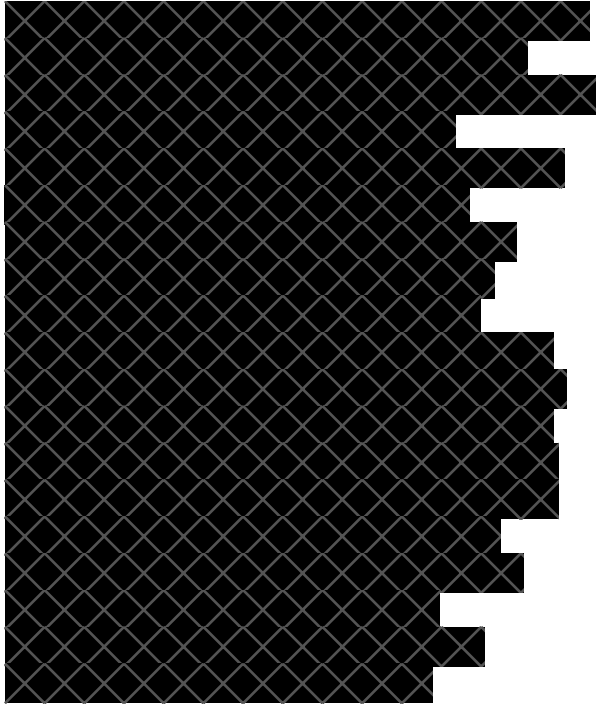
/s/ Kelly G. Cunningham
Kelly G. Cunningham
Scott County Attorney
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ENDORSEMENT OF WITNESSES:
FULL NAME / CITY, STATE











State of Iowa Courts

Type: Approval of Trial Information

Case Number	Case Title
FECR454407	STATE OF IOWA VS HOWARD JR, DANNY WILLIAM

On this date, I have reviewed the attached Trial Information and the accompanying Minutes of Testimony and find that they contain evidence which, if unexplained, is sufficient to warrant a conviction by a trial jury. Being satisfied from the showing made that the case should be prosecuted, I approve the Trial Information.

Release conditions are set by separate Order of the Court.

So Ordered

A handwritten signature in black ink, appearing to read "Henry W. Latham II", is written over a horizontal line.

Henry W. Latham II, District Court Judge,
Seventh Judicial District of Iowa