

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF RAMSEY

SECOND JUDICIAL DISTRICT

Minnesota Gun Owners Caucus,

Case Type: Civil Other/Misc.

Plaintiff,

The Honorable Leonardo Castro
Court File No. 62-CV-25-1083

vs.

Tim Walz, Governor of Minnesota, in his official capacity; Keith Ellison, Attorney General of Minnesota, in his official capacity, Mary Moriarty, Hennepin County Attorney, in her official capacity; Drew Evans, Superintendent of the Minnesota Bureau of Criminal Apprehension, in his official capacity,

Defendants.

**DECLARATION OF
ANNA VEIT-CARTER IN
OPPOSITION TO PLAINTIFF'S
MOTION FOR SUMMARY JUDGMENT**

I, Anna Veit-Carter, Assistant Attorney General, declare under penalty of perjury:

1. I am an attorney representing the Governor Tim Walz, Attorney General Keith Ellison, and Superintendent Evans (collectively "State Defendants") in the above-captioned civil action. I submit this Declaration in opposition to Plaintiff's Motion for summary Judgment.
2. Plaintiff filed and served its complaint in this matter on February 12, 2025. In response, State Defendants noticed a motion to dismiss.
3. Plaintiff filed and served a motion for summary judgment on April 15, 2025 without any prior notice that it was bringing such a motion to be heard the same day as State Defendants' motion to dismiss.
4. The Parties have not exchanged initial disclosures or conducted any discovery.

5. Plaintiff alleges that it has both direct and associational standing based on injury to its members. All facts supporting these allegations are in Plaintiff's possession, not the State Defendants'.

6. Specifically, for instance, Plaintiff has described three individuals it asserts own binary triggers. Plaintiff has not identified those individuals, and State Defendants have no way to verify their identities, that they own devices that would be banned by statute, that they reside in Minnesota, or that they are members or supporters of MGOC at this stage of the litigation and without conducting jurisdictional discovery.

7. State Defendants intend to conduct jurisdictional discovery through document requests, interrogatories, and depositions to test the veracity of Plaintiff's claims regarding direct organizational standing and associational standing on behalf of its members.

I DECLARE UNDER PENALTY OF PERJURY THAT EVERYTHING I HAVE STATED IN THIS DOCUMENT IS TRUE AND CORRECT.

Dated: April 29, 2025

County of Ramsey, State of Minnesota

/s/ Anna Veit-Carter

ANNA VEIT-CARTER

Assistant Attorney General