



Mayor Melvin Carter
St. Paul City Council
c/o Office of the City Clerk
310 City Hall
15 Kellogg Blvd W
St Paul, MN 55102

October 21, 2025

Re: Illegal Firearms Ordinance

Mayor Carter & Members of the Saint Paul City Council,

The Minnesota Gun Owners Caucus has been made aware of the City's intention to introduce a firearms-related ordinance on October 22, 2025. While we understand the ordinance may purport to delay its effective date indefinitely, such language does not cure its legal defect. This ordinance is **facially invalid** under state law and represents an unlawful assertion of municipal power.

Minnesota law could not be more clear. **Minn. Stat. § 471.633** states:

“The legislature hereby preempts all authority of local governments to regulate firearms, ammunition, or their respective components...”

This is an **express preemption** statute. It wholly and unambiguously prohibits cities from legislating in this domain. The Supreme Court of Minnesota and the Court of Appeals have both consistently affirmed that preempted ordinances are **void at inception**—regardless of when or whether they are enforced. See, for example, *In re Application of Hoffman*, 430 N.W.2d 210 (Minn. Ct. App. 1988), where a municipality's overreaching permit requirements were struck down under this same statute.

The City of Saint Paul lacks the authority to adopt any ordinance that regulates firearms or ammunition, whether directly or contingently. No legislative gimmick—such as an indefinite effective date—can circumvent a statutory bar.



The Minnesota courts have repeatedly held that municipalities **may not do indirectly what they are forbidden to do directly** (*Lilly v. City of Minneapolis*, 527 N.W.2d 107, 111 (Minn. App. 1995)). An ordinance that is invalid today does not become valid merely because its enforcement is deferred until an unspecified future date.

Should the City proceed with the passage of this ordinance, the Minnesota Gun Owners Caucus will **immediately initiate legal action** to challenge its validity in court. We will seek **declaratory and injunctive relief** on behalf of our members, supporters, and all peaceable gun owners residing in Saint Paul whose rights and legal clarity are placed in jeopardy by this unlawful measure. The ordinance's mere existence will cause constitutional and statutory harm, deter lawful conduct, and disrupt the rights and responsibilities of residents and businesses subject to its chilling effect.

Let us be clear: **if the city enacts this ordinance, we will sue.** This ordinance is facially invalid and immediately susceptible to legal challenge. No delay clause, aspirational language, or symbolic gesture alters the plain fact that the ordinance would be an illegal act, passed without authority, in open defiance of state law.

We urge the Council to abandon this unlawful course of action, respecting both the constitutional limits of municipal power and the rights of your residents.

Sincerely,

Rob Doar
General Counsel
Minnesota Gun Owners Caucus
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