

STATE OF MINNESOTA
COUNTY OF RAMSEY

DISTRICT COURT
SECOND JUDICIAL DISTRICT
Case Type: Civil/Other

Minnesota Gun Owners Caucus;

Court File No. _____

Plaintiff,

COMPLAINT

v.

**FOR DECLARATORY AND
INJUNCTIVE RELIEF**

City of Saint Paul, Minnesota

Defendant.

INTRODUCTION

1. This is a civil action for declaratory and injunctive relief to invalidate an ordinance passed by the City of Saint Paul (“the City”) that is a direct and flagrant violation of state law.

2. The Minnesota Legislature has expressly and completely preempted the entire field of firearms regulation, withdrawing “all authority” from municipalities to enact such laws. The state preemption statute, Minn. Stat. § 471.633, declares that any inconsistent local regulation is “void”.

3. Furthermore, the Legislature has separately and unequivocally preempted all local authority to regulate the carrying of firearms by law-abiding citizens who hold a state-issued permit to carry. Minn. Stat. § 624.714 establishes the "complete and exclusive" procedures for issuing permits and explicitly forbids any governmental unit

from "limit[ing] the exercise of a permit to carry".

4. Despite these clear and distinct prohibitions, the St. Paul City Council knowingly passed Ordinance 25-65¹ (the “Ordinance”), creating a new chapter of the city’s legislative code, Chapter 225A, that extensively regulates and bans the possession, transport, and sale of a wide range of common firearms, magazines, and accessories, and further purports to ban the carrying of firearms by permit-holders in numerous public places.

5. The City attempted to shield this illegal ordinance from judicial review by including a provision stating that it will only take effect upon the future repeal or amendment of the general preemption law, Minn. Stat. § 471.633.

6. This legal gimmick does not cure the Ordinance’s fundamental defects. An act that is void from its inception cannot be revived by a future contingency. Moreover, the Ordinance's restrictions on carrying firearms would remain illegal under Minn. Stat. § 624.714 even if the general preemption law were repealed. The City’s passage of the Ordinance was an *ultra vires* act—an exercise of power it does not possess—and the Ordinance is a legal nullity.

7. The Ordinance’s enactment and enforcement provisions are impermissibly vague. It declares itself effective thirty days after publication, yet simultaneously

¹ Exhibit A, City of Saint Paul, Minn., Ordinance 25-65, Creating Chapter 225A of the Legislative Code titled “Firearms Regulations to Establish Regulations for Assault Weapons, Binary Triggers, Ghost Guns, and Signage” (Nov. 5, 2025), available at <https://stpaul.legistar.com/LegislationDetail.aspx?ID=7704634&GUID=E547DB51-3073-4B0F-AA1B-BE5B30E6951E&FullText=1>

provides that it “shall not take effect, nor be enforced” until the repeal or amendment of state preemption laws—or upon the passage of any state law “substantially the same” as its own terms. The phrase “substantially the same” is undefined, and no mechanism exists for determining when such a triggering event has occurred, rendering the Ordinance void for vagueness under due process principles.

8. The mere existence of this void ordinance on the City’s books inflicts immediate and ongoing harm on the Minnesota Gun Owners Caucus’s members. It creates profound legal uncertainty, chills the present exercise of their fundamental right to keep and bear arms, and subjects them to a lawless assertion of municipal authority.

9. MNGOC brings this action to vindicate the rule of law, defend the Minnesota Legislature’s sole authority in this field, and protect the rights of its members by seeking a judicial declaration that the Ordinance is void *ab initio* and a permanent injunction against its publication, codification, and implementation.

THE PARTIES

10. Plaintiff Minnesota Gun Owners Caucus (“MNGOC”) is a Minnesota non-profit corporation with its principal place of business in Saint Paul, Minnesota. MNGOC is Minnesota’s largest gun rights advocacy organization, dedicated to protecting and advancing the right of law-abiding citizens to keep and bear arms. MNGOC brings this action on behalf of its members, many of whom reside, work, and travel within the City of Saint Paul.

11. MNGOC publicly invited its members and supporters residing or working in Saint Paul who lawfully own or carry firearms affected by the Ordinance to contact the organization regarding their concerns. Numerous members responded, describing how the Ordinance would alter or chill their lawful conduct.

12. The following members are representative of many more MNGOC members and supporters affected by the passage of the Ordinance.²

- a. Ashley Scharffbillig is a member of MNGOC and a resident of Saint Paul's Ward 6. They hold a valid Minnesota Permit to Carry a Pistol under Minn. Stat. § 624.714 and lawfully own firearms and accessories affected by the Ordinance. They have previously carried in public places in Saint Paul and would like to continue doing so but are uncertain whether their lawful conduct will now expose them to penalties. The Ordinance's vague and restrictive provisions now cause them to refrain from activities they would otherwise lawfully engage in, chilling their exercise of rights secured by state law and the Second Amendment.
- b. Mitchell Berg is a life member of MNGOC and a resident of Saint Paul's Ward 4. They hold a valid Minnesota Permit to Carry and lawfully owns multiple arms and accessories implicated by the Ordinance. Mr. Berg now refrains from carrying certain firearms and accessories as a result of the

² See Exhibit E - Affidavit of Bryan Strawser

Ordinance's vague and uncertain reach. They are particularly concerned that law enforcement officers may misunderstand or inconsistently apply the Ordinance, creating a risk of confrontation or enforcement against lawful conduct. Their uncertainty now deters them from exercising rights they would otherwise lawfully and confidently exercise under state law, causing a direct and ongoing injury to their statutory and constitutional rights.

- c. Bryan Strawser is the Chair of MNGOC and a resident of Roseville. They hold a valid Minnesota Permit to Carry and regularly travel into Saint Paul for work and recreation. Mr. Strawser has lawfully carried firearms in public places in St. Paul. With the passage of the Ordinance, they now refrain from carrying a privately manufactured firearm within the city due to concern that law enforcement officers may misunderstand or inconsistently enforce the Ordinance's vague provisions. This uncertainty has chilled their lawful exercise of rights.
- d. Brandon Flesher is a resident of Saint Paul's Ward 2 who holds a valid Minnesota Permit to Carry and has routinely carried firearms in public places within the city. They lawfully own multiple firearms and accessories implicated by the Ordinance. With the Ordinance's passage, they are reluctant to carry in public in Saint Paul out of concern that its vague and

uncertain provisions may be misapplied by law enforcement, creating a risk of confrontation or enforcement against otherwise lawful conduct. This chill on their conduct constitutes a concrete, ongoing injury to their statutory and constitutional rights.

13. Defendant City of Saint Paul, Minnesota, is a municipal corporation and a city of the first class organized and existing under the laws of the State of Minnesota. The City is a “home rule charter or statutory city” within the meaning of Minn. Stat. § 471.633.

JURISDICTION AND VENUE

14. This Court has subject matter jurisdiction over this action pursuant to Minn. Stat. § 555.01, *et seq.* (Uniform Declaratory Judgments Act) and its inherent equitable jurisdiction to grant injunctive relief.

15. This Court has personal jurisdiction over the Defendant because the City of Saint Paul is a municipal corporation organized and existing under the laws of the State of Minnesota, exercising governmental authority within the State, and the actions giving rise to this suit—including the passage of the challenged ordinance—occurred within the State and within this judicial district.

16. Venue is proper in Ramsey County pursuant to Minn. Stat. § 542.03 because the Defendant is situated in Ramsey County and the cause of action arose therein.

FACTUAL ALLEGATIONS

A. Minnesota Law Expressly Preempts All Local Firearm Regulation.

17. The Minnesota Legislature has unequivocally reserved for itself the sole authority to regulate firearms within the state.

18. Minnesota Statutes § 471.633, titled “Firearms,” states in full: The legislature preempts **all authority** of a home rule charter or statutory city including a city of the first class, county, town, municipal corporation, or other governmental subdivision, or any of their instrumentalities, to regulate firearms, ammunition, or their respective components to the complete exclusion of any order, ordinance or regulation by them except that: (a) a governmental subdivision may regulate the discharge of firearms; and (b) a governmental subdivision may adopt regulations identical to state law. **Local regulation inconsistent with this section is void.** (*emphasis added*).

19. This statute constitutes an express and total preemption of the field. It leaves no room for municipal regulation of firearms, ammunition, or their components, aside from the two narrow and irrelevant exceptions for discharge and regulations identical to state law.

20. By declaring any inconsistent local regulation “void,” the Legislature mandated that such ordinances are legal nullities from the moment of their passage or enactment, without legal force or effect.

B. Minnesota Law Separately and Expressly Preempts Local Regulation of Firearm

Carry.

21. In addition to the general preemption of all firearm regulation, the Legislature has specifically and exclusively occupied the field of regulating the carrying of firearms by law-abiding citizens.

22. The Minnesota Citizens' Personal Protection Act, codified at Minn. Stat. § 624.714, establishes the statewide criteria for the issuance of permits to carry a pistol. The statute makes clear that a permit issued under this section is a "state permit and is effective throughout the state".

23. To remove any doubt about the Legislature's exclusive authority in this area, Subdivision 23 of the statute explicitly preempts any local interference with this right: This section sets forth the **complete and exclusive criteria and procedures** for the issuance of permits to carry and establishes their nature and scope. **No** sheriff, police chief, **governmental unit**, government official, government employee, or other person or body acting under color of law or governmental authority may change, modify, or supplement these criteria or procedures, or **limit the exercise of a permit to carry**. (*emphasis added*).

24. A permit issued under § 624.714 also authorizes the carrying of rifles and shotguns in public places. Minn. Stat. § 624.7181 generally makes it a gross misdemeanor to carry a rifle or shotgun in a public place, but it provides a specific exception for "the carrying of a... rifle, or shotgun by a person who has a permit under

section 624.714".

25. Therefore, any local ordinance that attempts to prohibit a permit holder from carrying a firearm—whether a pistol, rifle, or shotgun—where state law allows it is an unlawful attempt to "limit the exercise of a permit to carry" and is in direct violation of Minn. Stat. § 624.714, Subd. 23.

C. The Saint Paul City Council Passes a Void Ordinance.

26. On or about October 22, 2025, the Saint Paul City Council introduced Ordinance 25-65, titled "Creating Chapter 225A of the Legislative Code titled Firearms Regulations to establish regulations for Assault weapons, Binary triggers, Ghost guns and Signage".

27. The Ordinance creates a new Chapter 225A of the Saint Paul Legislative Code which, among other things: a. Bans the possession, transport, storage, keep, or **carry** of firearms defined as "Assault weapon[s]" (Sec. 225A.07). b. Bans the possession, transport, storage, keep, or **carry** of ammunition feeding devices defined as "Large-capacity magazine[s]" (Sec. 225A.07). c. Bans the possession, transport, storage, keep, or **carry** of any "Binary trigger" (Sec. 225A.08). d. Bans the possession, transport, storage, keep, or **carry** of any firearm defined as a "Ghost gun" (Sec. 225A.09). e. Prohibits the possession, and therefore the **carry**, of any firearm in any "Sensitive place," defined broadly to include City-owned buildings, parks, recreation centers, and libraries (Sec. 225A.10).

28. These provisions directly purport to "limit the exercise of a permit to carry" for MNGOC's members who hold such permits, in violation of Minn. Stat. § 624.714, Subd. 23.

29. The City was fully aware that it lacked the authority to pass or enact such regulations. The Ordinance's own text acknowledges that "state preemption laws currently prohibit cities from enacting common-sense gun violence prevention ordinances".

30. Prior to the Ordinance's passage, MNGOC provided formal notice on October 22, 2025 to the City Council, warning that the proposed ordinance was facially invalid under Minn. Stat. § 471.633 and that its passage would result in immediate legal action.

31. On November 5th, 2025, MNGOC testified at a public hearing on the Ordinance again warning that the proposed ordinance was facially invalid under Minn. Stat. § 471.633 and that its passage would result in immediate legal action.

32. In an attempt to circumvent state law and insulate its *ultra vires* act from judicial review, the City included Section 225A.02, titled "Chapter Effective Upon Contingent Events," which states: Pursuant to Minnesota Statutes § 471.633 (state preemption of local Firearms regulation), this Chapter and its constituent Ordinances are contingent and shall not take effect, nor be enforced, unless and until the earliest of the following occurs: (a) The repeal of Minn. Stat. § 471.633; or (b) The passage of

any Minnesota law that is substantially the same as any part of this ordinance or otherwise affirmatively authorizes municipalities to enact and enforce substantially similar regulations.

33. This contingency clause only references the general preemption statute, § 471.633. It does not and cannot cure the Ordinance's separate and independent violation of the permit-to-carry preemption statute, § 624.714.

34. The St. Paul City Council proceeded to pass the Ordinance on November 12, 2025 despite its clear illegality.

D. The Ordinance Causes Immediate and Irreparable Harm.

35. MNGOC brings this action on behalf of its members who reside, work, and travel within the City of Saint Paul and are directly and presently harmed by the Ordinance's existence.

36. MNGOC has associational standing to bring this action because: (a) its members would have standing to sue in their own right; (b) the interests it seeks to protect—the right to keep and bear arms and the right to be governed according to state law—are germane to the organization's purpose; and (c) neither the claims asserted nor the relief requested requires the participation of individual members.

37. The passage, enactment or codification of the Ordinance, even with its contingent effective date, constitutes a present and ongoing injury-in-fact to MNGOC's members.

38. The Ordinance's existence creates a palpable chilling effect on the lawful exercise of fundamental rights under the Second Amendment to the U.S. Constitution and Article I, Section 13 of the Minnesota Constitution.

39. Law-abiding members of MNGOC in Saint Paul are now forced to make decisions about the acquisition, possession, and use of their property under a cloud of legal uncertainty. A member considering the lawful purchase of a firearm or magazine that is banned by the zombie Ordinance must now weigh the risk that their lawfully acquired property could be declared illegal contraband overnight by a future legislative vote at the State Capitol, while having no input on the implementation of the ordinance at the local level..

40. This uncertainty objectively deters and chills present, lawful conduct related to a fundamental constitutional right. It forces citizens to constantly monitor legislative activity under the threat of having their property criminalized automatically and without further local process.

41. The Ordinance further injures MNGOC's members by subjecting them to an *ultra vires* act of a municipal government. Members have a right to be governed in accordance with the statutory framework established by the state legislature. The City's passage of a law in a field from which its authority has been completely withdrawn is a present violation of that right and an injury to the rule of law itself.

42. The harm caused by the Ordinance is irreparable. The chilling of a

constitutional right and the injury of being subjected to a lawless government act cannot be compensated by monetary damages.

E. The Ordinance is Unconstitutionally Vague.

43. On November 12, 2025, the Saint Paul City Council passed the Ordinance, which specifies in Section 3 that it shall become effective thirty (30) days following its passage, approval, and publication.

44. Sec. 225A.02 of the Ordinance simultaneously declares that it “shall not take effect, nor be enforced,” unless and until the Minnesota Legislature repeals, amends, or judicially invalidates state preemption laws.

45. These two provisions directly conflict and create uncertainty as to when the Ordinance is legally effective.

46. Individuals lawfully engaging in protected conduct today cannot determine whether their conduct will become a criminal offense on the thirtieth day after publication or at some later date. The City’s assertion that the Ordinance will not be “enforced” until state law changes does not resolve the uncertainty created by its passage, enactment, and publication.

47. The Ordinance further states that it will automatically become effective upon the passage of “any Minnesota law that is **substantially the same** as any part of this ordinance **or** otherwise affirmatively authorizes municipalities to enact and enforce substantially similar regulations.”(emphasis added)

48. The Ordinance provides no definition of what qualifies as a “substantially the same” law and identifies no authority responsible for making that determination. It also establishes no procedure for deciding whether a state law meets that description or for notifying the public that the Ordinance’s criminal provisions have become enforceable.

49. This uncertainty invites arbitrary and inconsistent enforcement and fails to provide fair notice of what conduct is prohibited. The Ordinance’s conflicting effective dates and undefined contingencies render it void for vagueness under basic principles of due process.

F. A Pre-Enforcement Challenge Is Appropriate.

50. At the time of this filing, the Ordinance had been passed by the Saint Paul City Council and transmitted to the Mayor for approval.

51. The Ordinance cannot take effect until it is approved, signed, and published by the Mayor.

52. The Mayor has promoted and indicated his intent to approve, sign, and publish the Ordinance.³

53. The Ordinance, once published, would immediately begin its thirty-day countdown to enforceability while containing criminal penalties for ordinary lawful

³ Exhibit D - Press Release, *Mayor Carter and Minnesota Leaders Ready to Take Action on Gun Violence Prevention*, City of Saint Paul (Oct. 14, 2025), <https://www.stpaul.gov/news/mayor-carter-and-minnesota-leaders-ready-take-action-gun-violence-prevention> ion, See also *Ordinance to Prevent Gun Violence Introduced in St. Paul*, KSTP Eyewitness News (Oct. 23, 2025), <https://kstp.com/accountability/ordinance-to-prevent-gun-violence-introduced-in-st-paul/>

conduct.

54. The Ordinance's proposal, subsequent passage, and imminent approval have already chilled lawful conduct among MNGOC members who must now modify their behavior to avoid potential prosecution.

55. This ongoing chill and uncertainty constitute a present injury that warrants declaratory and injunctive relief preventing further steps toward the Ordinance's implementation.

CLAIMS FOR RELIEF

COUNT I

Declaratory Judgment, Injunction

Violation of General Firearm Preemption

(Minn. Stat. § 471.633)

56. Plaintiff re-alleges and incorporates by reference the allegations contained in the preceding paragraphs.

57. An actual, justiciable controversy exists between MNGOC and the City regarding the validity of Ordinance 25-65.

58. The City of Saint Paul is a "home rule charter or statutory city, including a city of the first class" and is therefore subject to the express preemption of Minn. Stat. § 471.633.

59. The Ordinance, which creates Chapter 225A of the Saint Paul Legislative

Code, is an “ordinance or regulation” that seeks to “regulate firearms, ammunition, or their respective components”.

60. The Ordinance is not a regulation of the “discharge of firearms” nor is it “identical to state law.”

61. The Ordinance is therefore a “Local regulation inconsistent with” Minn. Stat. § 471.633.

62. By statute, the Legislature ‘preempts all authority’ of municipalities to regulate firearms and components, with narrow exceptions not applicable here, and declares inconsistent local regulation ‘void.’ Minn. Stat. § 471.633.

63. Pursuant to the plain language of Minn. Stat. § 471.633, the Ordinance is “void.”

64. The contingent effective date provision in Section 225A.02 does not cure the Ordinance’s invalidity. An ordinance that is void upon enactment cannot be rendered valid by a future, uncertain event. The City’s action is an impermissible attempt to do indirectly what it is expressly prohibited from doing directly. The City may not accomplish indirectly—via contingent codification—what state law directly withdraws from its power.

65. MNGOC, on behalf of its members, is entitled to a judicial declaration that Ordinance 25-65 is *ultra vires*, void *ab initio*, and of no legal force or effect.

COUNT II

Declaratory Judgment, Injunction
Violation of Permit-to-Carry Preemption
(Minn. Stat. § 624.714)

66. Plaintiff re-alleges and incorporates by reference the allegations contained in the preceding paragraphs.

67. An actual, justiciable controversy exists between MNGOC and the City regarding the validity of the carry prohibitions contained in Ordinance 25-65.

68. Sections 225A.07, 225A.08, 225A.09, and 225A.10 of the Ordinance purport to prohibit Caucus members who hold a valid permit to carry from carrying firearms in places where state law otherwise permits them to do so.

69. These sections constitute an attempt by a "governmental unit" to "limit the exercise of a permit to carry," an action expressly and absolutely forbidden by Minn. Stat. § 624.714, Subd. 23.

70. These sections of the Ordinance are therefore void as a matter of law, independent of and in addition to the invalidity of the entire Ordinance under Minn. Stat. § 471.633.

71. The contingency clause in Section 225A.02, which is tied exclusively to the potential repeal of § 471.633, has no bearing on the illegality of these provisions under § 624.714. The carry prohibitions would remain void even if § 471.633 were repealed.

72. MNGOC, on behalf of its members, is entitled to a judicial declaration that

Sections 225A.07, 225A.08, 225A.09, and 225A.10 of Ordinance 25-65 are void and of no legal force or effect for violating Minn. Stat. § 624.714, Subd. 23.

COUNT III

Constitutional Right of Action

Violation of the Minnesota Constitution's Due Process Clause

(Minn. Const. art. I, § 7)

73. Plaintiff re-alleges and incorporates by reference the allegations contained in the preceding paragraphs.

74. The Minnesota Constitution guarantees that “[n]o person shall be held to answer for a criminal offense without due process of law, nor be deprived of life, liberty or property without due process of law.” Minn. Const. art. I, § 7.

75. Ordinance 25-65 imposes criminal penalties for possession, transport, or carrying of firearms, magazines, and accessories within the City of Saint Paul.

76. Article I, section 8 of the Minnesota Constitution, the “Remedies Clause,” further guarantees that: “Every person is entitled to a certain remedy in the laws for all injuries or wrongs which he may receive to his person, property or character, and to obtain justice freely and without purchase, completely and without denial, promptly and without delay, conformable to the laws.”

77. The Minnesota Supreme Court has recognized that the state constitution “provides a remedy for each right it guarantees.” *Cruz-Guzman v. State*, 916 N.W.2d 1,

9 (Minn. 2018).

78. The Ordinance provides that it shall “take effect and be in force thirty (30) days following its passage, approval, and publication.”

79. The Ordinance simultaneously states that it “shall not take effect, nor be enforced” unless and until state preemption laws are repealed, amended, or judicially invalidated.

80. The Ordinance also declares that it will automatically become effective upon the passage of “any Minnesota law that is substantially the same as any part of this ordinance or otherwise affirmatively authorizes municipalities to enact and enforce substantially similar regulations.”

81. The Ordinance does not define what constitutes a law that is “substantially the same”, identify who decides when such a law exists, or describe the process for determining when its own criminal prohibitions would become enforceable.

82. These conflicting and undefined provisions prevent ordinary citizens from knowing when lawful conduct will become criminal and invite arbitrary and discriminatory enforcement.

83. The vagueness of the Ordinance deprives citizens of fair notice, fails to provide clear standards for enforcement, and violates the due-process guarantees of the Minnesota Constitution.

84. When legislative action exceeds constitutional limits, “it is the duty of the

judiciary to so declare.” *Id.* at 10 (quoting *Rippe v. Becker*, 57 N.W. 331, 336 (Minn. 1894)).

85. Plaintiff and its members are presently injured by the uncertainty created by the Ordinance and are entitled to a judicial declaration that it is void for vagueness.

86. Plaintiff therefore seeks a declaratory judgment that Ordinance 25-65 is unconstitutional on its face and as applied because it violates due-process principles of clarity and fair notice.

87. The vagueness of the Ordinance violates Article I, Section 7 of the Minnesota Constitution. Declaratory relief is authorized under Minn. Stat. §§ 555.01 *et seq.*

COUNT IV

Injunctive Relief

88. Plaintiff re-alleges and incorporates by reference the allegations contained in the preceding paragraphs.

89. MNGOC’s members will suffer immediate and irreparable harm, as described above, if the City is not enjoined from treating the Ordinance as a valid, albeit dormant, law. The ongoing chilling effect on constitutional rights and the legal uncertainty created by the City’s *ultra vires* act constitute irreparable injury.

90. MNGOC has no adequate remedy at law.

91. The balance of harms weighs decisively in favor of granting an injunction.

MNGOC and its members suffer significant and ongoing constitutional and statutory harm from the Ordinance's existence. The City suffers no cognizable harm from being enjoined from implementing a void ordinance that it has no legal authority to enforce.

92. The public interest is served by granting an injunction to uphold the supremacy of state law, maintain uniformity in firearms regulation as intended by the Legislature, and prevent municipalities from exceeding their lawful authority.

93. MNGOC is entitled to a permanent injunction prohibiting the City, its officers, agents, servants, employees, and all persons in active concert or participation with them, from publishing, codifying, implementing, or enforcing the Ordinance in any manner.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff Minnesota Gun Owners Caucus respectfully requests that this Court enter a judgment in its favor and against Defendant City of Saint Paul, granting the following relief:

- A. A declaratory judgment that Saint Paul Ordinance 25-65, creating Chapter 225A of the Saint Paul Legislative Code, is inconsistent with Minn. Stat. § 471.633, *ultra vires*, and void *ab initio*;
- B. A declaratory judgment that Sections 225A.07, 225A.08, 225A.09, and 225A.10 of Ordinance 25-65 are void for violating the express preemption on limiting the exercise of a permit to carry contained in Minn. Stat. § 624.714, Subd. 23;

- C. A declaratory judgment that Ordinance 25-65 is void for vagueness and unconstitutional under Article I, Section 7 of the Minnesota Constitution because it fails to provide fair notice of prohibited conduct and invites arbitrary enforcement;
- D. A permanent injunction prohibiting the City of Saint Paul, its officers, agents, employees, and attorneys, and all those acting in concert with them, from publishing, codifying, implementing, or enforcing Ordinance 25-65;
- E. Nominal damages for violation of Plaintiff's constitutional rights, and the rights of its members and supporters, under the Declaratory Judgments Act or Remedies Clause in the amount of \$1.00;
- F. An award of costs, upon proper application for the same, as may seem equitable and just under Minn. Stat. § 555.10;
- G. An award of Plaintiff's reasonable attorneys' fees under the Minnesota Equal Access to Justice Act, Minn. Stat. § 15.471, *et.seq.*, upon proper application for the same; and
- H. Such other and further relief as the Court deems just and proper.

Dated: November 12, 2025

Respectfully submitted,

/s/ Rob Doar

Rob Doar (#506356)

716 County Road 10 NE, Suite 116

763-762-3529

rob@robdoarlaw.com

Attorney for Plaintiff