

STATE OF MINNESOTA
COUNTY OF RAMSEY

DISTRICT COURT
SECOND JUDICIAL DISTRICT
Case Type: Civil/Other

Minnesota Gun Owners Caucus;
Plaintiff,

Court File No. _____

v.

City of Saint Paul, Minnesota
Defendant.

**AFFIDAVIT OF ASHLEY
SCHARFFBILLIG IN SUPPORT OF
PLAINTIFFS' MOTION FOR EX
PARTE TEMPORARY
RESTRAINING ORDER AND
TEMPORARY INJUNCTION**

I, Ashley G. Scharffbillig, declare under penalty of perjury under the laws of the State of Minnesota that the foregoing is true and correct:

1. I am over the age of 18 and competent to give this affidavit. The facts stated here are based on my personal knowledge.
2. I am a current resident of the City of Saint Paul, Minnesota, in Ward 6. For safety and privacy reasons, I do not include my full street address in this public filing, but I am willing to provide my full address to the Court in camera if requested.
3. I am a member of the Minnesota Gun Owners Caucus, and my membership is current. I joined because I care about protecting the rights of ordinary, law-abiding gun owners in Minnesota.
4. I hold a valid Minnesota Permit to Carry a Pistol issued under Minn. Stat. § 624.714, and I have held a valid permit continuously for several years.

5. In my day-to-day life, I spend a significant amount of time in Saint Paul. I live in the City, travel through it for errands, work, and social activities, and regularly visit public places, including city parks, libraries, and other city-owned property.

6. In the ordinary course of my life before the passage of Saint Paul Ordinance 25-65, I lawfully carried a handgun for self-defense in public in Saint Paul. I have previously carried in Saint Paul parks, libraries, and other city-owned buildings where it is lawful to do so under Minnesota law.

7. I intend to continue carrying a defensive firearm in public in Saint Paul, including in parks, libraries, and other city-owned locations where carrying is lawful under state law. I also intend to continue traveling throughout the City with my firearms and ammunition as part of my normal routine.

8. I lawfully own firearms and accessories that are affected by, or reasonably appear to be affected by, Saint Paul Ordinance 25-65. This includes at least one semiautomatic rifle that would likely be classified as a “semiautomatic military-style assault weapon” under Minn. Stat. § 624.712, subd. 7, and multiple detachable magazines with capacities greater than 20 rounds. These items are commonly owned, lawful under Minnesota and federal law, and are used for lawful purposes such as self-defense, training, and sporting use.

9. I do not own or possess any privately manufactured firearms without serial numbers, what the City of Saint Paul calls “ghost guns,” and I have never possessed

such firearms.

10. I lawfully possessed and used my firearms and magazines before the City Council passed Ordinance 25-65, and I would like to continue to possess and use them in the future in accordance with Minnesota and federal law, including in Saint Paul.

11. I have reviewed Saint Paul Ordinance 25-65 and public descriptions of it by the City. The Ordinance appears to criminalize possession of certain firearms, “large capacity magazines,” and “ghost guns” in Saint Paul, including on city property, and to impose criminal penalties on violations.

12. I have also read Section 3 of the Ordinance, which states that it takes effect “thirty (30) days after its passage, approval, and publication,” but also states that it “shall not take effect” unless the state firearm preemption statute is repealed or a “substantially similar” law is enacted at the state level.

13. The way Section 3 is written is confusing to me. I do not understand when the City believes the Ordinance will actually be enforceable, how the 30-day period interacts with the state preemption law, or who decides whether a future state law is “substantially the same” enough to trigger enforcement.

14. I am concerned that Saint Paul police officers or prosecutors might adopt different interpretations of the Ordinance or misunderstand it, including by taking the position that it can be enforced as soon as it is signed and published, or later taking

the position that some new state law is “substantially similar” and beginning enforcement against people like me.

15. Because of this uncertainty and the threat of criminal penalties, I have already changed how I behave. For example:

- a. I am now hesitant to carry my usual defensive firearm with its standard magazines in certain parts of Saint Paul, even though carrying is lawful for me under state law and I have done so safely for years.
- b. I am reconsidering whether to carry in city parks, libraries, and other city-owned properties in Saint Paul, even where I would be legally allowed to carry under state law, because I am worried that the Ordinance could be applied against me.
- c. I am more cautious about when and how I travel through the City with my firearms and magazines, and I am evaluating whether to avoid certain trips or locations to reduce the chance of a misunderstanding or enforcement action based on the Ordinance.

16. These are activities I would otherwise lawfully and confidently engage in under Minnesota law. I am changing or holding back on them now because of the Ordinance and the risk that it will be enforced against me, not because I want to change my ordinary, lawful conduct.

17. If the Ordinance is allowed to be enacted, implemented, and enforced, I will

be forced to choose between exercising my rights as I have lawfully done in the past—by carrying my defensive firearm and using standard magazines in Saint Paul—and risking arrest, prosecution, and the loss of my firearms, or giving up that exercise of my rights to avoid criminal exposure.

18. Because this ordinance is unclear about when the criminal penalties begin, I am evaluating whether it is feasible for me to relocate my residence outside the City of Saint Paul. I am also concerned that I may be required to sell firearms that I legally possess, or transfer them to a third party in a manner that limits my access and control, simply to continue living in Saint Paul. This uncertainty has created a significant burden on my housing and property decisions.

19. The possibility of being arrested or prosecuted, of having a criminal record, or of losing my firearms and magazines is extremely serious to me. Those harms cannot be undone by money damages. The chill on my ability to lawfully possess and carry my firearms and magazines for self-defense and other lawful purposes also cannot be adequately compensated with money.

20. I understand that the Minnesota Gun Owners Caucus has brought this lawsuit to challenge the legality of the Ordinance and to ask the Court to prevent the City from enacting, implementing, or enforcing it. I support that effort and submit this affidavit to explain how the Ordinance affects and harms me personally.

FURTHER YOUR AFFIANT SAYETH NAUGHT.

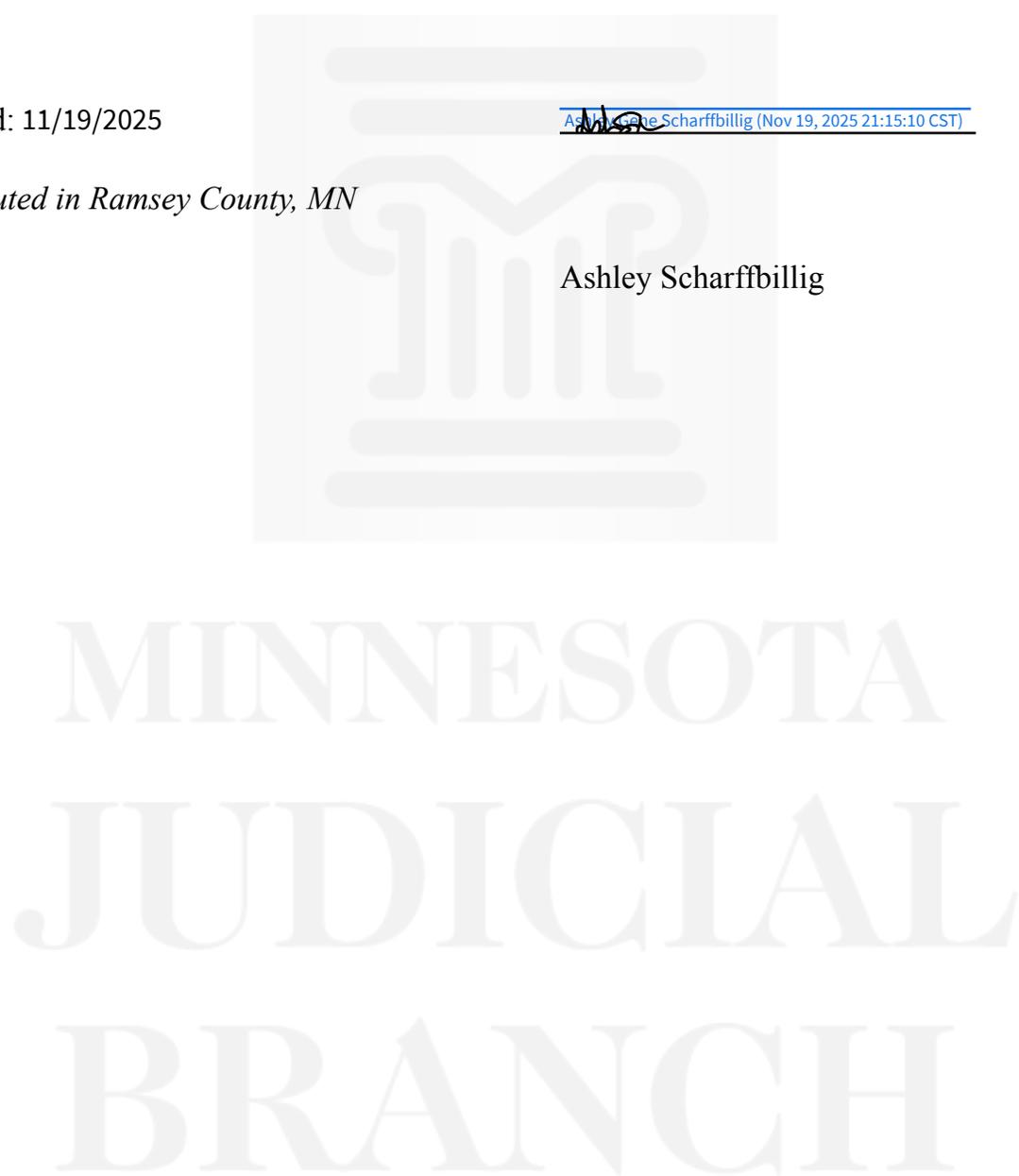
I declare under penalty of perjury that everything I have stated in this document is true and correct.

Dated: 11/19/2025


Ashley Scharffbillig (Nov 19, 2025 21:15:10 CST)

Executed in Ramsey County, MN

Ashley Scharffbillig



MINNESOTA
JUDICIAL
BRANCH