

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF RAMSEY

SECOND JUDICIAL DISTRICT
CASE TYPE: OTHER CIVIL

Reverend Tim Christopher,
Sarah Cade Hauptman, and the
Minnesota Gun Owner Caucus,

Court File No.: 62-CV-21-4223

Plaintiffs,

v.

**AFFIDAVIT OF
CHIEF DEPUTY DAVID METUSALEM**

Ramsey County, Bob Fletcher,
in his official capacity as
Ramsey County Sheriff, and the
State Agricultural Society,

Defendants.

STATE OF MINNESOTA)
)ss
COUNTY OF RAMSEY)

David Metusalem, first being duly sworn on oath, states as follows:

1. I have been a licensed peace officer in the state of Minnesota for 31 years. I make this Affidavit upon personal knowledge.

2. I currently serve as the Chief Deputy for the Ramsey County Sheriff's Office (RCSO). The first part of my career at the RCSO spanned from 1988 through March 2017. During that time, I rose in the ranks from deputy, sergeant, director of policy and planning, undersheriff, and then ultimately holding the position of chief deputy.

3. In March 2017, I left the RCSO to accept a position as the Executive Director of the Minnesota Police and Peace Officers Association (MPPOA). In January 2019, I returned to the RCSO to again serve as its chief deputy.

4. In the role of chief deputy, I oversee all aspects of department operations, including the

RCSO's response to civil unrest.

5. Over the past two years, I have witnessed a disturbing trend emerge. Many groups, including persons who are racially motivated, violent extremists believe that the Minnesota Open Carry Law does not require permit holders to conceal their firearms and does not prohibit the open carry of long guns such as assault rifles. In fact, the Minnesota Gun Owners Caucus's website espouses this view of the law. See https://www.gunowners.mn/long_guns_carrying. The prevalence of this interpretation has resulted in groups at protests, including counter protesters, carrying their weapons visibly, including assault rifles.

6. Were this to occur at the Minnesota State Fair, based on my experience, it would at the very least cause trauma and fear in fairgoers, particularly in families and children. Even more concerning is that many citizens are not familiar with these aspects of the state's open carry law and may believe that an active shooter is on the grounds. This could result in a panicked response in which thousands of people stampede to get off the fairgrounds. Due to the volume of fairgoers on any given day, a stampede response could easily result in many injuries, including the possibility of fatalities.

7. Based on my 31 years of experience in law enforcement, I strongly believe that the Minnesota Agricultural Society's policy banning firearms from the Minnesota State Fair is in the best interests of keeping everyone as safe as possible at the fair.

FURTHER AFFIANT SAYETH NOT,

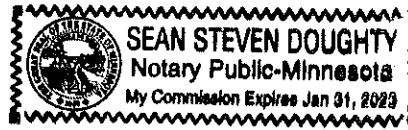
Dated: August 17, 2021


Chief Deputy David Metusalem

Subscribed and sworn to before me on

17th day of August, 2021


NOTARY PUBLIC



Dated: August 17, 2021


Chief Deputy David Metusalem