

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
COMMANDER RON KNAFLA**

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)

COMMANDER RON KNAFLA, first being duly sworn on oath, states as follows:

1. I am a licensed peace officer and a Commander with the Ramsey County Sheriff's Office (RCSO). I make this Affidavit upon personal knowledge.
2. I have served as a peace officer with the RCSO for 33 years.
3. I have also served as a Minnesota State Fair police officer for 33 years.
4. In May 2021, the Minnesota Agricultural Society (the "Society") disbanded its police department (aka Minnesota State Fair Police Department), instead wishing to contract with the RCSO for the provision of law enforcement services on the Minnesota State Fairgrounds.
5. In July 2021, Ramsey County and the Society entered into a Joint Powers Agreement to memorialize and set forth the terms of the agreement to provide police services. That agreement provided for a gate security plan in which the Fair would hire a private security company to use

magnetometers and check bags for weapons at the gates.

6. Sheriff Bob Fletcher assigned me to manage the law enforcement services for the Minnesota State Fair. As such, I assumed all duties and responsibilities that were previously performed by the Minnesota State Fair Police Chief.

7. Over the last 33 years, except 1999 and 2008, I worked for the Minnesota State Fair Police Department for the entire 12 days of the fair.

8. During my 33 years working as a police officer at the fair, over 50 million people have attended, and I have neither experienced nor been made aware of a situation where an attendee needed a firearm to protect themselves inside the fairgrounds. In fact, with over 200,000 attendees on some days, and a record crowd in 2018 of over 270,000, the crowds are so dense that any discharge of a firearm has a high likelihood of striking one or more innocent bystanders.

9. The RCSO's operations and safety plan for the 2021 fair was designed with the gate security plan and firearms ban in mind. To force the RCSO to rework this operations and safety plan just days before the fair opens is untenable.

10. I believe that the Minnesota Agricultural Society's longstanding policy of banning firearms on the fairgrounds is imperative to public safety in that environment.

FURTHER AFFIANT SAYETH NOT,

Dated: August 18, 2021

/s/ Ron Knafla

Commander Ron Knafla

Subscribed and sworn to before me on August 18, 2021.

Andrea Frances Jamison

Notary Public, Commission # 1056041500034

State of Minnesota

My Commission Expires January 31, 2023

/s/ Andrea Jamison

NOTARY PUBLIC

I witness, attest and verify the electronic signature on this document.