

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
UNDERSHERIFF MIKE MARTIN**

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)

Mike Martin, first being duly sworn on oath, states as follows:

1. I have been a licensed peace officer in the State of Minnesota for 29 years. I make this affidavit upon personal knowledge.

2. I retired from the Minneapolis Police Department after working as a street officer, Gang Unit Investigator, Gang Unit Sergeant, Precinct Lieutenant, Captain of Investigations, and Precinct Commander. I am now the Undersheriff of Regional Services for the Ramsey County Sheriff's Office, overseeing the Violent Crime Enforcement Team, Intelligence, Special Investigations, Central Investigations, SWAT, and the Mobile Field Force.

3. I am also the National Vice President and Minnesota Chapter President of the Midwest Gang Investigators Association. Our organization represents 220 gang investigators in Minnesota and 1200 members across 10 Midwest states. I have testified as a gang expert witness in numerous

criminal and civil trials and have provided expert affidavits in many others. In addition, I am an instructor and develop curriculum for the National Gang Center.

4. I am a gun owner and a staunch supporter of the Second Amendment to the United States Constitution. I believe, however, that allowing gun owners with permits to carry firearms into the Minnesota State Fair will create an unnecessary risk to the public.

5. While the Ramsey County Sheriff's deputies and police officers working the fair have completed rigorous firearms training, most permit holders have very limited training and experience. This training does not require the types of scenarios that occur in a densely crowded environment like the State Fair. Even licensed peace officers must complete specialized training to fly armed on a commercial aircraft. This is because firing a gun on a plane presents a host of unique concerns that don't exist in other environments. Similarly, I believe the State Fair presents unique situations that severely limit when use of a firearm would be appropriate.

6. As an experienced investigator, I am also aware that individuals prohibited from possessing or carrying firearms often rely on associates to carry guns for them (girlfriends, boyfriends, etc.). This allows them to bypass security precautions and still have access to guns. This is especially true with gang members who may encounter rivals. Allowing guns into the fair will unnecessarily create a situation where a fistfight could easily escalate to a shooting.

7. My final concern is the recent trend of individuals with permits open-carrying long rifles for political reasons or based on racially motivated, violent extremist beliefs. We have seen this dozens of times at recent protest marches, on the State Capitol grounds, outside of the Governor's Residence, and during rioting. If we allow permit holders to carry on the State Fairgrounds, then we risk individuals carrying slung semi-automatic rifles and terrifying other fairgoers.

8. Because of these serious public safety concerns, I strongly support the State Fair's policy of prohibiting firearms.

FURTHER AFFIANT SAYETH NOT,

Dated: *AUGUST 18, 2021*

Mike Martin
Undersheriff Mike Martin

Subscribed and sworn to before me on XXX

Todd Levig
NOTARY PUBLIC

