

STATE OF MINNESOTA**DISTRICT COURT****COUNTY OF RAMSEY****SECOND JUDICIAL DISTRICT**

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

Case Type: Other Civil
Court File No.: 62-CV-21-4223
Judge: Hon. Laura Nelson

Plaintiffs,

v.

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

Defendants.

**DECLARATION OF RENEE
ALEXANDER IN OPPOSITION TO
PLAINTIFFS' MOTION FOR
TEMPORARY INJUNCTION**

I, Renee Alexander, declare under penalty of perjury as follows:

1. I am the Deputy General Manager for the Minnesota State Fair, and have been in this role for fourteen years. In that role, I oversee the marketing, entertainment, ticketing, educational programming, graphic design, web, and guest services departments. In total, I have been an employee of the Fair for twenty-one years.

2. I am responsible for the overall branding and promotion of the Great Minnesota Get-Together and, as part of the senior management team, I develop vision, strategies, and resources for a world class exposition that preserves tradition while presenting a guest experience that is innovative, entertaining, and fun.

3. One of my primary responsibilities is booking and producing entertainment for the 13,000-seat historic Grandstand, which in previous years, draws more than 100,000 concert-goers and more than \$6 million in revenue in just 12 days.

4. The presence of weapons on the fairgrounds would put the entire entertainment program in serious jeopardy. Standard practice throughout the entertainment industry is to prohibit weapons in entertainment venues.

5. The Fair contracts with each of the artists who perform at the Fair, often through their agent or management company.

6. It is standard practice for the contract to state that the Fair must provide a safe environment for the performers.

7. Concerns about gun violence at entertainment events have been increasing in the entertainment industry.

8. Many artists demand that weapons be banned from the venues in which they perform. Some artists even require a specific contractual provision banning guns from their shows. For example, for the 2021 Fair, one world-renowned artist's proposed contract specifically requires that the Fair ensure no handguns are allowed on the Fairgrounds:

[The Fair] will ensure that handguns and weapons of any kind are prohibited from being brought into the venue by any persons other than law enforcement officials or authorized venue personnel (including from commencement of load in and continuing until load out is completed following Artist's performance). Company/Artist shall have the right to refuse to perform in the event any handguns or weapons of any kind are brought into the venue (exclusive of law enforcement officials or other venue personnel) and/or the further right to request immediate removal of non-compliant individuals from such venue.

9. Artists may attempt to cancel their performances if the Fair does not provide a safe environment.

10. Talent agents have shared with me that allowing guns at the Fair would be a major concern for the artists they represent.

11. If guns are allowed at the Fair, artists that I have booked for the 2021 Fair may argue that they have a right to cancel their shows.

12. Cancellation of performances would cause substantial financial hardship to the Fair.


13. While it is impossible to say with certainty what the full extent of the financial harm to the Fair would be if all of the artists canceled their performances this year, at a minimum the Fair would lose \$3,443,680 in direct revenue for refunded Grandstand tickets. Ticket sales will increase as the Fair approaches, and direct lost revenue could reach \$6,755,139 if all of the shows are sold out by Fair time.

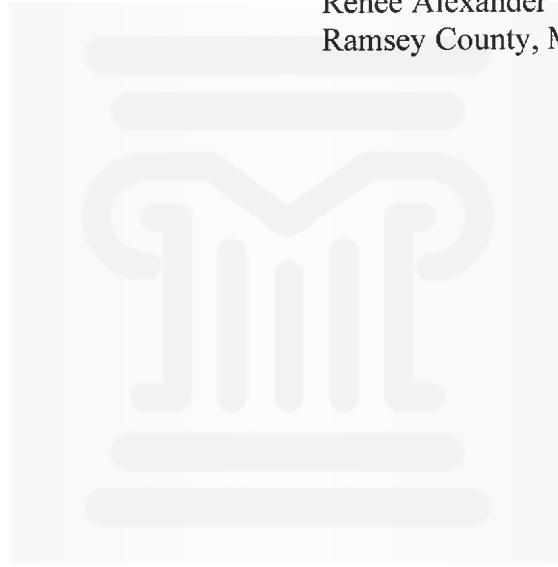
14. In addition to refunded Grandstand tickets, the Fair would likely lose revenue from refunded gate admission tickets, decreased food and beverage purchases, and lost sponsorships. Those damages could range from \$2 million to more than \$3.5 million in gross revenue.

15. Comments from the public on the Fair's social media account (@mnstatefair) have been overwhelmingly negative about guns at the Fair. We have received emails from potential fairgoers expressing great concern about guns being allowed at the Fair. Many people have said, in comments to the Fair and in public comments on social or other media, that they will not attend the Fair if guns are allowed. While it cannot be quantified with certainty, I estimate that State Fair attendance will decrease by at least 20% if guns are allowed at the Fair because fairgoers will be concerned for their safety. A proportional reduction in State Fair revenue would be approximately \$12 million.

Pursuant to the laws of the United States, I declare under penalty of perjury that the foregoing is true and correct.

Dated: August 18, 2021


Renee Alexander
Ramsey County, Minnesota



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