

**State of Minnesota  
County of Ramsey**

**District Court  
Second Judicial District**

Troy Kenneth Scheffler,

Plaintiff,

Court File Number:

Case Type: Civil-Personal Injury

vs.

**COMPLAINT**

(Jury Trial Demanded)

Ramsey County, *a political subdivision  
of the State of Minnesota,*

Bob B. Fletcher, *in his official capacity  
as Ramsey County Sheriff and MGDPA  
Responsible Authority,*

and

Tim Gulden, *in his official capacity as  
Ramsey County Sheriff's Office MGDPA  
Designee,*

Defendants.

COMES NOW THE PLAINTIFF AND STATES HIS CAUSE OF ACTION AS  
FOLLOWS:

**INTRODUCTION**

Plaintiff Troy Scheffler sues Defendants for violation under the Minnesota Data  
Practices Act.

**SUBJECT MATTER JURISDICTION**

1. This court has subject matter jurisdiction as a court of general jurisdiction in  
accordance with Minn. Stat. § 484.01.

**VENUE**

2. Plaintiff lays venue in the district court, Second Judicial District, Ramsey County,  
Minnesota, in accordance with Minn. Stat. § 542.09.

**PARTIES**

3. Plaintiff Troy Kenneth Scheffler is an adult man, born on 02/05/1976, domiciled at 26359 Shandy Trl, Merrifield, MN 56465.

4. Defendant Ramsey County is a political subdivision located Minnesota with Ramsey County Board administrative offices located at 15 W. Kellogg Blvd, Room 220, St. Paul, MN 55102.

5. Defendant Bob Fletcher (Fletcher) is an adult male employed by County of Ramsey as Sheriff and was acting in his official capacity with regard to claims contained and acting Responsible Official for Chapter 13 Minnesota Data Practices requests, whose office address is located at 425 Grove St., St. Paul, MN 55101.

6. Defendant Tim Gulden (Gulden) is an adult male and was employed by County of Ramsey as Sheriff's Office as Commander and was acting in his official capacity with regard to claims contained and acting Responsible Official Designee and Compliance Official for Chapter 13 Minnesota Data Practices requests, whose office address is located at 425 Grove St., St. Paul, MN 55101.

### FACTS

7. That on 09/07/2021, Plaintiff did email a Minnesota Chapter 13 Data Request to Fletcher and Gulden at bob.fletcher@co.ramsey.mn.us and tim.gulden@co.ramsey.mn.us, respectively.

8. Said request asked for the following data: The number of acts of violence at the Minnesota State Fair for that current year, disclosure of the racial demographics of the suspects, disclosure of any and all reports and 911 calls concerning the mob attack at the Fair on 09/07/2021, disclosure of any policies and training with regard to black violence occurring in Ramsey County, the State Fair, and the State at large, and the existential threat

it poses against White people and any effort by the Sheriff to inform the public of the danger, disclosure of the unwritten and written policies of downgrading crime, “sandbagging” (i.e. carrying over homicide investigations to the next year and then reclassifying them as murder), and avoiding writing reports and arrests altogether to artificially lower black crime rates in Ramsey County.

9. That Plaintiff further noticed Defendants, “Oh and don't forget the "diversity" shootings and mob attacks on White people at the close of the last fair... Oh and then the BLM storming of the Fair the year before... Etc etc etc etc. 6% of the population and well over half the murder, the vast majority of robbery, home invasions, etc.”

10. That the requested data is Public Data with regard to the Minnesota Data Practices Act.

11. That later on 09/07/2021, Gulden responded to Plaintiff’s email at troyscheffler@gmail.com, stating, “I have forwarded your request to Commander Robbins who handles data practices.”

12. Gulden’s email was also cc’d to Commander Robbins at roy.robbins@co.ramsey.mn.us.

13. That on 09/07/2021, Defendants’ Data Practices Policy stated that Defendant Fletcher was the Data Practices Responsible Official and that Defendant Gulden was the Designee.

<https://www.ramseycounty.us/sites/default/files/Sheriff/Data%20Practices%20Policy-Data%20About%20You.pdf>

14. That Defendants’ current Data Practices Policy states that “Brooke Oachs” is the Designee for the Sheriff’s Office, but fails to disclose the Responsible Authority as required

under MN Stat. 13.025, subd. 2.

15. That Defendants' failed to make publicly available a policy concerning the rights of data subjects under MN Stat. 13.025, subd. 3.

16. That Defendants failed to disclose the data requested nor respond in a reasonable time or at all.

17. That Defendants' willfully violated Plaintiff's right to access the requested public data.

18. That under information and belief, Defendants' inaction was based on racial bias against Plaintiff and in general, White people.

19. That Defendants have traditionally and continue to exercise differential treatment against Whites and preferential treatment towards non-Whites at all levels including employment and services.

20. That the Defendants have and continued to exercise an intentional lack of transparency concerning demographics and crime based upon racial bias against Whites.

21. That this lack of transparency presents a major and dire public safety issue to Whites, including Plaintiff.

22. That Defendants' unlawful acts are particularly egregious considering that Plaintiff's data request asked about the Defendants' practices of hiding black crime data.

23. That the Defendants did cause Plaintiff significant and severe emotional distress from their actions.

24. That Defendants willfully are noncompliant with the Minnesota Data Practices Act by refusing to release the data requested by Plaintiff.

25. That Plaintiff suffered and seeks damages under MN Stat. 13.08.

**CLAIM I****Minnesota Data Practices Act – MN Stat. 13.03**

26. Plaintiff reincorporates and realleges the aforementioned facts.
27. That on 09/07/2021, Plaintiff did request data from Defendants.
28. That the data requested is not protected or privileged data.
29. That the data was not timely disclosed and was in fact not disclosed at all to date without cause.
30. That Defendants' noncompliance was willful.
31. That the denial of data was based upon racial bias against Plaintiff.
32. That Plaintiff seeks damages from all Defendants under MN Stat. 13.08.
33. That Plaintiff suffered actual damages including emotional distress, anxiety, and insomnia.
34. That Plaintiff seeks exemplary damages in the amount of \$15,000.
35. That Plaintiff seeks damages in excess of \$50,000.
36. That Plaintiff seeks mandamus relief to compel compliance with Plaintiff's 09/07/2021 request for data.

**CLAIM II****Minnesota Data Practices Act – MN Stat. 13.025**

37. Plaintiff reincorporates and realleges the aforementioned facts.
38. That Defendants' current Data Practices Policy states that "Brooke Oachs" is the Designee for the Sheriff's Office, but fails to disclose the Responsible Authority as required under MN Stat. 13.025, subd. 2.
39. That Plaintiff seeks damages from Defendants under MN Stat. 13.08.

40. That Plaintiff seeks exemplary damages in the amount of \$1000.

### **CLAIM III**

#### **Minnesota Data Practices Act – MN Stat. 13.025**

41. Plaintiff reincorporates and realleges the aforementioned facts.

42. That Defendants failed to make publicly available, current to the signing of this Complaint, a policy concerning the rights of data subjects under MN Stat. 13.025, subd. 3.

43. That Plaintiff seeks exemplary damages in the amount of \$1000.

**WHEREFORE**, Plaintiff Troy Scheffler prays for the following relief against the Defendants:

A. Judgment in the favor of Plaintiff against Defendants jointly and severally;

B. Actual/Compensatory damages;

C. Exemplary damages;

D. [Placeholder for amendment]

E. Injunctive Relief;

F. Mandamus Relief;

G. Costs and disbursements in accordance with law;

H. Statutory and Prejudgment interest in accordance with law;

I. Reasonable Attorney Fees; and

J. Such other legal or equitable relief as this court is pleased to grant.

### **VERIFICATION**

Having reviewed the above complaint, Plaintiff Troy Scheffler affirms under penalty of law that all statements above, excluding those made on information and belief, are true to the best of Plaintiff's present knowledge.

### **ACKNOWLEDGEMENT**

Plaintiff Troy Scheffler hereby acknowledges that sanctions may be imposed under the

• circumstances set forth in Minn. Stat. § 549.211.

Date: 05-02-2025



Troy Scheffler

Plaintiff

26359 Shandy Trl

Merrifield, MN 56465

763-225-7702



MINNESOTA  
JUDICIAL  
BRANCH