

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF RAMSEY

SECOND JUDICIAL DISTRICT

Troy Kenneth Scheffler

Court File No.: 62-CV-25-6308

Plaintiff,

v.

Ramsey County, a political subdivision of the
State of Minnesota,**DEFENDANTS' ANSWER TO
COMPLAINT**Bob B. Fletcher, in his official capacity as
Ramsey County Sheriff and MGDPA
Responsible Authority,

And

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

Defendants.

Defendants Ramsey County its Answer to Plaintiff's Complaint, states and alleges as follows:

1. Denies each and every allegation of said Complaint except as is hereinafter stated, qualified, or admitted.
2. As to paragraph 1, defendants admit that the court has subject matter jurisdiction.
3. As to paragraph 2, defendants admit that venue is proper.
4. As to paragraph 3, lacks knowledge or information sufficient to form a belief about the truth of the allegation, which has the effect of a denial.
5. As to paragraph 4, admits.
6. As to paragraph 5, admits.

7. As to paragraph 6, admits.
8. As to paragraphs 7-12, lacks knowledge or information sufficient to form a belief about the truth of the allegation, which has the effect of a denial.
9. As to paragraph 13, admits.
10. As to paragraph 14, denies; the current Data Practice Policy for the sheriff's office states that "Joshua Adams" is the "RA Designee and Compliance Official" and that Sheriff Bob Fletcher is the "Responsible Authority." This policy is publicly available at the following website: <https://www.ramseycountymn.gov/your-government/open-government/data-practices-requests/data-practices-responsible-authorities>.
11. As to paragraph 15, denies.
12. As to paragraph 16, lacks knowledge or information sufficient to form a belief about the truth of the allegation, which has the effect of a denial.
13. As to paragraphs 17-22, denies
14. As to paragraph 23, lacks knowledge or information sufficient to form a belief about the truth of the allegation, which has the effect of a denial.
15. As to paragraph 24, denies.
16. As to paragraph 25, denies that Plaintiff is entitled to damages.
17. As to paragraph 26, restates and realleges its Answer and responses to paragraphs 1-25 of the Complaint.
18. As to paragraphs 27-29, lacks knowledge or information sufficient to form a belief about the truth of the allegation, which has the effect of a denial.
19. As to paragraphs 30-31, denies.
20. As to paragraph 32, denies that Plaintiff is entitled to damages.

21. As to paragraph 33, lacks knowledge or information sufficient to form a belief about the truth of the allegation, which has the effect of a denial.
22. As to paragraph 34-36, denies that Plaintiff is entitled to damages or any other kind of relief.
23. As to paragraphs 37-40, the Court has dismissed Claim II pursuant to the Defendants' Motion to Dismiss under Minn. R. Civ. P. 12.02(e). (*See* Order, Index #39), thus no response is required. To the extent a response is required, denies.
24. As to paragraphs 41-43, the Court has dismissed Claim III pursuant to the Defendants' Motion to Dismiss under Minn. R. Civ. P. 12.02(e). (*See* Order, Index #39), thus no response is required. To the extent a response is required, denies.
25. As to Plaintiff's prayer for relief, denies that Plaintiff is entitled to any relief.

AFFIRMATIVE DEFENSES

1. Plaintiff's Complaint fails to state a claim upon which relief can be granted.
2. Plaintiff's claims are barred by assumption of the risk.
3. Plaintiff's claims are barred by contributory negligence.
4. Plaintiff's claims are barred by statutory immunity, discretionary immunity, official immunity, and recreational immunity.
5. Defendants are entitled to all the rights, privileges, limitations of liabilities and immunities provided under Minn. Stat. Chapter 466.

WHEREFORE, Ramsey County prays that Plaintiff take nothing by her pretended cause of action and that it have judgment in its favor, together with costs and disbursements.

Minn. Stat. § 549.211 Acknowledgement

The party or parties on whose behalf the attached pleading, motion, or paper is served acknowledge through their undersigned counsel that sanctions may be imposed pursuant to Minn. Stat. § 549.211.

Dated: October 8, 2025

JOHN J. CHOI
RAMSEY COUNTY ATTORNEY

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