
STATE OF MINNESOTA**DISTRICT COURT****COUNTY OF RAMSEY****SECOND JUDICIAL DISTRICT**
Case Type: Other Civil

The County of Ramsey by its County
Attorney, John Choi, and The State of
Minnesota by its Attorney General, Keith
Ellison,

Court File No.:

Plaintiffs,

v.

COMPLAINT

The Ville, a criminal gang, sued as an
unincorporated association,

Defendant.

I. INTRODUCTION.

1. This is an action for injunctive relief under Minnesota Statutes sections 617.91-617.97, commonly referred to as the “Minnesota civil gang nuisance law,” and for declaratory relief under the Uniform Declaratory Judgment Act, Minnesota Statutes section 555.01 et. seq. Plaintiffs seek a judicial determination that Defendant, a “criminal gang” as defined under Minnesota Statutes section 617.91, subdivision 3, has created a public nuisance as defined in Minnesota Statutes section 617.92, subdivision 1, at the Minnesota State Fair. To abate this public nuisance at the upcoming 2026 Minnesota State Fair, Plaintiffs seek to enjoin Defendant and its members from engaging in certain nuisance-causing conduct within a defined “Safety Zone,” an area encompassing the State Fairgrounds and the immediate vicinity used by members of the public and State Fair visitors for parking and transit for the event. Plaintiffs ask the Court to impose these

restrictions on the Defendant and its members for the duration of the State Fair and the morning after. Plaintiffs' proposed "Safety Zone" is depicted in the Appendix to this Complaint.

II. PARTIES

2. Plaintiff, Ramsey County, is a municipal corporation of the State of Minnesota and a home rule charter County pursuant to the Minnesota Constitution Article 12 section 4 and Minnesota Statutes section 410.04, and is authorized to bring this action pursuant to Minnesota Statutes section 617.93(a) along with the Minnesota Attorney General's Office.

3. Plaintiff State of Minnesota is a sovereign state, represented through its chief legal officer, Attorney General Keith Ellison, who is authorized to bring this action pursuant to Minnesota Statutes sections 8.01 and 617.93(a).

4. Defendant is part of an unincorporated association consisting of two or more persons who are residents of Minnesota and who associate and act within Minnesota under a common name pursuant to Minnesota Statutes section 540.151 and 540.152.

III. JURISDICTION AND VENUE

5. The Court has jurisdiction to decide Plaintiffs' claims pursuant to Minnesota Statute sections 617.91-617.97 and the Uniform Declaratory Judgment Act, Minnesota Statute section 555.01 et. seq, Minnesota common law and, with respect to Plaintiff State of Minnesota, Minnesota Statutes section 8.01 and the State's *parens patriae* authority.

6. Venue is proper with this Court pursuant to Minnesota Statute section 542.09.

COUNT I

**DEFENDANT IS A PUBLIC NUISANCE AND
ENGAGES IN PUBLIC NUISANCE ACTIVITIES
DURING THE MINNESOTA STATE FAIR
(Minn. Stat. § 617.92 Subd. 1)**

7. Plaintiffs re-allege all prior paragraphs of this Complaint.

8. Defendant is a “criminal gang” as that term is defined in Minnesota Statutes section 609.229, because it is an ongoing organization, association, or group of at least three people that (1) has as a primary activity the commission of offenses listed in Minnesota Statutes section 609.11, subd. 9, namely, aggravated assault, drive-by shootings, and weapons violations; (2) has a common name; and (3) includes members who have engaged in a pattern of criminal activity.

9. Defendant has “continuously and regularly” engaged in “gang activities” as those respective terms are defined in Minnesota Statutes section 617.91, subdivisions 2 and 4, including the “Safety Zone.” Examples of gang activities engaged in by Defendant and its individual members on a continuous and regular basis are the following:

- i) Ville members are seen in a video fighting members of a rival gang at the State Fair in 2025. This fight takes place near the Midway where a large number of people gather to play carnival games and ride amusement park rides. This fight caused panic and a scattering of the crowd that was near by. A full depiction of this incident can be found in **Exhibit D** which is attached to the declaration of Deputy Benjamin Seidl filed with Plaintiffs’ motion for temporary injunction in this matter.
- ii) Ville members are seen throwing gang signs and taunting rival gang members before another fight broke out. This incident again captures Ville members chasing after a rival gang to assault individuals within the Safety Zone. A full depiction of this incident can be found in **Exhibit E** which is attached to the declaration of Deputy Benjamin Seidl filed with Plaintiffs’ motion for temporary injunction in this matter.
- iii) On May 4, 2026, members of the Ville were arrested in relation to a shooting that occurred during the Metro State graduation near Grand Casino Arena in St. Paul.
- iv) On July 25, 2026, an Instagram known to Deputy Seidl being related to criminal Ville activities posted on its story about the 2026 State Fair. Deputy Seidl captures it in his declaration as Figure 2. This screenshot shows it references the Ville and primary rival gang along with others. The heading “State fair bumps,” is slang for violent altercations. Deputy Seidl describes Figure 2 in full within his Declaration.
- v) On July 25, 2026, a separate social media account known to Deputy Seidl

posted on its story about the 2026 State Fair. This is captured as Figure 4 in Deputy Seidl's declaration. Figure 3 resembles a fight poster as if it is promoting a boxing match. Instead of boxing, this Instagram story has a tagline of "THE BIGGEST BATTLE OF THE SUMMER" and the date "August 29th LIVE AT THE MINNESOTA STATE FAIR." Again, both Ville and rival gangs are listed on this story.

It is clear to Deputy Seidl that this gang and their rivals have used the Safety Zone to bolster their reputations, assault and batter their rivals, and be a public nuisance to all fair goers. What is also clear is the Ville's intent to escalate this behavior, create more of a public nuisance and have named specific dates for these altercations to occur.

10. Defendant has created a public nuisance under Minnesota Statutes section 617.91, subdivision 1, in St. Paul, Minnesota, including within the Safety Zone.

11. Each of the individuals identified in Exhibit A are members of the Defendants' criminal gang and are actively involved in the Defendants' gang activities.

12. Plaintiffs are explicitly and statutorily entitled pursuant to Minnesota Statute section 617.94, to either a temporary or permanent Order from this Court: a) enjoining Defendants from engaging in its gang activities; and b) imposing other reasonable requirements to prevent Defendant from engaging in future gang activities.

13. That Defendant has intentionally and purposefully engaged in gang activities that constitutes a public nuisance as set forth in Minnesota Statutes section 617.91, subdivision 1. Defendant engages in such gang activities throughout the Twin Cities metropolitan area, including the Safety Zone. These gang activities include: (1) a shooting committed by a Ville gang member against rivals during the 2025 Burnsville High School graduation, and (2) multiple assaults and brawls carried out between The Ville and rival gang members on the last day of the 2025 State Fair.

14. Defendant, on information and belief, intends to continue its public nuisance activities within the Safety Zone during the 2026 Minnesota State Fair.

15. Plaintiffs are explicitly and statutorily entitled pursuant to Minnesota Statute section 617.94, to either a temporary or permanent Order from this Court: a) enjoining Defendant from engaging in its gang activities; and b) imposing other reasonable requirements to prevent Defendant from engaging in future gang activities.

PRAYER FOR RELIEF

WHEREFORE, Ramsey County, by its County Attorney John Choi, and the State of Minnesota, by its Attorney General Keith Ellison, respectfully request that judgment be entered in favor of Plaintiffs and against Defendant and all of its members, including each of the individuals identified in Exhibit G, jointly and severally, as follows:

1. For the following declaratory relief:
 - a. For declaration that Defendant is a “criminal gang” as defined in Minnesota Statutes section 609.229 that has “continuously and regularly” engaged in “gang activities” as those respective terms are defined in Minnesota Statutes section 617.91, subdivisions 2 and 4.
 - b. A declaration that each of the individuals identified in Exhibit G are members of Defendant’s criminal gang.
 - c. A declaration that Defendant intentionally and purposefully engages in public nuisance activities as defined in Minnesota Statutes section 617.91, subdivision 1. subdivision 1 throughout St. Paul, Minnesota, including the Safety Zone.
 - d. A declaration that Plaintiff is explicitly and statutorily entitled pursuant to Minnesota Statutes section 617.94, to either a temporary or permanent Order from this Court: a) enjoining Defendant from engaging in its gang activities; and b) imposing other reasonable requirements to prevent

Defendant from engaging in future gang activities.

2. For the following injunctive relief:

- a. For Order Granting Temporary Injunction in which all of the persons identified in Exhibit G, (collectively referred to as the “Enjoined Persons,” or singularly as an “Enjoined Person”) are enjoined, prohibited and restrained from engaging in or performing directly or indirectly, any of the following activities in the Safety Zone, between 8:00 A.M. August 27, 2026, and 06:00 A.M. September 8, 2026:

i. **No Association With Known Criminal Gang Members:**

Associating, standing, sitting, walking, driving, bicycling, gathering or appearing, anywhere in public view or any place accessible to the public, with any of the Enjoined Persons or other members of the Defendant criminal gang known as Muddy, known to an Enjoined Person to be a member of the Defendant criminal gang known as Muddy, but not including when such described individuals are inside a church.

- ii. **No Intimidation:** Confronting, intimidating, annoying, harassing, threatening, challenging, provoking, assaulting or battering any person known to be a witness to, known to be a victim of, or known to have complained about any of the criminal gang activities of the Defendant criminal gang known as The Ville; and

3. For such other and further relief as the Court deems just and equitable.

JOHN CHOI COUNTY ATTORNEY
RAMSEY COUNTY, MINNESOTA

Dated: August 5, 2026

/s/ Marcelo A Neblett

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ACKNOWLEDGMENT

The County of Ramsey, by its attorney, hereby acknowledges that costs, disbursements, and reasonable attorney and witness fees may be awarded to defendant in this action pursuant to Minn. Stat. §549.211.

JOHN CHOI COUNTY ATTORNEY
RAMSEY COUNTY, MINNESOTA

Dated: August 5, 2026

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