

Minnesota Private Business Council,  
  
Plaintiff,

v.

Tim Walz, in his official capacity as Governor  
of Minnesota;

Keith Ellison, in his official capacity as  
Minnesota Attorney General;

Nicole Blissenbach, in her official capacity as  
Commissioner of the Minnesota Department  
of Labor and Industry;

Matt Varilek, in his official capacity as  
Commissioner of the Minnesota Department  
of Employment and Economic Development;

Grace Arnold, in her official capacity as  
Commissioner of the Minnesota Department  
of Commerce;

Paul Marquart, in his official capacity as  
Commissioner of the Minnesota Department  
of Revenue,

Defendants.

Case Type: Civil Other/Miscellaneous

Court File No. \_\_\_\_\_

**COMPLAINT**

**DECLARATORY AND INJUNCTIVE  
RELIEF REQUESTED**

**INTRODUCTION**

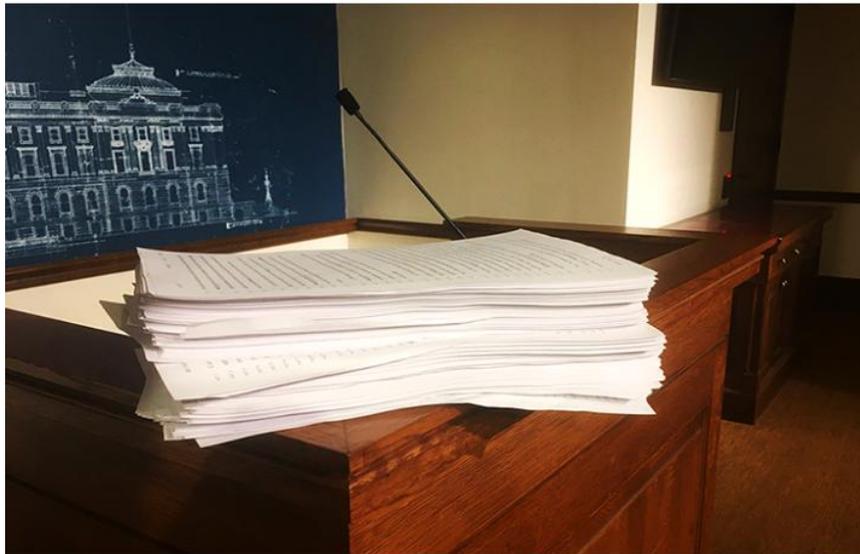
1. Minnesota's Constitution requires every bill passed by the legislature to have only one subject. Art. IV, §17.

2. When the legislature and governor violate that requirement and enact a gargantuan law covering a vast array of subjects, the result is that Minnesota businesses are drowned in red tape, jobs and growth are squeezed out of our economy, government waste explodes, and costs and taxes

spiral ever upward—all without the full and fair consideration by the people’s representatives that the Constitution promises. This case arises from just such a catastrophic violation.

3. The Minnesota Supreme Court has repeatedly warned the Legislature to follow this Single Subject and Title Clause, expressing increasing concern about its violation and the “likely possibility [...] that if an improper provision is included in a major appropriation law the entire law could fall.” *Blanch v. Suburban Hennepin Reg'l Park Dist.*, 449 N.W.2d 150, 156 (Minn. 1989) (Popovich, C.J., concurring specially).

4. In 2024, the Legislature ignored the Supreme Court’s repeated warnings and passed CCR-HF5247 (Chapter 127;<sup>1</sup> the “2024 Omnibus Bill”). This massive omnibus bill covers every subject imaginable, from combative sports to paid leave. At nearly 1500 pages and 73 Articles, it appears to be the longest statute ever enacted by the Minnesota legislature:<sup>2</sup>



A copy of the 1,430-page mega-omnibus bill the Minnesota Legislature passed right before deadline. Credit: MinnPost photo by Peter Callaghan

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<sup>1</sup> Minnesota Session Laws - 2024, Regular Session, Chapter 127, H.F. No. 5247, *available at* <https://www.revisor.mn.gov/laws/2024/0/Session+Law/Chapter/127/>.

<sup>2</sup> Inserted photograph: Peter Callaghan and Ava Kian, *MinnPost’s massive list of what the Minnesota Legislature passed (and didn’t pass) in 2024*, MinnPost (May 20, 2024), <https://www.minnpost.com/state-government/2024/05/minnposts-massive-list-of-what-the-minnesota-legislature-passed-and-didnt-pass-in-2024/>.

5. This monster bill was created in the very late hours of the very last day to pass legislation in the 2024 session, when a conference committee of the Minnesota legislature combined nine previously-distinct omnibus bills into one mega-omnibus bill covering such disparate topics as “taxes, health, higher education, firearms, energy and agriculture, human services, health and human services, and paid leave.” *Minnesota Gun Owners Caucus v. Walz*, 62-CV-25-1083, Doc. 63 at 23 (Minn. Dist. Ct. Aug. 18, 2025) (hereinafter “*MGOC*”). In chaotic late-night sessions, the House and Senate then “considered” and passed this gigantic bill in mere minutes.

6. The 2024 Omnibus Bill’s hundreds-of-lines-long title, reprinted below, itself shows that it embraces a plethora of subjects:

A bill for an act

relating to the operation and financing of state government; modifying trunk highway bonds, transportation policy, combative sports, construction codes and licensing, the Bureau of Mediation Services, the Public Employee Labor Relations Act, employee misclassification, earned sick and safe time, University of Minnesota collective bargaining, broadband and pipeline safety, housing policy, and transportation network companies; expediting rental assistance; establishing registration for transfer care specialists; establishing licensure for behavior analysts; establishing licensure for veterinary technicians and a veterinary institutional license; modifying provisions of veterinary supervision; modifying specialty dentist licensure and dental assistant licensure by credentials; removing additional collaboration requirements for physician assistants to provide certain psychiatric treatment; modifying social worker provisional licensure; establishing guest licensure for marriage and family therapists; modifying pharmacy provisions for certain reporting requirements and change of ownership or relocation; modifying higher education policy provisions; amending the definition of trigger activator; increasing penalties for transferring firearms to certain persons who are ineligible to possess firearms; amending agriculture policy provisions; establishing and modifying agriculture programs; providing broadband appropriation transfer authority; requiring an application for federal broadband aid; adding and modifying provisions governing energy policy; establishing the Minnesota Energy Infrastructure Permitting Act; modifying provisions related to disability services, aging services, substance use disorder treatment services, priority admissions to state-operated programs and civil commitment, and Direct Care and Treatment; modifying provisions related to licensing of assisted living facilities; modifying provisions governing the Department of Human Services, human services health care policy, health care finance, and licensing policy; modifying provisions governing the Department of Health, health policy, health insurance, and health

care; modifying provisions governing pharmacy practice and behavioral health; establishing an Office of Emergency Medical Services and making conforming changes; modifying individual income taxes, minerals taxes, tax-forfeited property, and miscellaneous tax provisions; modifying state employee compensation; modifying paid leave provisions; imposing penalties; authorizing administrative rulemaking; making technical changes; requiring reports; appropriating money; amending Minnesota Statutes 2022, sections 3.7371, subdivisions 2, 3, by adding subdivisions; 13.46, subdivisions 1, as amended, 10, as amended; 13.6905, by adding a subdivision; 13.824, subdivision 1, by adding a subdivision; 16A.055, subdivision 1a, by adding a subdivision; 17.116, subdivision 2; 17.133, subdivision 1; 18B.01, by adding a subdivision; 18B.26, subdivision 6; 18B.28, by adding a subdivision; 18B.305, subdivision 2; 18B.32, subdivisions 1, 3, 4, 5; 18B.33, subdivisions 1, 5, 6; 18B.34, subdivisions 1, 4; 18B.35, subdivision 1; 18B.36, subdivisions 1, 2; 18B.37, subdivisions 2, 3; 18C.005, subdivision 33, by adding a subdivision; 18C.115, subdivision 2; 18C.215, subdivision 1; 18C.221; 18C.70, subdivisions 1, 5; 18C.71, subdivisions 1, 2, 4, by adding a subdivision; 18C.80, subdivision 2; 18D.301, subdivision 1; 28A.10; 28A.151, subdivisions 1, 2, 3, 5, by adding a subdivision; 28A.21, subdivision 6; 31.74; 31.94; 32D.30; 41B.039, subdivision 2; 41B.04, subdivision 8; 41B.042, subdivision 4; 41B.043, subdivision 1b; 41B.045, subdivision 2; 41B.047, subdivision 1; 43A.05, subdivision 3; 43A.18, subdivisions 2, 3, 9; 43A.24, by adding a subdivision; 62A.0411; 62A.15, subdivision 4, by adding a subdivision; 62A.28, subdivision 2; 62D.02, subdivision 7; 62D.04, subdivision 5; 62D.12, subdivision 19; 62D.14, subdivision 1; 62D.20, subdivision 1; 62D.22, subdivision 5, by adding a subdivision; 62J.49, subdivision 1; 62J.61, subdivision 5; 62M.01, subdivision 3; 62M.02, subdivisions 1a, 5, 11, 12, 21, by adding a subdivision; 62M.04, subdivision 1; 62M.05, subdivision 3a; 62M.07, subdivisions 2, 4, by adding a subdivision; 62M.10, subdivisions 7, 8; 62M.17, subdivision 2; 62Q.097, by adding a subdivision; 62Q.14; 62Q.19, subdivisions 3, 5, by adding a subdivision; 62Q.73, subdivision 2; 62V.05, subdivision 12; 62V.08; 62V.11, subdivision 4; 65B.472; 103I.621, subdivisions 1, 2; 116C.83, subdivision 6; 116J.395, subdivision 6, by adding subdivisions; 116J.396, by adding a subdivision; 116J.871, subdivision 4; 123B.53, subdivision 1; 134A.09, subdivision 2a; 134A.10, subdivision 3; 135A.15, as amended; 136A.091, subdivision 3; 136A.1241, subdivision 3; 136A.1701, subdivisions 4, 7; 136A.29, subdivision 9; 136A.62, by adding subdivisions; 136A.63, subdivision 1; 136A.646; 136A.65, subdivision 4; 136A.675, subdivision 2; 136A.69, subdivision 1; 136A.821, subdivision 5, by adding a subdivision; 136A.822, subdivisions 1, 2, 6, 7, 8; 136A.824, subdivisions 1, 2; 136A.828, subdivision 3, by adding a subdivision; 136A.829, subdivision 3, by adding a subdivision; 144.05, subdivisions 6, 7, by adding a subdivision; 144.0572, subdivision 1; 144.058; 144.0724, subdivisions 2, 3a, 4, 6, 7, 8, 9, 11; 144.1464, subdivisions 1, 2, 3; 144.1501, subdivision 5; 144.1911, subdivision 2; 144.212, by adding a subdivision; 144.216, subdivision 2, by adding subdivisions; 144.218, by adding a

subdivision; 144.292, subdivision 6; 144.293, subdivisions 2, 4, 9, 10; 144.493, by adding a subdivision; 144.494, subdivision 2; 144.551, subdivision 1; 144.555, subdivisions 1a, 1b, 2, by adding subdivisions; 144.605, by adding a subdivision; 144.7067, subdivision 2; 144.99, subdivision 3; 144A.10, subdivisions 15, 16; 144A.471, by adding a subdivision; 144A.474, subdivision 13; 144A.61, subdivision 3a; 144A.70, subdivisions 3, 5, 6, 7; 144A.71, subdivision 2, by adding a subdivision; 144A.72, subdivision 1; 144A.73; 144E.001, subdivision 3a, by adding subdivisions; 144E.101, by adding a subdivision; 144E.16, subdivisions 5, 7; 144E.19, subdivision 3; 144E.27, subdivisions 3, 5, 6; 144E.28, subdivisions 3, 5, 6, 8; 144E.285, subdivisions 1, 2, 4, 6, by adding subdivisions; 144E.287; 144E.305, subdivision 3; 144G.08, subdivision 29; 144G.10, by adding a subdivision; 144G.16, subdivision 6; 144G.41, subdivision 1, by adding subdivisions; 144G.63, subdivisions 1, 4; 144G.64; 145.61, subdivision 5; 146B.03, subdivision 7a; 146B.10, subdivisions 1, 3; 148.511; 148.512, subdivision 17a; 148.513, subdivisions 1, 2, 3, by adding a subdivision; 148.514, subdivision 2; 148.515, subdivision 1; 148.518; 148.519, subdivision 1, by adding a subdivision; 148.5191, subdivision 1, by adding a subdivision; 148.5192, subdivisions 1, 2, 3; 148.5193, subdivision 1, by adding a subdivision; 148.5194, subdivision 8, by adding a subdivision; 148.5195, subdivisions 5, 6; 148.5196, subdivision 3; 148D.061, subdivisions 1, 8; 148D.062, subdivisions 3, 4; 148D.063, subdivisions 1, 2; 148E.055, by adding subdivisions; 149A.01, subdivision 3; 149A.02, subdivisions 3, 3b, 13a, 16, 23, 26a, 27, 35, 37c, by adding subdivisions; 149A.03; 149A.09; 149A.11; 149A.60; 149A.61, subdivisions 4, 5; 149A.62; 149A.63; 149A.65; 149A.70, subdivisions 1, 2, 3, 4, 5, 7; 149A.71, subdivisions 2, 4; 149A.72, subdivisions 3, 9; 149A.73, subdivision 1; 149A.74, subdivision 1; 149A.90, subdivisions 2, 4, 5; 149A.93, subdivision 3; 149A.94, subdivisions 1, 3, 4; 149A.97, subdivision 2; 150A.06, subdivisions 1c, 8; 151.01, subdivisions 23, 27; 151.065, subdivision 7, by adding subdivisions; 151.066, subdivisions 1, 2, 3; 151.212, by adding a subdivision; 151.37, by adding a subdivision; 151.74, subdivision 6; 156.001, by adding subdivisions; 156.07; 156.12, subdivisions 2, 4; 161.089; 161.14, by adding a subdivision; 161.3203, subdivision 4; 161.45, by adding subdivisions; 161.46, subdivision 1; 162.02, by adding a subdivision; 162.081, subdivision 4; 162.09, by adding a subdivision; 162.145, subdivision 5; 168.09, subdivision 7; 168.092; 168.127; 168.301, subdivision 3; 168.33, by adding a subdivision; 168A.10, subdivision 2; 168A.11, subdivisions 1, 2; 168B.035, subdivision 3; 169.011, by adding subdivisions; 169.04; 169.06, by adding subdivisions; 169.14, subdivision 10, by adding subdivisions; 169.18, by adding a subdivision; 169.21, subdivision 6; 169.222, subdivisions 2, 6a, 6b; 169.346, subdivision 2; 169.974, subdivision 5; 169.99, subdivision 1; 171.01, by adding subdivisions; 171.06, subdivision 3b; 171.061, by adding a subdivision; 171.12, by adding a subdivision; 171.13, subdivision 9; 171.16, subdivision 3; 174.02, by adding a subdivision; 174.185, subdivisions 2, 3, by adding subdivisions; 174.40, subdivision 3; 174.75, subdivisions 1, 2, by adding a subdivision; 177.27,

subdivision 3; 179A.041, subdivision 2; 179A.09, by adding subdivisions; 179A.11, subdivisions 1, 2, by adding a subdivision; 179A.12, subdivision 5; 179A.13, subdivisions 1, 2; 179A.40, subdivision 1; 179A.54, subdivision 5; 181.171, subdivision 1; 181.722; 181.723; 181.960, subdivision 3; 214.025; 214.04, subdivision 2a; 214.29; 214.31; 214.355; 216A.037, subdivision 1; 216A.07, subdivision 3; 216B.098, by adding a subdivision; 216B.16, subdivisions 6c, 8; 216B.17, by adding a subdivision; 216B.2402, subdivisions 4, 10, by adding a subdivision; 216B.2403, subdivisions 2, 3, 5, 8; 216B.241, subdivisions 1c, 2, 11, 12; 216B.2421, subdivision 2; 216B.2425, subdivisions 1, 2, by adding a subdivision; 216B.2427, subdivision 1, by adding a subdivision; 216B.243, subdivisions 3, 3a, 4, 9; 216B.246, subdivision 3; 216C.10; 216C.435, subdivisions 3a, 3b, 4, 10, by adding subdivisions; 216C.436, subdivisions 1, 4, 7, 8, 10; 216E.02, subdivision 1; 216E.08, subdivision 2; 216E.11; 216E.13; 216E.14; 216E.15; 216E.16; 216E.18, subdivision 2a; 221.0255, subdivisions 4, 9, by adding a subdivision; 232.21, subdivisions 3, 7, 11, 12, 13; 245.462, subdivision 6; 245.4663, subdivision 2; 245.821, subdivision 1; 245.825, subdivision 1; 245A.043, subdivisions 2, 4, by adding subdivisions; 245A.07, subdivision 6; 245A.11, subdivision 2a; 245C.05, subdivision 5; 245C.10, subdivision 18; 245C.14, subdivision 1, by adding a subdivision; 245C.15, subdivisions 3, 4; 245C.22, subdivision 4; 245C.24, subdivisions 2, 5; 245C.30, by adding a subdivision; 245F.09, subdivision 2; 245F.14, by adding a subdivision; 245F.17; 245G.07, subdivision 4; 245G.08, subdivisions 5, 6; 245G.10, by adding a subdivision; 245G.22, subdivisions 6, 7; 245I.02, subdivisions 17, 19; 245I.04, subdivision 6; 245I.10, subdivision 9; 245I.11, subdivision 1, by adding a subdivision; 245I.20, subdivision 4; 245I.23, subdivisions 14, 19a; 246.018, subdivision 3, as amended; 246.129, as amended; 246.13, subdivision 2, as amended; 246.234, as amended; 246.36, as amended; 246.511, as amended; 252.27, subdivision 2b; 252.282, subdivision 1, by adding a subdivision; 254B.01, by adding subdivisions; 256.01, subdivision 41, by adding a subdivision; 256.88; 256.89; 256.90; 256.91; 256.92; 256.9657, subdivision 8, by adding a subdivision; 256.969, by adding subdivisions; 256.9755, subdivisions 2, 3; 256B.02, subdivision 11; 256B.035; 256B.056, subdivisions 1a, 10; 256B.0622, subdivisions 2a, 3a, 7a, 7d; 256B.0623, subdivision 5; 256B.0625, subdivisions 10, 12, 32, 39, by adding subdivisions; 256B.0757, subdivisions 4a, 4d; 256B.076, by adding a subdivision; 256B.0911, subdivisions 12, 17, 20; 256B.0913, subdivision 5a; 256B.0924, subdivision 3; 256B.0943, subdivisions 3, 12; 256B.0947, subdivision 5; 256B.434, by adding a subdivision; 256B.49, subdivision 16, by adding a subdivision; 256B.4911, by adding subdivisions; 256B.4912, subdivision 1; 256B.69, subdivisions 2, 4; 256B.76, subdivision 6; 256B.77, subdivision 7a; 256B.795; 256I.04, subdivision 2f; 256K.45, subdivision 2; 256L.12, subdivision 7; 256R.02, subdivision 20; 256S.07, subdivision 1; 256S.205, subdivisions 2, 3, 5, by adding a subdivision; 259.52, subdivisions 2, 4; 260E.33, subdivision 2, as amended; 270B.14, subdivision 17, by adding a subdivision; 270C.21; 273.135, subdivision

2; 275.065, by adding a subdivision; 276.04, by adding a subdivision; 276A.01, subdivision 17; 276A.06, subdivision 8; 279.06, subdivision 1; 281.23, subdivision 2; 282.01, subdivision 6; 282.241, subdivision 1; 282.301; 289A.08, subdivision 1; 297A.815, subdivision 3; 297F.01, subdivisions 10b, 19; 298.17; 298.2215, subdivision 1; 298.28, subdivision 8; 298.282, subdivision 1; 298.292, subdivision 2; 299E.01, subdivision 2; 317A.811, subdivision 1; 326B.081, subdivisions 3, 6, 8; 326B.082, subdivisions 1, 2, 4, 6, 7, 10, 11, 13, by adding a subdivision; 326B.701; 326B.89, subdivision 5; 341.28, by adding a subdivision; 341.29; 383B.145, subdivision 5; 430.01, subdivision 2; 430.011, subdivisions 1, 2, 3; 430.023; 430.031, subdivision 1; 430.13; 447.42, subdivision 1; 462A.02, subdivision 10; 462A.05, subdivisions 14a, 14b, 15, 15b, 21, 23; 462A.07, by adding subdivisions; 462A.21, subdivision 7; 462A.35, subdivision 2; 462A.37, by adding a subdivision; 462A.40, subdivisions 2, 3; 473.13, by adding a subdivision; 473.3927; 473.452; 480.15, by adding a subdivision; 524.3-801, as amended; 604A.04, subdivision 3; 624.7141; 626.892, subdivision 10; Minnesota Statutes 2023 Supplement, sections 3.855, subdivisions 2, 3, 6; 10.65, subdivision 2; 13.43, subdivision 6; 13.46, subdivision 2, as amended; 15.01; 15.06, subdivision 1, as amended; 15A.0815, subdivision 2; 15A.082, subdivisions 1, 3, 7; 17.055, subdivision 3; 17.133, subdivision 3; 17.134, subdivision 3, by adding a subdivision; 17.710; 18C.425, subdivision 6; 18K.06; 43A.08, subdivisions 1, 1a; 62J.84, subdivision 10; 62Q.46, subdivision 1; 62Q.473, by adding subdivisions; 82.75, subdivision 8; 116C.779, subdivision 1; 116C.7792; 116J.871, subdivisions 1, as amended, 2; 123B.935, subdivision 1; 135A.121, subdivision 2; 135A.161, by adding a subdivision; 135A.162, subdivision 2; 136A.1241, subdivision 5; 136A.1465, subdivisions 1, 2, 3, 4, 5; 136A.62, subdivision 3; 136A.833, subdivision 2; 136F.38, subdivision 3; 142A.03, by adding a subdivision; 144.0526, subdivision 1; 144.1501, subdivision 2; 144.1505, subdivision 2; 144.651, subdivision 10a; 144A.4791, subdivision 10; 144E.101, subdivisions 6, 7, as amended; 145.561, subdivision 4; 145D.01, subdivision 1; 148.5195, subdivision 3; 148.5196, subdivision 1; 148B.392, subdivision 2; 151.555, subdivisions 1, 4, 5, 6, 7, 8, 9, 11, 12; 151.74, subdivision 3; 152.126, subdivision 6; 161.178; 161.46, subdivision 2; 162.146, by adding a subdivision; 168.1259; 168.29; 169.011, subdivision 27; 169.223, subdivision 4; 171.06, subdivision 3; 171.0705, subdivision 2; 171.301, subdivisions 3, 6; 174.49, subdivision 6; 174.634, subdivision 2, by adding a subdivision; 177.27, subdivisions 1, 2, 4, 7; 177.50, by adding subdivisions; 179A.03, subdivisions 14, 18; 179A.041, subdivision 10; 179A.06, subdivision 6; 179A.07, subdivisions 8, 9; 179A.10, subdivision 2; 179A.12, subdivisions 2a, 6, 11; 181.032; 181.9445, subdivisions 4, 5, by adding a subdivision; 181.9446; 181.9447, subdivisions 1, 3, 5, 10, 11, by adding a subdivision; 181.9448, subdivisions 1, 2, 3; 216B.243, subdivision 8; 216C.08; 216C.09; 216C.331, subdivision 1; 216C.435, subdivision 8; 216C.436, subdivisions 1b, 2; 216E.06; 216E.07; 216E.10, subdivisions 1, 2, 3; 219.015, subdivision 2; 245.4889, subdivision 1; 245.735, subdivision 3; 245.91, subdivision

4; 245.991, subdivision 1; 245A.03, subdivisions 2, as amended, 7, as amended; 245A.043, subdivision 3; 245A.07, subdivision 1, as amended; 245A.11, subdivision 7; 245A.16, subdivision 1, as amended; 245A.211, subdivision 4; 245A.242, subdivision 2; 245C.02, subdivision 13e; 245C.031, subdivision 4; 245C.08, subdivision 1; 245C.15, subdivisions 2, 4a; 245C.31, subdivision 1; 245G.07, subdivision 2; 245G.22, subdivisions 2, 17; 245I.04, subdivision 19; 246.54, subdivisions 1a, 1b; 246C.01; 246C.02, as amended; 246C.04, as amended; 246C.05, as amended; 253B.10, subdivision 1, as amended; 254B.04, subdivision 1a; 254B.05, subdivisions 1, 5, as amended; 254B.19, subdivision 1; 256.043, subdivision 3; 256.0471, subdivision 1, as amended; 256.4764, subdivision 3; 256.9631; 256.969, subdivision 2b; 256.9756, subdivisions 1, 2; 256B.0622, subdivisions 7b, 8; 256B.0625, subdivisions 3a, 5m, 9, 13e, as amended, 13f, 13k, 16; 256B.064, subdivision 4; 256B.0671, subdivisions 3, 5; 256B.0701, subdivision 6; 256B.0911, subdivision 13; 256B.0913, subdivision 5, as amended; 256B.092, subdivision 1a; 256B.0947, subdivision 7; 256B.0949, subdivision 15; 256B.49, subdivision 13; 256B.764; 256B.766; 256D.01, subdivision 1a; 256I.05, subdivisions 1a, 11; 256L.03, subdivision 1; 256L.04, subdivision 10; 256R.55; 260.761, by adding a subdivision; 268B.01, subdivisions 3, 5, 8, 15, 23, 44, by adding subdivisions; 268B.04; 268B.06, subdivisions 2, 3, 4, 5, by adding a subdivision; 268B.07, subdivisions 1, 2, 3; 268B.085, subdivision 3; 268B.09, subdivisions 1, 6, 7; 268B.10, subdivisions 1, 2, 3, 6, 12, 16, 17, by adding subdivisions; 268B.14, subdivisions 3, 7, by adding subdivisions; 268B.15, subdivision 7; 268B.155, subdivision 2; 268B.185, subdivision 2; 268B.19; 268B.26; 268B.27, subdivision 2; 268B.29; 270B.14, subdivision 1; 290.0661, subdivisions 4, 8, by adding a subdivision; 297A.993, subdivision 2a; 298.018, subdivision 1; 298.28, subdivisions 7a, 16; 299A.642, subdivision 15; 326B.106, subdivision 1; 341.25; 341.28, subdivision 5; 341.30, subdivision 4; 341.321; 341.33, by adding a subdivision; 341.355; 357.021, subdivision 6; 462A.05, subdivisions 14, 45; 462A.22, subdivision 1; 462A.37, subdivisions 2, 5; 462A.38, subdivision 2; 462A.39, subdivision 2; 462A.395; 473.145; 473.3999; 473.4051, by adding a subdivision; 473.412, subdivisions 2, 3; 473.4465, subdivision 4; 477A.35, subdivisions 2, 4, 5, 6, by adding a subdivision; 477A.36, subdivisions 1, as amended, 4, 5, 6, as amended, by adding a subdivision; 609.67, subdivision 1; Laws 2020, chapter 73, section 8; Laws 2021, First Special Session chapter 5, article 1, section 2, subdivision 2; Laws 2021, First Special Session chapter 7, article 13, section 68; article 17, section 19, as amended; Laws 2022, chapter 42, section 2; Laws 2023, chapter 22, section 4, subdivision 2; Laws 2023, chapter 37, article 1, section 2, subdivisions 2, 5, 18, 25, 29, 32; article 2, sections 6, subdivisions 1, 2, 4, 5, by adding subdivisions; 12, subdivision 2; Laws 2023, chapter 41, article 1, sections 2, subdivisions 35, 36, 49, as amended; 4, subdivision 2; Laws 2023, chapter 43, article 1, sections 2; 4; article 2, section 142, subdivision 9; Laws 2023, chapter 52, article 19, section 120; Laws 2023, chapter 53, article 14, section 1; article 19, sections 2, subdivisions 1, 3, 5; 4; article 21, sections 6; 7;

Laws 2023, chapter 57, article 1, section 6; Laws 2023, chapter 60, article 10, section 2, subdivision 2; Laws 2023, chapter 61, article 1, sections 60, subdivisions 1, 2; 67, subdivision 3; article 4, section 11; article 8, sections 1; 2; 3; 8; article 9, section 2, subdivisions 5, 14, 16, as amended, 18; Laws 2023, chapter 68, article 1, sections 3, subdivision 2; 4, subdivision 3; 20; article 4, sections 108; 126; Laws 2023, chapter 70, article 1, section 35; article 20, sections 2, subdivisions 5, 29, 31; 3, subdivision 2; 12, as amended; Laws 2024, chapter 79, article 1, sections 18; 23; 24; 25, subdivision 3; article 10, sections 1; 6; Laws 2024, chapter 80, article 2, sections 6, subdivisions 2, 3, by adding subdivisions; 10, subdivision 1; Laws 2024, chapter 113, section 1, subdivision 2; 2024 H.F. No. 5237, article 22, section 2, subdivisions 4, if enacted, 5, if enacted; proposing coding for new law in Minnesota Statutes, chapters 16A; 16B; 62A; 62C; 62D; 62J; 62M; 62Q; 135A; 136A; 137; 144; 144A; 144E; 144G; 145D; 148; 148B; 148E; 149A; 150A; 151; 156; 161; 168; 169; 181; 214; 216C; 216G; 219; 245C; 246C; 254B; 256; 256B; 256S; 268B; 282; 325F; 326B; 341; 346; 430; 462A; proposing coding for new law as Minnesota Statutes, chapters 181C; 216I; repealing Minnesota Statutes 2022, sections 3.7371, subdivision 7; 34.07; 62A.041, subdivision 3; 135A.16; 144.218, subdivision 3; 144.497; 144E.001, subdivision 5; 144E.01; 144E.123, subdivision 5; 144E.27, subdivisions 1, 1a; 144E.50, subdivision 3; 147A.09, subdivision 5; 148D.061, subdivision 9; 151.74, subdivision 16; 156.12, subdivision 6; 168.1297; 179.81; 179.82; 179.83, subdivision 1; 179.84, subdivision 1; 179.85; 216E.001; 216E.01, subdivisions 1, 2, 3, 4, 5, 7, 8, 9, 10; 216E.02; 216E.021; 216E.03, subdivisions 2, 3a, 3b, 4, 9; 216E.04, subdivisions 1, 3, 4, 5, 6, 7, 8, 9; 216E.05, subdivisions 1, 3; 216E.08, subdivisions 1, 4; 216E.18, subdivisions 1, 2; 216F.01; 216F.011; 216F.012; 216F.015; 216F.02; 216F.03; 216F.05; 216F.06; 216F.07; 216F.08; 216F.081; 245C.125; 246.41; 252.27, subdivisions 1a, 2, 3, 4a, 5, 6; 253C.01; 256.043, subdivision 4; 256B.0916, subdivision 10; 256B.79, subdivision 6; 256D.19, subdivisions 1, 2; 256D.20, subdivisions 1, 2, 3, 4; 256D.23, subdivisions 1, 2, 3; 256R.02, subdivision 46; 462A.209, subdivision 8; Minnesota Statutes 2023 Supplement, sections 3.855, subdivision 5; 62J.312, subdivision 6; 62Q.522, subdivisions 3, 4; 135A.162, subdivision 7; 216E.01, subdivisions 3a, 6, 9a; 216E.03, subdivisions 1, 3, 5, 6, 7, 10, 11; 216E.04, subdivision 2; 216E.05, subdivision 2; 216F.04; 245C.08, subdivision 2; 246C.03; 252.27, subdivision 2a; 268B.06, subdivision 7; 268B.08; 268B.10, subdivision 11; 268B.14, subdivision 5; 477A.35, subdivision 1; Laws 2023, chapter 25, section 190, subdivision 10; Laws 2023, chapter 37, article 2, section 13; Laws 2024, chapter 79, article 4, section 1, subdivision 3; Laws 2024, chapter 80, article 2, section 6, subdivision 4; Minnesota Rules, parts 1506.0010; 1506.0015; 1506.0020; 1506.0025; 1506.0030; 1506.0035; 1506.0040; 5520.0100; 5520.0110; 5520.0120, subparts 1, 2, 3, 4, 5, 6, 7; 5520.0200; 5520.0250, subparts 1, 2, 4; 5520.0300; 5520.0500, subparts 1, 2, 3, 4, 5, 6; 5520.0520; 5520.0540; 5520.0560; 5520.0600; 5520.0620; 5520.0700; 5520.0710; 5520.0800; 7850.1000; 7850.1100; 7850.1200; 7850.1300; 7850.1400; 7850.1500; 7850.1600; 7850.1700; 7850.1800; 7850.1900; 7850.2000; 7850.2100;

7850.2200; 7850.2300; 7850.2400; 7850.2500; 7850.2600; 7850.2700; 7850.2800;  
7850.2900; 7850.3000; 7850.3100; 7850.3200; 7850.3300; 7850.3400; 7850.3500;  
7850.3600; 7850.3700; 7850.3800; 7850.3900; 7850.4100; 7850.4200; 7850.4500;  
7850.4600; 7850.4700; 7850.4800; 7850.4900; 7850.5000; 7850.5100; 7850.5200;  
7850.5300; 7850.5400; 7850.5500; 7850.5600; 7854.0100; 7854.0200; 7854.0300;  
7854.0400; 7854.0500; 7854.0600; 7854.0700; 7854.0800; 7854.0900; 7854.1000;  
7854.1100; 7854.1200; 7854.1300; 7854.1400; 7854.1500.

7. In August 2025, this Court held that the 2024 Omnibus Bill violates the Single Subject Clause, and severed and struck down one provision of the Bill—Article 36, §2, relating to binary triggers. But in doing so, the Court warned that striking this single “portion alone will not bring the 2024 Omnibus Bill into constitutional compliance—not even close. Instead, that burden will be shifted to the people and businesses of Minnesota who will be forced to bring hundreds of lawsuits over the next few years before the statute of limitations expires to hack off, piece by piece, its many offending portions.” *MGOC*, No. 62-CV-25-1083, Doc. 63 at 24 (Minn. Dist. Ct. Aug. 18, 2025).

8. Plaintiff Minnesota Private Business Council (the “*Business Council*”), on behalf of its many members affected by the 2024 Omnibus Bill, now seeks invalidation of those portions of the Bill that affect their interests. Specifically, the Private Business Council seeks invalidation of the 2024 Omnibus Bill’s Article 10, which governs whether private businesses must classify people they hire as employees or independent contractors; Article 11, which creates and modifies requirements for private employers to offer “earned sick and safe time” to their employees; and Article 73, which creates and modifies requirements for private employers to offer paid leave to their employees.

9. These provisions are invalid under the Single Subject Clause because the 2024 Omnibus Bill lacks any valid single subject at all. Alternatively, these provisions are invalid under the Single

Subject Clause because they are not germane to any valid single subject the 2024 Omnibus Bill may have.

### **PARTIES**

10. Plaintiff Minnesota Private Business Council is a Minnesota non-profit corporation and is recognized by the IRS as a 501(c)(6) business league non-profit organization.

11. The Business Council's registered office and principal place of business is in Minnetonka, but its members reside and have their places of business across Minnesota.

12. The Business Council advocates on behalf of its members for policies that lead to job growth, new business creation and entrepreneurship, and broad-based well-being for Minnesota's workers and their families.

13. The Business Council is a "party" under Minn. Stat. §15.471, subd. 6(a)(2), because it is a nonprofit corporation whose annual revenues do not exceed \$7,000,000.

14. Defendant Tim Walz, named in his official capacity, is the Governor of Minnesota. He has constitutional responsibility for signing bills into law, and the constitutional duties of taking care that the laws be faithfully executed and of supporting the constitution of Minnesota. He purported to sign the 2024 Omnibus Bill into law.

15. Defendant Keith Ellison, named in his official capacity, is the Attorney General of the State of Minnesota. He has authority regarding certain provisions of the 2024 Omnibus Bill, including provisions of Article 10 related to employee/independent-contractor classification.

16. Defendant Nicole Blissenbach, named in her official capacity, is the Commissioner of the Minnesota Department of Labor and Industry. She has authority regarding certain provisions of the 2024 Omnibus Bill, including provisions of Articles 10, 11, and 73 related to earned sick and

safe time for employees, to employee/independent-contractor classification, to registration by construction contractors, and to paid leave for employees.

17. Defendant Matt Varilek, named in his official capacity, is the Commissioner of the Minnesota Department of Employment and Economic Development. He has authority regarding certain provisions of the 2024 Omnibus Bill, including provisions of Articles 10 and 73 related to employee/independent-contractor classification and paid leave for employees.

18. Defendant Grace Arnold, named in her official capacity, is the Commissioner of the Minnesota Department of Commerce. She has authority regarding certain provisions of the 2024 Omnibus Bill, including provisions of Articles 10 and 73 related to employee/independent-contractor classification and paid leave for employees.

19. Defendant Paul Marquart, named in his official capacity, is the Commissioner of the Minnesota Department of Revenue. He has authority regarding certain provisions of the 2024 Omnibus Bill, including provisions of Article 10 related to employee/independent-contractor classification.

### **JURISDICTION AND VENUE**

20. This Court has subject-matter jurisdiction over this action for declaratory relief under Article IV, §17 of the Minnesota Constitution pursuant to the Minnesota Uniform Declaratory Judgments Act. Minn. Stat. §555.01, *et seq.*

21. The Court has personal jurisdiction over the defendants because they are domiciled in the State of Minnesota and all facts relevant to this action occurred in Minnesota.

22. Venue is proper in Ramsey County District Court because the defendants reside in this County, and the facts giving rise to the cause of action occurred here. Minn. Stat. §§542.09; 542.03.

## ALLEGATIONS

### **I. Background**

23. The last day for the Minnesota legislature to pass bills in its 2024 session was May 19, 2024.

24. At 9:44 p.m. on that day, House File 5247 was a tax omnibus bill of roughly 40 pages in length whose title began, “A bill for an act relating to taxation...”

25. Over the next ten minutes, the bill would experience a metamorphosis.

26. Around 9:45 PM on that day, the legislature’s Tax Omnibus Conference Committee, in a meeting that lasted nine minutes, passed an amendment that folded eight other omnibus bills into what was previously the tax omnibus bill. H.F. 5247 (“CCR-HF5247”) now contained omnibus bills on the following subjects: health, higher education, firearms, energy and agriculture, human services, health and human services, and paid leave. Its contents spanned more than 1,400 pages.

27. Tucked at the very end of CCR-HF5247—after the last section of the last article—were the words “Delete the title and insert: ‘A bill for an act relating to the operation and financing of state government...’” followed by the rest of the hundreds-of-lines-long title reprinted in full above.<sup>3</sup>

28. The House took up CCR-HF5247 a short time later, and voted amidst an uproar to adopt the conference committee’s recommended changes and passed the bill by a vote of 70 to 50 along party lines (with 13 representatives not voting) sometime around 11:14 PM.<sup>4</sup>

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<sup>3</sup> Available at [https://www.revisor.mn.gov/bills/text.php?number=HF5247&version=0&session=ls93&session\\_year=2024&session\\_number=0&type=ccr](https://www.revisor.mn.gov/bills/text.php?number=HF5247&version=0&session=ls93&session_year=2024&session_number=0&type=ccr) (beginning at line 1425.30).

<sup>4</sup> Minn. H., Floor Debate, 93rd Minn. Leg., Reg. Sess. (May 19, 2024 at 21:34 CT) (video web media, part 5), <https://www.house.mn.gov/hjvid/93/898728> (beginning at 1:33:06).

29. The Senate then took up CCR-HF5247 around 11:36 PM, with less than 24 minutes left to pass legislation. Amidst an unintelligible din of senators shouting for recognition, the Senate adopted the conference committee’s recommended changes and passed the bill in a bare five or six minutes, around 11:42 PM,<sup>5</sup> by a single vote—34 to 14, along party lines, with 19 senators not voting).

30. On May 24, 2024, Governor Walz signed the 2024 Omnibus Bill.

31. The contents of the 2024 Omnibus Bill, post-metamorphosis, can be broken down as follows:

- a. Transportation, Housing, and Labor Omnibus, H.F. 5242 (CCR-HF5242A),<sup>6</sup> as Articles 1-17;
- b. Health Omnibus, H.F. 4247 (CCR-HF4247A),<sup>7</sup> as Articles 18-33;
- c. Higher Education Omnibus, H.F. 4024 (CCR-HF4024),<sup>8</sup> as Articles 34-35;
- d. Firearms Provisions, H.F. 2609 (CCR-HF2609),<sup>9</sup> as Article 36;
- e. Energy and Agriculture Omnibus, S.F. 4942 (CCR-SF4942),<sup>10</sup> as Articles 37-45;

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<sup>5</sup> Minn. Sen., Floor Debate, 93rd Minn. Leg., Reg. Sess. (May 19, 2024 at 09:00 CT) (video web media, part 3), [https://mnsenate.granicus.com/player/clip/12609?view\\_id=5&redirect=true](https://mnsenate.granicus.com/player/clip/12609?view_id=5&redirect=true) (beginning at 2:27:55).

<sup>6</sup> Available at [https://www.revisor.mn.gov/bills/text.php?number=HF5242&type=ccr&version=A&session=ls93&session\\_year=2024&session\\_number=0](https://www.revisor.mn.gov/bills/text.php?number=HF5242&type=ccr&version=A&session=ls93&session_year=2024&session_number=0).

<sup>7</sup> Available at [https://www.revisor.mn.gov/bills/text.php?number=HF4247&type=ccr&version=A&session=ls93&session\\_year=2024&session\\_number=0](https://www.revisor.mn.gov/bills/text.php?number=HF4247&type=ccr&version=A&session=ls93&session_year=2024&session_number=0).

<sup>8</sup> Available at [https://www.revisor.mn.gov/bills/text.php?number=HF4024&version=0&session=ls93&session\\_year=2024&session\\_number=0&type=ccr](https://www.revisor.mn.gov/bills/text.php?number=HF4024&version=0&session=ls93&session_year=2024&session_number=0&type=ccr).

<sup>9</sup> Available at [https://www.revisor.mn.gov/bills/text.php?number=HF2609&type=ccr&version=0&session=ls93&session\\_year=2023&session\\_number=0](https://www.revisor.mn.gov/bills/text.php?number=HF2609&type=ccr&version=0&session=ls93&session_year=2023&session_number=0).

<sup>10</sup> Available at [https://www.revisor.mn.gov/bills/text.php?number=SF4942&version=0&session=ls93&session\\_year=2024&session\\_number=0&type=ccr](https://www.revisor.mn.gov/bills/text.php?number=SF4942&version=0&session=ls93&session_year=2024&session_number=0&type=ccr).

- f. Human Services Omnibus, S.F. 5335 (CCR-SF5335),<sup>11</sup> Articles 46-53;
- g. Health and Human Services Omnibus, S.F. 4699 (CCR-SF4699),<sup>12</sup> as Articles 54-67;
- h. Tax Omnibus, H.F. 5247 (CCR-HF5247),<sup>13</sup> as Articles 68-72; and
- i. Paid Leave Omnibus, H.F. 5363 (4th Engrossment),<sup>14</sup> as Article 73.

32. Even these names do not identify all of the many subjects covered by the Omnibus Bill. For instance, the Bill’s regulation of combative sports is not covered by any of these names.

## II. The 2024 Omnibus Bill Violates the Single Subject Clause.

33. Article IV, section 17 of the Minnesota Constitution states that “No law shall embrace more than one subject, which shall be expressed in its title.”

34. The Single Subject Clause was designed “to prevent what is called ‘logrolling legislation’ or ‘omnibus bills,’ by which a number of different and disconnected subjects are united in one bill, and then carried through by a combination of interests.” *Johnson v. Harrison*, 50 N.W. 923, 924 (Minn. 1891).

35. The Single Subject Clause’s purpose is “to secure to every distinct measure of legislation a separate consideration and decision, dependent solely upon its individual merits.” *State v. Cassidy*, 22 Minn. 312, 322 (1875).

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<sup>11</sup> Available at [https://www.revisor.mn.gov/bills/text.php?number=SF5335&version=0&session=ls93&session\\_year=2024&session\\_number=0&type=ccr](https://www.revisor.mn.gov/bills/text.php?number=SF5335&version=0&session=ls93&session_year=2024&session_number=0&type=ccr).

<sup>12</sup> Available at [https://www.revisor.mn.gov/bills/text.php?number=SF4699&version=0&session=ls93&session\\_year=2024&session\\_number=0&type=ccr](https://www.revisor.mn.gov/bills/text.php?number=SF4699&version=0&session=ls93&session_year=2024&session_number=0&type=ccr).

<sup>13</sup> Available at [https://www.revisor.mn.gov/bills/text.php?number=HF5247&version=0&session=ls93&session\\_year=2024&session\\_number=0&type=ccr](https://www.revisor.mn.gov/bills/text.php?number=HF5247&version=0&session=ls93&session_year=2024&session_number=0&type=ccr).

<sup>14</sup> Available at [https://www.revisor.mn.gov/bills/text.php?number=HF5363&version=4&session=ls93&session\\_year=2024&session\\_number=0](https://www.revisor.mn.gov/bills/text.php?number=HF5363&version=4&session=ls93&session_year=2024&session_number=0).

36. All of the nine original omnibus bills that were combined into the 2024 Omnibus Bill addressed their own separate general subjects, as expressed in their respective titles:<sup>15</sup>

- a. Transportation, Housing, and Labor Omnibus, H.F. 5242 (CCR-HF5242A): “relating to state government;”<sup>16</sup>
- b. Health Omnibus, H.F. 4247 (CCR-HF4247A): “relating to health;”<sup>17</sup>
- c. Higher Education Omnibus, H.F. 4024 (CCR-HF4024): “relating to higher education;”<sup>18</sup>
- d. Firearms Provisions, H.F. 2609 (CCR-HF2609): “relating to public safety;”<sup>19</sup>
- e. Energy and Agriculture Omnibus, S.F. 4942 (CCR-SF4942): “relating to state government;”<sup>20</sup>
- f. Human Services Omnibus, S.F. 5335 (CCR-SF5335): “relating to human services;”<sup>21</sup>
- g. Health and Human Services Omnibus, S.F. 4699 (CCR-SF4699): “relating to state government;”<sup>22</sup>

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<sup>15</sup> The general subjects listed are from the versions of the bills incorporated into the 2024 Omnibus Bill.

<sup>16</sup> Available at [https://www.revisor.mn.gov/bills/text.php?number=HF5242&type=ccr&version=A&session=ls93&session\\_year=2024&session\\_number=0](https://www.revisor.mn.gov/bills/text.php?number=HF5242&type=ccr&version=A&session=ls93&session_year=2024&session_number=0). As introduced, the texts of both the House and Senate files had the general subject “relating to transportation.”

<sup>17</sup> Available at [https://www.revisor.mn.gov/bills/text.php?number=HF4247&type=ccr&version=A&session=ls93&session\\_year=2024&session\\_number=0](https://www.revisor.mn.gov/bills/text.php?number=HF4247&type=ccr&version=A&session=ls93&session_year=2024&session_number=0).

<sup>18</sup> Available at [https://www.revisor.mn.gov/bills/text.php?number=HF4024&version=0&session=ls93&session\\_year=2024&session\\_number=0&type=ccr](https://www.revisor.mn.gov/bills/text.php?number=HF4024&version=0&session=ls93&session_year=2024&session_number=0&type=ccr).

<sup>19</sup> Available at [https://www.revisor.mn.gov/bills/text.php?number=HF2609&type=ccr&version=0&session=ls93&session\\_year=2023&session\\_number=0](https://www.revisor.mn.gov/bills/text.php?number=HF2609&type=ccr&version=0&session=ls93&session_year=2023&session_number=0).

<sup>20</sup> Available at [https://www.revisor.mn.gov/bills/text.php?number=SF4942&version=0&session=ls93&session\\_year=2024&session\\_number=0&type=ccr](https://www.revisor.mn.gov/bills/text.php?number=SF4942&version=0&session=ls93&session_year=2024&session_number=0&type=ccr).

<sup>21</sup> Available at [https://www.revisor.mn.gov/bills/text.php?number=SF5335&version=0&session=ls93&session\\_year=2024&session\\_number=0&type=ccr](https://www.revisor.mn.gov/bills/text.php?number=SF5335&version=0&session=ls93&session_year=2024&session_number=0&type=ccr).

<sup>22</sup> Available at [https://www.revisor.mn.gov/bills/text.php?number=SF4699&version=0&session=ls93&session\\_year=2024&session\\_number=0&type=ccr](https://www.revisor.mn.gov/bills/text.php?number=SF4699&version=0&session=ls93&session_year=2024&session_number=0&type=ccr). As introduced, the texts of both the House and Senate files had the general subject “relating to health.”

- h. Tax Omnibus, H.F. 5247 (CCR-HF5247): “relating to taxation;”<sup>23</sup>
- i. Paid Leave Omnibus, H.F. 5363 (4th Engrossment): “relating to employees.”<sup>24</sup>

37. All told, the 2024 Omnibus Bill encompasses at least thirteen subjects: transportation (Articles 1-3, 17), labor (Articles 4, 6, 8-11, 73), combative sports (Article 5), state employees (Articles 12 and 72), housing (Articles 14-16), health occupations and licensing (Articles 18-33, 61, 65), higher education (Articles 34-35), firearms (Article 36), agriculture (Article 37-38), energy (Articles 13, 39-45, 58), human services (Articles 46-55, 62-64, 66-67), healthcare (Articles 56-57, 59-60), and taxes (Articles 68-71).

38. The general subjects of the nine original omnibus bills and the other subjects contained in the 2024 Omnibus Bill are not “‘so connected or related to each other’ that they are all ‘parts of, or germane to’” any one general subject. *Otto v. Wright Cnty.*, 910 N.W.2d 446, 456 (Minn. 2018) (quoting *Townsend v. State*, 767 N.W.2d 11, 13 (Minn. 2009)). Indeed, there is no permissible single subject that embraces a predominant part, or even a bare majority, of the provisions of the 2024 Omnibus Bill.

39. The myriad subjects listed in the amended title of the 2024 Omnibus Bill similarly lack any connection that could make them all germane to any one general subject. Indeed, there is no permissible single subject that embraces a predominant part, or even a bare majority, of the topics listed in the title of the 2024 Omnibus Bill.

40. Even the first phrase of the Bill’s title—“the operation and financing of state government”—does not identify any valid single subject for the bill, because the rest of the Bill’s

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<sup>23</sup> Available at [https://www.revisor.mn.gov/bills/text.php?number=HF5247&version=0&session=ls93&session\\_year=2024&session\\_number=0&type=ccr](https://www.revisor.mn.gov/bills/text.php?number=HF5247&version=0&session=ls93&session_year=2024&session_number=0&type=ccr).

<sup>24</sup> Available at [https://www.revisor.mn.gov/bills/text.php?number=HF5363&version=4&session=ls93&session\\_year=2024&session\\_number=0](https://www.revisor.mn.gov/bills/text.php?number=HF5363&version=4&session=ls93&session_year=2024&session_number=0).

title lists many topics that are not germane to the operation and financing of state government; and because even when this phrase is considered alone, it lists two subjects, not one, and is unconstitutionally overbroad under the Single Subject Clause.

41. Therefore, the 2024 Omnibus Bill lacks any single subject or common theme, and each and all of its provisions are invalid under the Single Subject Clause.

42. In the alternative, if the 2024 Omnibus Bill's subject is "the operation and financing of state government" or any other conceivable common theme, Articles 10, 11, and 73 of the Bill are not germane to that subject, and therefore are due to be severed from the Bill and struck down. Each of these Articles regulates the relationship between private, non-government employers and their employees or contractors. None of them can permissibly be regarded as addressing "the operation and financing of state government." Indeed, they have no greater relationship to government finance or operations than would most other regulations of commerce or relationships between private citizens.

### **III. The 2024 Omnibus Bill Harms the Business Council's Members.**

43. Articles 10, 11, and 73 of the 2024 Omnibus Bill govern the paid-leave, sick-and-safe-time, and classification obligations of almost every business in Minnesota that has employees or that hires independent contractors, as well as almost every business that provides or performs building construction or improvement services in Minnesota.

44. The Business Council has many members that have employees in Minnesota.

45. The Business Council has many members that hire independent contractors in Minnesota.

46. The Business Council has members that provide or perform building construction or improvement services in Minnesota.

47. Thus, the Business Council has members that are governed by each of Articles 10, 11,

and 73 of the 2024 Omnibus Bill.

**CLAIM FOR RELIEF**

**Violation of the Minnesota Constitution's Single Subject Clause  
(Minn. Stat. §555.01, *et seq.*; Minn. Const. art. IV, sec. 17)**

48. Plaintiff incorporates by reference each of the above allegations.

49. Article IV, section 17 of the Minnesota Constitution requires that “No law shall embrace more than one subject, which shall be expressed in its title.”

50. Both the 2024 Omnibus Bill and its title lack any permissible common theme or single subject, and therefore each and all of the Bill’s provisions are invalid.

51. In the alternative, Articles 10, 11, and 73 of the 2024 Omnibus Bill are not germane to any permissible single subject that the 2024 Omnibus Bill or its title may have.

**PRAYER FOR RELIEF**

WHEREFORE, Plaintiff requests relief as follows:

- A. A judgment declaring the 2024 Omnibus Bill unconstitutional in full and enjoining the enforcement of any provision of it;
- B. Alternatively, a judgment declaring that Articles 10, 11, and 73 of the 2024 Omnibus Bill are invalid, and enjoining their enforcement;
- C. An award of taxable costs and disbursements;
- D. An award of costs, upon proper application for the same, as may seem equitable and just under Minn. Stat. §555.10;
- E. An award of attorney fees under the Minnesota Equal Access to Justice Act, Minn. Stat. §15.471, *et seq.*; and
- F. Such other and further relief as this Court deems just and proper.

Dated: March 23, 2026

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**ACKNOWLEDGMENT**

The undersigned acknowledges that sanctions may be imposed pursuant to Minn. Stat. §549.211, subd. 3.

Dated: March 23, 2026

/s/ Nicholas J. Nelson  
Nicholas J. Nelson (#391984)