

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF HENNEPIN

FOURTH JUDICIAL DISTRICT

Ronald Peterson; John Tschohl; Laverne
Turner; Mary Holmberg,

File No.: 27-CV-26-4118
Case Type: Civil Other / Misc.
Assigned to: Judge Laura M. Thomas

Petitioners,

**ALTERNATIVE WRIT OF
MANDAMUS**

vs.

Jacob Frey, in his official capacity as Mayor
of Minneapolis,

Respondent.

**THE STATE OF MINNESOTA TO: THE ABOVE-NAMED RESPONDENT AND HIS
COUNSEL:**

WHEREAS, the Petition for Writ of Mandamus and supporting affidavits filed with this Court on March 16, 2026, is incorporated by reference. As is the Answer filed by Respondent on April 27, 2026;

WHEREAS, Petitioners' Petition, Petitioners' Related Affidavits, and Respondent's Answer demonstrate that Petitioners have satisfied each of the three elements for mandamus under Minn. Stat. §§ 586.01 and .02, including as the elements have been construed by the Minnesota Supreme Court in *N. States Power Co. v. Minn. Metro. Council*, 684 N.W.2d 485, 491 (Minn. 2004);

WHEREAS, Petitioners' Petition, Petitioners' Related Affidavits, and Respondent's Answer demonstrate that Respondent has violated and continues to violate his duty in Section 7.3(c) of the Minneapolis City Charter to employ a police force of at least 0.0017 employees per resident of Minneapolis;

WHEREAS, Petitioners' filings demonstrate that they have "suffered a public wrong specifically injurious to" them due to Respondent's current and ongoing violation of the duty to them;

WHEREAS, Petitioners' Petition, Petitioners' Related Affidavits, and Respondent's Answer demonstrate that besides the immediate and strict compulsory mandamus relief under Minn. Stat. §§ 586.01 and .02, they have no other "plain, speedy and adequate remedy in the ordinary course of law," as required by Minn. Stat. § 586.02;

THEREFORE, Respondent is hereby commanded, after the receipt of this Alternative Writ of

Mandamus, to comply with section 7.3(c) of the Minneapolis City Charter by no later than **Monday, January 4, 2027**, and file proof of such performance to avoid a trial in this matter.

Should nonperformance continue Respondent shall show cause before this Court, at a trial to be held on **Monday, April 26, 2027**, or on a date that is mutually agreeable to the parties, to show cause (state your reasons, if any) as to why the Court should not issue a Peremptory Writ and find you in contempt of court for failing to comply with section 7.3(c) of the Minneapolis City Charter.

Should nonperformance continue, Respondent and/or Respondent's legal counsel shall attend all scheduled court appearances. The next appearance shall occur at the Court's Case Management Conference on **August 11, 2026, at 10:30 AM**, via Zoom, using the following information to access the hearing:

Zoom Meeting ID: 161 537 0595

Zoom Passcode: 1785

Respondent may either answer this Alternative Writ within thirty (30) days of its service upon him, or Respondent may stand on his prior pleading. Minn. Stat. § 586.06. In either case, the matter shall be "tried, and further proceedings had, in the same manner as in a civil action" as required under Minn. Stat. § 586.08.

Service by Petitioners upon Respondent shall be by personal service within five (5) days of the execution of this Alternative Writ of Mandamus.

WITNESS the Honorable Laura M. Thomas, Judge of said Court, and the seal thereof,
This 25th day of June 2026.

Dated: June 25, 2026

DISTRICT COURT ADMINISTRATOR

By: _____

Clerk of District Court