

**UNITED STATES COURT OF APPEALS
FOR THE EIGHTH CIRCUIT**

JOSEPH KIRCHNER,
Plaintiff-Appellant,
v.

KEITH ELLISON, in his official
capacity as Attorney General of the
State of Minnesota,
Defendant-Appellee.

No. 26-1615

**ADDENDUM TO
APPELLANT'S OPENING
BRIEF**

ADDENDUM TO APPELLANT'S OPENING BRIEF

Pursuant to Eighth Circuit Rule 28A(g), this addendum contains (1) the district court order from which the appeal is taken, and (2) record excerpts not to exceed fifteen additional pages, consisting of the three severability provisions, the structural explanation and memoranda framework, and the proportionality justification from the Amended Complaint (ECF No. 26), as well as excerpts from the word-limit request (ECF No. 24).

A. ORDER OF DISMISSAL

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

JOSEPH KIRCHNER,

Case No. 26-CV-0726 (PJS/ECW)

Plaintiff,

v.

ORDER

KEITH ELLISON, in his official capacity
Attorney General of the State of Minnesota,

Defendant.

Plaintiff Joseph Kirchner commenced this action by filing a 105-page “petition for declaratory and injunctive relief” — along with nearly 150 pages of attached exhibits — against defendant Keith Ellison, the Attorney General of the State of Minnesota. ECF No. 1. Kirchner’s original complaint sought wide-ranging and disparate forms of relief, including limits on federal agents’ use of force and other rules governing such agents’ conduct in this State; the return of children who were transported by immigration officials out of Minnesota; a declaration that the Supreme Court’s practice of staying preliminary injunctions exceeds their jurisdiction; a declaration that the doctrine of qualified immunity is illegitimate; and a permanent injunction preventing Ellison from enforcing Minn. Stat. § 626.89, which sets forth the procedures for disciplining peace officers. ECF No. 1 at 97–103.

Ellison moved to dismiss, ECF No. 19, and Kirchner then filed an amended complaint, ECF No. 26. *See* Fed. R. Civ. P. 15(a)(1)(B) (permitting a party to amend its pleading once as a matter of course within 21 days after service of a motion under Fed. R. Civ. P. 12(b)). The amended complaint is 120 pages with nearly 500 pages of attachments. ECF No. 26. Once again, Kirchner seeks wide-ranging and disparate forms of relief, including relief against Ellison for purportedly misstating the law and declaratory relief concerning the Supreme Court's use of interlocutory orders, the legality of qualified immunity, and similar broad statements of law. ECF No. 26 at 95–107. Kirchner also seeks criminal referrals. *Id.* at 107.

This case is an obvious abuse of the Court's already strained resources. Ellison (an employee of the *State*) is obviously not a proper defendant for much of the relief that Kirchner seeks (such as declarations about the powers of *federal* officials), Kirchner obviously lacks standing to seek virtually all of the relief he requests, the Court does not have the power to simply make declarations about broad legal precepts absent an Article III case or controversy, and (to take one of many examples) a federal district court cannot issue relief that binds the Supreme Court.

Among the many problems with Kirchner's amended complaint (as well as his original complaint), the most obvious is that it violates Rule 8(a)(2) of the Federal Rules of Civil Procedure, which requires that a pleading contain "a short and plain statement

of the claim showing that the pleader is entitled to relief.” As Kirchner has already had this pointed out to him in Ellison’s motion to dismiss, and as Kirchner responded by submitting a pleading that even more egregiously violates Rule 8(a)(2), the Court will dismiss his amended complaint.

ORDER

Based on the foregoing, and on all of the files, records, and proceedings herein,
IT IS HEREBY ORDERED THAT:

1. The amended complaint [ECF No. 26] is DISMISSED.
2. All pending motions are DENIED AS MOOT.
3. Plaintiff is warned that, should he file additional frivolous complaints or other papers, he may be subject to sanctions, including a filing restriction.

LET JUDGMENT BE ENTERED ACCORDINGLY.

Dated: March 30, 2026

/s/ Patrick J. Schiltz
Patrick J. Schiltz, Chief Judge
United States District Court

B. FIRST SEVERABILITY PROVISION

Amended Complaint (ECF No. 26), Paragraph 54 — appearing at the conclusion of Section IV (Causes of Action Summary Table), immediately before the primary Chapter 8 claims:

54. Each cause of action concerns Defendant's own conduct. Complete relief is available against Defendant alone. The severability provision in the Prayer for Relief (Section XI.E) confirms that state claims stand independently.

C. SECOND SEVERABILITY PROVISION

Amended Complaint (ECF No. 26), Paragraph 208 — appearing at the conclusion of Section X (Causes of Action), Subsection G ("No Federal Party Required"):

208. Each cause of action concerns Defendant's own conduct. Complete relief is available against Defendant alone. The Court can declare what Minnesota law requires, order correction of false statements, and enjoin continued selective enforcement — all without any federal party. The severability provision in Section XI.E confirms that state claims stand independently.

D. THIRD SEVERABILITY PROVISION AND BOND STANDING

Amended Complaint (ECF No. 26), Section XI.E — "Severability and *Bond Standing*" (Paragraphs 255-261):

255. **Severability:** Plaintiff requests that the Court treat each item of relief as severable. If the Court determines it lacks jurisdiction to grant certain relief — particularly relief directed at federal conduct — Plaintiff requests that the Court proceed with relief against Defendant on the state law claims, which stand independently. The state claims (Minnesota Statute § 626.89, Chapter 8 statutory duties, First

Amendment petition violation, Equal Protection selective enforcement) require no federal party and are fully justiciable against Defendant alone.

256. Severability Cannot Exile Claims to Political Process:

However, severability cannot be used to relegate the § 2101(f) and *Harlow* claims to political-process-only status. *Bond* specifically protects the citizen's ability to seek judicial vindication of structural constitutional principles "without having to rely solely upon the political processes that control a remote central power." 564 U.S. at 221 (quoting *Gregory v. Ashcroft*, 501 U.S. 452, 458 (1991)).... If this Court concludes it cannot declare what § 2101(f) means or what the Constitution requires for immunity expansion — and the D.C. court cannot, and the Florida court cannot, because SCOTUS can never be a party anywhere — then the citizen has no judicial avenue.... If severability means "pursue these claims through Congress," then severability violates *Bond*.

257. *Bond v. United States* Standing for Separation of Powers

Claims: Plaintiff asserts standing under *Bond v. United States*, 564 U.S. 211 (2011), to challenge separation of powers violations — specifically, the Supreme Court's practice of exceeding statutory jurisdiction under 28 U.S.C. § 2101(f) and creating immunity doctrine without constitutional amendment (*Harlow v. Fitzgerald*). *Bond* held unanimously that individuals may challenge structural constitutional violations when government acts "in excess of its lawful powers." 564 U.S. at 221-22.

258. The Enforcement Void Justifies Citizen Standing: *Bond*

established that "fidelity to principles of federalism is not for the States alone to vindicate." *Id.* at 222. When Congress will not enforce § 2101(f), when the Executive benefits from SCOTUS exceeding that limit, and when state attorneys general abdicate their Chapter 8 duties — the citizen inherits the right to seek judicial declaration of what the law requires.

259. The declaratory relief sought is ordinary judicial function.

Plaintiff does not ask this Court to overrule or enjoin the Supreme Court. Plaintiff asks this Court to declare what statutes and constitutional provisions mean — the same function state courts

perform daily when interpreting the Fourth Amendment, § 1983, and the Fourteenth Amendment.

260. **Concrete Injury:** Plaintiff's injury is concrete: the Supreme Court's § 2101(f) violations enabled the federal enforcement operations that killed two Minnesota citizens; those operations simultaneously targeted Plaintiff's communications while gathering evidence for this litigation; and the Attorney General's Chapter 8 abdication — enabled by the same immunity structure — denied Plaintiff's criminal referral through a false statement of law. The chain from judicial overreach to executive impunity to state abdication to bodies in Minneapolis is direct and documented.

261. ***Bond's Unexplored Potential:*** *Bond v. United States* was decided 9-0 in 2011. Its holding that individuals may challenge structural constitutional violations when government fails has not been fully tested. Plaintiff submits that *Bond* provides the framework for citizen enforcement of separation of powers principles when all three branches fail — and that this Court has both the jurisdiction and the duty to declare that congressional limits on judicial power exist and are cognizable.

E. STRUCTURAL INDEPENDENCE OF STATE CLAIMS

Amended Complaint (ECF No. 26), Section VII Introduction — the Amended

Complaint explicitly told the district court that the federal context sections were structurally separate from the independently viable state claims:

The primary claims against Defendant Ellison (Sections V and VI) stand independently and require no federal party. This section establishes the federal context that makes the AG's Chapter 8 abdication not merely an administrative failure but a contributing cause of lethal harm. The detailed legal analysis supporting each subsection is set forth in the accompanying Memoranda of Law (Memos A through C [as filed]) and is incorporated by reference.

F. MEMORANDA FRAMEWORK: COMPREHENSIVE ANALYSIS REDUCES TO CORE QUESTIONS

Amended Complaint (ECF No. 26), Paragraph 269 — demonstrating that the comprehensive analysis underlying the broader claims was designed to reduce to dispositive questions, not to overwhelm:

269. The Standing Question Reduces to Two Dispositive Inquiries: Despite the thorough historical analysis of Law versus Equity and Standing Doctrine in the Florida memoranda, the comprehensive framework rests on two propositions. First, equitable standing exists for enumerated constitutional violations. *Cook v. United States*, 288 U.S. 102, 118-19 (1933), distinguishes law — requiring particularized injury — from equity — permitting standing for constitutional enforcement without the same injury requirements. Second, constitutional text must be interpreted consistently across all provisions. Madison's textual consistency principle holds that words "chosen with a studied discrimination" must yield the same interpretive result across all constitutional provisions; the same structural analysis that applies to one enumerated power applies to all. *See* Report on the Virginia Resolutions. Once *Cook* is accepted as authority for equitable standing and Madison's textual consistency principle is confirmed, the comprehensive historical analysis serves evidentiary purposes — demonstrating *why* the distinction existed, *how* the 1938 merger collapsed it without constitutional analysis, and *what* consequences follow. The legal question is simple: equity historically permitted standing for constitutional enforcement that law did not, and the Constitution must be interpreted consistently.

G. PROPORTIONALITY OF RELIEF

Amended Complaint (ECF No. 26), Paragraph 158:

158. The relief sought is proportional to the documented harm: declaratory judgment establishing the actual scope of Chapter 8 authority, correction of false statements maintained for over a decade, constitutional review of § 626.89 under the strict scrutiny that *Skeen v. State* requires, and legal relief restoring to Plaintiff the investigative

resources the Legislature guaranteed and Defendant denied through a false statement of law.

H. MEMORANDA DISCLAIMERS: DEPTH PROPORTIONAL TO DOCTRINAL SERIOUSNESS

The Amended Complaint consistently explained that the depth of each memorandum was proportional to the gravity of the constitutional doctrine being analyzed — and that each memorandum's analysis could be engaged or retired by addressing its core propositions. The district court's order did not acknowledge this structural feature.

Shadow Docket Analysis (ECF No. 26, ¶145):

145. The federal enforcement operations that killed two Minnesota citizens rest on a jurisdictional foundation that does not exist in law. The Supreme Court's shadow docket practice systematically violates 28 U.S.C. § 2101(f), which limits stays pending certiorari to "final judgment or decree" only. Since 2017, the Court has stayed preliminary injunctions — interlocutory orders explicitly excluded from the statute — across 80+ emergency applications, enabling executive immigration policies to survive judicial review through procedurally irregular certiorari.... The comprehensive analysis of this ultra vires practice is set forth in **Memo A** (134 applications analyzed, 1952-2026).

Qualified Immunity Analysis (ECF No. 26, ¶147):

147. The federal doctrine of qualified immunity, as established in *Harlow v. Fitzgerald*, 457 U.S. 800 (1982), shields the agents who killed Good and Pretti from civil liability. This doctrine violates eight constitutional provisions — Article I § 6, Article III, Article IV § 2, Article V, Article VI cl. 2, Amendment VII, Amendment IX, and Amendment XIV — by extending immunity beyond the sole constitutional source without the Article V amendment process. The

comprehensive analysis is set forth in **Memo B** (181 paragraphs documenting the eight violations) and **Appendix B** (Textual Analysis of Hedging Language in *Harlow*).

Public Trust / Civilian Oversight Analysis (ECF No. 26, ¶154):

154. The comprehensive public trust doctrine analysis — including the Madisonian framework, the UTC parallels, the settlor/trustee/beneficiary structure, the *Otto Bremer Trust* application, and the detailed civilian oversight proposal — is set forth in **Memo C**, §§ XV-XVI.

Section 626.89 Analysis (ECF No. 26, ¶139):

139. There is no rational distinction between peace officers and other public employees who exercise state authority over vulnerable populations. Peace officers, through unions such as the Police Officers Federation of Minnesota and Law Enforcement Labor Services, lobbied the Legislature for these exclusive protections. The comprehensive Article XII analysis is set forth in **Memo C**, §§ IV-VI, X.

Word Limit Request (ECF No. 24 — Letter to Chief Judge Schiltz, March 26, 2026):

"The Excess Is Proportional to the Scope. At approximately 16,300 countable words, the memorandum exceeds the limit by roughly 36%. This is a proportional overage for a filing that challenges the constitutional legitimacy of the single most consequential judicial doctrine in civil rights law — a doctrine that Justice Thomas has called resting on 'shaky ground,' *Baxter v. Bracey*, 140 S. Ct. 1862 (2020), and that four states have abolished within their jurisdictions."

"The Memorandum Has Been Reviewed for Redundancy. Plaintiff has systematically reviewed the memorandum for internal redundancy and consolidated or cross-referenced all duplicative content. The current length represents the minimum necessary to present eight independent constitutional arguments, each supported by authority, each connecting to the petition's causes of action, and each

independently capable of establishing that *Harlow* lacks constitutional foundation."

**I. FILING RECEIPTS — KIRCHNER V. ELLISON (D. MINN., FILED
MAY 12, 2026)**

As represented in Sections III.B (¶18) and VI(c) of the Opening Brief, Appellant has separately refiled the substantive Chapter 8 claims as a new action in the District of Minnesota. *Kirchner v. Ellison*, Civ. No. ____ (D. Minn.) (filed May 12, 2026). The District of Minnesota Clerk accepted the refiled action for filing on May 12, 2026. Case number assignment is pending as of the date of this submission, and Appellant will provide the assigned case number to this Court by separate notice promptly upon its assignment by the District Court.

The Clerk's filing-acceptance documents — stamped first pages of the complaint and the filing-fee receipt — are appended hereto solely to evidence the fact and date of filing, in support of Appellant's representations at ¶18 and ¶88(c) of the Opening Brief.

RECEIVED

MAY 12 2026

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA

CLERK, U.S. DISTRICT COURT
MINNEAPOLIS, MINNESOTA

JOSEPH KIRCHNER,

Plaintiff,

v.

KEITH ELLISON, in his official
capacity as Attorney General of the
State of Minnesota,

Defendant.

Case No. _____

**COMPLAINT FOR
DECLARATORY JUDGMENT
AND INJUNCTIVE RELIEF**

TABLE OF CONTENTS

I. INTRODUCTION.....	4
II. JURISDICTION AND VENUE	7
III. PARTIES	9
IV. FACTUAL ALLEGATIONS.....	9
A. The Criminal Referral.....	9
B. The False Denial Letter.....	10
C. The Website Disclaimer.....	10
D. Defendant's Congressional Testimony Six Days Later	12
E. The Statutory Framework Defendant Denied	14
F. The 50-State Comparison.....	23
G. The Feeding Our Future Meeting	26
H. Post-Denial Forensic Developments	27
I. The Legislature's 2026 Response Confirms the Disclaimer Has Misled a Coordinate Branch.....	30
J. Ongoing Harm and Costs of Redress.....	34
V. CLAIMS FOR RELIEF.....	35
A. Count I: First Amendment Retaliation and Petition Clause Violation (42 U.S.C. Section 1983).....	35
B. Count II: Equal Protection — Selective Enforcement (42 U.S.C. Section 1983)	37
C. Count III: Declaratory Relief — Section 8.31 Authority (28 U.S.C. Section 2201)...	38
D. Count IV: Declaratory Judgment — Ultra Vires Official Action (28 U.S.C. Section 2201).....	39
VI. PRAYER FOR RELIEF	41
VII. EXHIBIT INDEX	42

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS Joseph Kirchner (b) County of Residence of First Listed Plaintiff <u>Hennepin</u> (EXCEPT IN U.S. PLAINTIFF CASES) (c) Attorneys (Firm Name, Address, and Telephone Number) Joseph Kirchner, Pro Se 4440 Parklawn Avenue #203 Edina, MN 55435	DEFENDANTS KEITH ELLISON, in his official capacity as Attorney General of the State of Minnesota County of Residence of First Listed Defendant <u>Ramsey</u> (IN U.S. PLAINTIFF CASES ONLY) NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED. Attorneys (If Known) Matthew A. McGuire Assistant Attorney General Office of the Minnesota Attorney General
--	--

II. BASIS OF JURISDICTION (Place an "X" in One Box Only) ☐ 1 U.S. Government Plaintiff ☐ 2 U.S. Government Defendant ☒ 3 Federal Question (U.S. Government Not a Party) ☐ 4 Diversity (Indicate Citizenship of Parties in Item III)	III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant) <table style="width: 100%;"> <tr> <th></th> <th>PTF</th> <th>DEF</th> </tr> <tr> <td>Citizen of This State</td> <td>☐ 1</td> <td>☐ 1 Incorporated or Principal Place of Business In This State</td> </tr> <tr> <td>Citizen of Another State</td> <td>☐ 2</td> <td>☐ 2 Incorporated and Principal Place of Business In Another State</td> </tr> <tr> <td>Citizen or Subject of a Foreign Country</td> <td>☐ 3</td> <td>☐ 3 Foreign Nation</td> </tr> </table>		PTF	DEF	Citizen of This State	☐ 1	☐ 1 Incorporated or Principal Place of Business In This State	Citizen of Another State	☐ 2	☐ 2 Incorporated and Principal Place of Business In Another State	Citizen or Subject of a Foreign Country	☐ 3	☐ 3 Foreign Nation
	PTF	DEF											
Citizen of This State	☐ 1	☐ 1 Incorporated or Principal Place of Business In This State											
Citizen of Another State	☐ 2	☐ 2 Incorporated and Principal Place of Business In Another State											
Citizen or Subject of a Foreign Country	☐ 3	☐ 3 Foreign Nation											

IV. NATURE OF SUIT (Place an "X" in One Box Only)		Click here for: Nature of Suit Code Descriptions.	
CONTRACT ☐ 110 Insurance ☐ 120 Marine ☐ 130 Miller Act ☐ 140 Negotiable Instrument ☐ 150 Recovery of Overpayment & Enforcement of Judgment ☐ 151 Medicare Act ☐ 152 Recovery of Defaulted Student Loans (Excludes Veterans) ☐ 153 Recovery of Overpayment of Veteran's Benefits ☐ 160 Stockholders' Suits ☐ 190 Other Contract ☐ 195 Contract Product Liability ☐ 196 Franchise	TORTS PERSONAL INJURY ☐ 310 Airplane ☐ 315 Airplane Product Liability ☐ 320 Assault, Libel & Slander ☐ 330 Federal Employers' Liability ☐ 340 Marine ☐ 345 Marine Product Liability ☐ 350 Motor Vehicle ☐ 355 Motor Vehicle Product Liability ☐ 360 Other Personal Injury ☐ 362 Personal Injury - Medical Malpractice PERSONAL INJURY ☐ 365 Personal Injury - Product Liability ☐ 367 Health Care/Pharmaceutical Personal Injury Product Liability ☐ 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY ☐ 370 Other Fraud ☐ 371 Truth in Lending ☐ 380 Other Personal Property Damage ☐ 385 Property Damage Product Liability	FORFEITURE/PENALTY ☐ 625 Drug Related Seizure of Property 21 USC 881 ☐ 690 Other LABOR ☐ 710 Fair Labor Standards Act ☐ 720 Labor/Management Relations ☐ 740 Railway Labor Act ☐ 751 Family and Medical Leave Act ☐ 790 Other Labor Litigation ☐ 791 Employee Retirement Income Security Act IMMIGRATION ☐ 462 Naturalization Application ☐ 465 Other Immigration Actions	BANKRUPTCY ☐ 422 Appeal 28 USC 158 ☐ 423 Withdrawal 28 USC 157 INTELLECTUAL PROPERTY RIGHTS ☐ 820 Copyrights ☐ 830 Patent ☐ 835 Patent - Abbreviated New Drug Application ☐ 840 Trademark ☐ 880 Defend Trade Secrets Act of 2016 SOCIAL SECURITY ☐ 861 HIA (1395ff) ☐ 862 Black Lung (923) ☐ 863 DIWC/DIWW (405(g)) ☐ 864 SSID Title XVI ☐ 865 RSI (405(g)) FEDERAL TAX SUITS ☐ 870 Taxes (U.S. Plaintiff or Defendant) ☐ 871 IRS—Third Party 26 USC 7609
REAL PROPERTY ☐ 210 Land Condemnation ☐ 220 Foreclosure ☐ 230 Rent Lease & Ejectment ☐ 240 Torts to Land ☐ 245 Tort Product Liability ☐ 290 All Other Real Property	CIVIL RIGHTS ☒ 440 Other Civil Rights ☐ 441 Voting ☐ 442 Employment ☐ 443 Housing/Accommodations ☐ 445 Amer. w/Disabilities - Employment ☐ 446 Amer. w/Disabilities - Other ☐ 448 Education	PRISONER PETITIONS Habeas Corpus: ☐ 463 Alien Detainee ☐ 510 Motions to Vacate Sentence ☐ 530 General ☐ 535 Death Penalty Other: ☐ 540 Mandamus & Other ☐ 550 Civil Rights ☐ 555 Prison Condition ☐ 560 Civil Detainee - Conditions of Confinement	OTHER STATUTES ☐ 375 False Claims Act ☐ 376 Qui Tam (31 USC 3729(a)) ☐ 400 State Reapportionment ☐ 410 Antitrust ☐ 430 Banks and Banking ☐ 450 Commerce ☐ 460 Deportation ☐ 470 Racketeer Influenced and Corrupt Organizations ☐ 480 Consumer Credit (15 USC 1681 or 1692) ☐ 485 Telephone Consumer Protection Act ☐ 490 Cable/Sat TV ☐ 850 Securities/Commodities/Exchange ☐ 890 Other Statutory Actions ☐ 891 Agricultural Acts ☐ 893 Environmental Matters ☐ 895 Freedom of Information Act ☐ 896 Arbitration ☐ 899 Administrative Procedure Act/Review or Appeal of Agency Decision ☐ 990 Constitutionality of State Statutes

V. ORIGIN (Place an "X" in One Box Only)							
☒ 1 Original Proceeding	☐ 2 Removed from State Court	☐ 3 Remanded from Appellate Court	☐ 4 Reinstated or Reopened	☐ 5 Transferred from Another District (specify)	☐ 6 Multidistrict Litigation - Transfer	☐ 8 Multidistrict Litigation - Direct File	

VI. CAUSE OF ACTION Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity): 42 U.S.C. § 1983; 28 U.S.C. § 2201 Brief description of cause: Civil rights action for false denial of mandatory authority under Minn. Stat. Chapter 8; Equal Protection for Selective Enforcement, Declaratory Relief	CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P. ☐ DEMAND \$ Declaratory & Injunctive ☒ CHECK YES only if demanded in complaint: JURY DEMAND: ☐ Yes ☒ No
--	---

VII. REQUESTED IN COMPLAINT:	VIII. RELATED CASE(S) IF ANY (See instructions):
JUDGE <u>Hon. Patrick J. Schiltz</u> DOCKET NUMBER <u>0:26-cv-00726-PJS-ECW</u>	

DATE <u>May 12, 2026</u> SIGNATURE OF ATTORNEY OF RECORD <u>[Signature]</u>	RECEIPT # _____ AMOUNT _____ APPLYING IFP _____ JUDGE _____ MAG. JUDGE _____
--	--

RECEIVED

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA

MAY 12 2026

CLERK, U.S. DISTRICT COURT
MINNEAPOLIS, MINNESOTA

JOSEPH KIRCHNER,
Plaintiff,

v.

KEITH ELLISON, in his official
capacity as Attorney General of the
State of Minnesota,
Defendant.

Case No. _____

**INDEX OF PLAINTIFF'S
EXHIBITS**

INDEX

Pursuant to LR 7.1(1), the following exhibits are filed separately in support of the
Complaint for Declaratory and Injunctive Relief Under Minnesota Statutes Chapter 8:

Exhibit	Description
A	Attorney General Criminal Referral & Denial Letter
B	Multi-State AG Criminal Investigation Authority Comparison
C	Ellison-Walz Congressional Testimony (Mar. 4, 2026)
D	Ellison Feeding Our Future Audio Transcript (Dec. 11, 2021)
E	Attorney General Multi-Statute Authority Analysis — Consolidated Statutory and Historical-Chain Pack (sub-exhibits E-1 through E-10)
F	Minnesota Senate Committee on Health and Human Services Finance and Policy Hearing on S.F. 856, March 12, 2025 (Granicus Clip 12991 transcript)

COURTS/USDC-MN-MP
300 S 4TH ST STE 202
MINNEAPOLIS, MN 55415
(612) 664-5000

SALE

REF#: 00000000
Batch #: 132001 RIN: 2001000000
05/12/26 08:20:40
APPR CODE: 024013
VISA
*****037
Contactless
**/

AMOUNT \$405.00

APPROVED

VISA DEBIT
AID: A000000003010
TVR: 00 00 00 00 00

CUSTOMER COPY