

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF RAMSEY

SECOND JUDICIAL DISTRICT  
CRIMINAL COURT DIVISION

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State of Minnesota,

Court File No: 62-CR-15-4175

Plaintiff,

vs.

**DEFENDANT'S MOTION TO DISMISS  
THE CRIMINAL COMPLAINT**

The Archdiocese of Saint Paul and Minneapolis,  
a Minnesota Corporation  
226 Summit Avenue  
Saint Paul, MN 55102,

Defendant.

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Defendant, The Archdiocese of Saint Paul and Minneapolis (the "Archdiocese Corporation"), through its undersigned attorneys, hereby moves the Court for an Order dismissing the Criminal Complaint and all associated charges, pursuant to Minnesota Rules of Criminal Procedure 11 and 17.06, subdivisions 2(a), (b), (c), (d), (e) and (g). The Archdiocese Corporation moves to dismiss the Criminal Complaint and all associated charges because: (1) the Complaint fails to allege the Archdiocese Corporation caused or committed the criminal acts at issue and fails to allege facts constituting probable cause, (2) the Complaint violates the United States Constitution and the Minnesota Constitution and, accordingly, this Court does not have subject matter jurisdiction, and (3) the charges are untimely.

Defendant's motion to dismiss is supported by an accompanying memorandum of law and the arguments of counsel to be made at the Omnibus Hearing.

Dated: January 29, 2016

Respectfully submitted,



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