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Matter of Groebner

Supreme Court of Minnesota - June 3, 2026 - N.W.3d - 2026 WL 1579625

Widow of patrol officer who died from vascular rupture applied for line-of-duty death benefits under state public safety officer death benefits statute, claiming officer's death occurred within 24 hours of his last patrol shift.

An administrative law judge (ALJ) of the Office of Administrative Hearings granted Commissioner of Public Safety's motion for summary disposition, finding officer did not engage in nonroutine stressful or strenuous physical law enforcement activity during his last shift.

Widow appealed, and the Court of Appeals reversed and remanded. Commissioner petitioned for review, and widow conditionally cross-petitioned for review. The Supreme Court granted both petitions.

The Supreme Court held that:

- Genuine issue of material fact as to whether officer engaged in a situation involving nonroutine stressful or strenuous physical law enforcement or other emergency response activity during his final shift precluded summary disposition on whether his widow was entitled to line-of-duty death benefits, and
- If patrol officer's death did not satisfy the criteria for the statutory presumption that he was "killed in the line of duty," or the Commissioner of Public Safety successfully rebutted the presumption, widow could present her own medical evidence to show that officer was "killed in the line of duty."