

*This opinion is nonprecedential except as provided by
Minn. R. Civ. App. P. 136.01, subd. 1(c).*

**STATE OF MINNESOTA
IN COURT OF APPEALS
A25-0661**

In the Matter of the Denial of Line of Duty Death Benefits for Dallas Edeburn.

**Filed January 20, 2026
Affirmed
Larson, Judge
Dissenting, Reyes, Judge**

Office of Administrative Hearings
File No. 22-2400-40186

Keith Ellison, Attorney General, Zoe Graham, Assistant Attorney General, St. Paul, Minnesota (for relator Commissioner of Public Safety)

Daniel Harrison, Meuser, Yackley & Rowland, PA, Eden Prairie, Minnesota (for respondent Jessica Edeburn)

Considered and decided by Frisch, Chief Judge; Reyes, Judge; and Larson, Judge.

NONPRECEDENTIAL OPINION

LARSON, Judge

In this certiorari appeal, relator, the commissioner of public safety, challenges an administrative law judge's (ALJ) decision that respondent, the survivor of Ramsey County Deputy Dallas Edeburn, is eligible for a line-of-duty death benefit under Minn. Stat. § 299A.44 (2024). Under the statute, survivors are eligible for the benefit if a public safety officer was "killed in the line of duty." *Id.* The legislature has partially defined this phrase, and the Minnesota Supreme Court has previously interpreted the phrase. The partial statutory definition excludes "deaths from natural causes" except as provided in the

defining subdivision (the natural-causes exclusion). Minn. Stat. § 299A.41, subd. 3(a) (2024). A provision within that subdivision identifies certain circumstances in which a public safety officer who dies of a heart attack, stroke, or vascular rupture is “presumed to have died as the direct and proximate result of a personal injury sustained in the line of duty” (the heart-attack provision). *Id.* The presumption in the heart-attack provision is subject to rebuttal by “competent medical evidence to the contrary.” *Id.*, subd. 3(a)(3).

In this appeal, respondent concedes that Deputy Edeburn’s death does not satisfy the heart-attack provision, but the parties disagree over whether respondent is otherwise entitled to the line-of-duty death benefit. Resolving the parties’ disagreement requires us to address two issues.

First, because “‘killed in the line of duty’ does not include deaths from natural causes,” we must address the meaning of the phrase “natural causes” in the natural-causes exclusion. *See* Minn. Stat. § 299A.41, subd. 3(a). The commissioner urges us to employ a dictionary definition, while respondent argues that the supreme court has rejected that approach in favor of a more nuanced understanding of the phrase under predecessors to the current statute. Accordingly, we must determine whether the supreme court’s prior interpretation of the phrase “natural causes” still applies, or if intervening statutory amendments supersede the supreme court’s interpretation.

The second, related issue is the operation of the heart-attack provision. The commissioner argues that the provision operates as the exclusive exception to the natural-causes exclusion. Respondent argues that the provision merely creates a presumption to

aid survivors in establishing a right to the line-of-duty death benefit under certain circumstances.

For the reasons set forth below, we conclude that the supreme court's definition of "natural causes" continues to apply and that the heart-attack provision creates a rebuttable presumption that an individual was "killed in the line of duty." Accordingly, because the parties do not dispute that respondent is entitled to the line-of-duty death benefit under the statute as we interpret it, we affirm the ALJ's decision.

FACTS

The following facts are derived from the record before the ALJ, viewed in the light most favorable to the commissioner.¹

In March 2021, Deputy Edeburn was involved in a high-speed motor vehicle collision while on duty. Deputy Edeburn returned to work in December 2021 and was placed on "light duty" while he continued to recover from posttraumatic stress disorder (PTSD) and physical injuries.

On July 31, 2022, while still on "light duty," Deputy Edeburn was working. His coworkers last observed him at the patrol station around 2:30 p.m. He sent a text message to respondent, his spouse, around 4:00 p.m., indicating that he was "on [his] way," which she understood to mean that he was coming home. He was not seen or heard from again

¹ When reviewing a summary-disposition decision, we view the facts in the light most favorable to the party against whom summary disposition was granted. *Hanson v. Dep't of Nat. Res.*, 972 N.W.2d 362, 372 (Minn. 2022) (applying this standard on appeal from summary judgment); *Pietsch v. Minn. Bd. of Chiropractic Exam'rs*, 683 N.W.2d 303, 306 (Minn. 2004) (explaining that "[s]ummary disposition is the administrative equivalent of summary judgment").

until 10:00 a.m. the next day, when his coworkers found him deceased in his work vehicle. A medical examiner performed an autopsy and, in their report, listed Deputy Edeburn's immediate cause of death as "active lymphocytic myocarditis."²

Respondent applied for the line-of-duty death benefit under section 299A.44. In support of her application, respondent submitted a report from a board-certified medical doctor in occupational medicine and public health, who concluded that "Edeburn's work as a police officer was a substantial contributing factor to his chronic stress, PTSD, myocarditis, arrhythmia, and sudden death." The report specifically cited the March 2021 motor-vehicle collision as a "substantial contributing factor to the development of [Deputy] Edeburn's myocarditis."

The commissioner denied respondent's application, determining that Deputy Edeburn was not eligible for the line-of-duty death benefit because he was not "killed in the line of duty" under the definition in section 299A.41, subdivision 3(a). Respondent challenged the commissioner's eligibility determination and requested a contested-case hearing before the Court of Administrative Hearings.³

After the Court of Administrative Hearings assigned an ALJ, the parties submitted cross-motions for summary disposition. The ALJ granted respondent's motion and denied the commissioner's motion. As relevant here, the ALJ concluded the supreme court's

² The report provided the following definition of myocarditis: "Myocarditis is a condition characterized by inflammation of the myocardium, the main tissue of the wall of the heart. This inflammation can involve the entire heart or be localized to specific areas."

³ Effective August 1, 2025, the legislature changed the name of the Office of Administrative Hearings to the Court of Administrative Hearings. *See* 2025 Minn. Laws ch. 39, art. 2, § 17, at 1219 (amending Minn. Stat. § 14.48, subd. 1 (2024)).

interpretation of “killed in the line of duty” in previous versions of the death-benefit statute controlled the meaning of the phrase. *See Johnson v. City of Plainview*, 431 N.W.2d 110 (Minn. 1988); *Kramer v. State, Peace Officers Benefit Fund*, 380 N.W.2d 497 (Minn. 1986). And, applying that interpretation, the ALJ determined Deputy Edeburn was “killed in the line of duty,” and eligible for the line-of-duty death benefit under section 299A.44.

The commissioner appeals.

DECISION

Section 299A.44 requires that a \$100,000 death benefit be paid to the survivors of a public safety officer who the commissioner certifies has been “killed in the line of duty.” If the commissioner denies a survivor’s application for the line-of-duty death benefit, the survivor may request a contested-case hearing, and an ALJ then issues a final decision on eligibility. *See* Minn. Stat. § 299A.43 (2024).

Here, the commissioner challenges the ALJ’s decision to grant respondent’s motion for summary disposition and award her the line-of-duty death benefit. We apply the Minnesota Administrative Procedure Act, Minn. Stat. §§ 14.001-.69 (2024), to review an ALJ’s decision to grant summary disposition. *Hy-Vee Food Stores, Inc. v. Minn. Dep’t of Health*, 705 N.W.2d 181, 184 (Minn. 2005). As relevant here, we may reverse or modify an agency’s decision “if the substantial rights of the petitioners may have been prejudiced because the administrative” decision is “affected by . . . [an] error of law.” Minn. Stat. § 14.69(d). In cases such as this, we review legal questions de novo. *In re Wazwaz*, 943 N.W.2d 212, 217 (Minn. App. 2020), *rev. denied* (Minn. June 30, 2020). “[T]he party challenging the [agency’s] decision” bears the burden “to show that the decision should be

reversed.” *Fish v. Comm’r of Minn. Dep’t of Hum. Servs.*, 748 N.W.2d 360, 363 (Minn. App. 2008).

Determining whether the ALJ erred requires us to interpret the statutory phrase “killed in line of duty” in section 299A.41, subdivision 3(a), which includes interpreting the phrase “natural causes.” We do not do so on a blank slate because the supreme court has interpreted these terms in two cases addressing the line-of-duty death benefit under previous versions of the statute. *See Johnson*, 431 N.W.2d at 110-15; *Kramer*, 380 N.W.2d at 498-502; *see also In re Lannon*, 984 N.W.2d 575, 582-85 (Minn. App. 2022) (discussing *Kramer* and *Johnson*).

In *Kramer*, the supreme court interpreted the phrase “killed in the line of duty” in addressing a claim for the line-of-duty death benefit under the 1980 version of the statute.⁴ 380 N.W.2d at 498-99. There, a detective first suffered a heart attack while on duty walking down the steps at the police station. *Id.* at 498. He suffered a second heart attack two years later. *Id.* And, a year and a half after his retirement, he suffered a third, fatal heart attack. *Id.* at 499. On appeal from a decision to grant his survivor the line-of-duty death benefit, the supreme court was asked to interpret the phrase “killed in the line of duty.” *Id.* at 499-502. The supreme court interpreted the phrase to mean “death resulting from the performance of those duties peculiar to a [public safety] officer that expose the officer to the hazard of being killed.” *Id.* at 501. And, applying that definition, the supreme court concluded the detective was not “killed in the line of duty” because he was “engaged

⁴ The 1980 statute provided for a \$50,000 death benefit to survivors of peace officers “killed in the line of duty,” but did not define that term. *See* Minn. Stat. § 352E.04 (1980).

in the ordinary activity of administrative office routine, when he suffered his first heart attack.” *Id.* at 501-02.

In *Johnson*, the supreme court interpreted the phrase “natural causes” in addressing two claims for the line-of-duty death benefit under the 1985 version of the statute.⁵ 431 N.W.2d at 112. There, two firefighters suffered heart attacks at the scene of a fire. *Id.* at 111-12. One firefighter was pronounced dead at the hospital, the other was released from the hospital but died a few days later. *Id.* On appeal from a decision to grant the survivors the line-of-duty death benefit, the parties asked the supreme court to interpret the phrase “natural causes.” *Id.* at 114. The supreme court held:

A peace officer who dies from a heart attack or complications related to a heart attack, suffered while engaged in the hazards of firefighting, is “killed in the line of duty” under Minn. Stat. § 352E.04 (1985), and his death is not the result of “natural causes” if firefighting efforts were a substantial contributing cause of his death.

Id. at 110 (syllabus). Applying its interpretation of the phrase “natural causes,” the supreme court concluded the heart attacks the firefighters suffered “were not the result of natural causes.” *Id.* The supreme court reasoned:

[The firefighters’] deaths were not the result of natural causes. Although both men were suffering from atherosclerosis, neither was aware of this condition. In addition, expert testimony indicated that the physical and emotional stress associated with their firefighting activities was a contributing factor in the heart attacks each man suffered. Given that the

⁵ The 1985 statute provided for a \$100,000 death benefit to survivors of peace officers “killed in the line of duty” and provided that “[k]illed in the line of duty” does not include deaths from natural causes or deaths that occur during employment for a private employer other than an independent nonprofit firefighting corporation.” Minn. Stat. § 352E.04 (Supp. 1985).

Fund was established to recognize the sacrifices made by peace officers in performing hazardous work in protection of the public, *any death* which results in part from the performance of such work should qualify for Fund benefits.

Id. at 114-15 (emphasis added). In a footnote, the supreme court stated, “[i]f the legislature did not intend this result, it is free to enact new clarifying legislation,” and urged the legislature to “*clearly* define any future exclusionary language.” *Id.* at 115 n.3 (emphasis added).

In the years following *Kramer* and *Johnson*, the legislature made several amendments to the statutory scheme governing the death benefit.⁶ Most pertinent to our analysis, in 2016, the legislature amended section 299A.41, subdivision 3, to add the heart-attack provision. *See* 2016 Minn. Laws ch. 189, art. 14, § 3, at 1100.⁷ As currently codified, the statute provides:

“Killed in the line of duty” does not include deaths from natural causes, except as provided in this subdivision. In the case of a public safety officer, killed in the line of duty includes the death of a public safety officer caused by accidental means while the public safety officer is acting in the course and scope of duties as a public safety officer. Killed in the line of duty also means if a public safety officer dies as the direct and proximate result of a heart attack, stroke, or vascular rupture,

⁶ In 1990, the legislature recodified the statute and moved the natural-causes exclusion from the “Disbursements” section, recodified at Minn. Stat. § 299A.44 (1990), to the “Definitions” section, recodified at Minn. Stat. § 299A.41, subd. 3 (1990). *See* 1990 Minn. Laws ch. 591, art. 5, §§ 1, 4, at 2311-13. The recodification made *no* changes to the “natural causes” language that previously appeared in the “Disbursements” section. *See id.*; *see also* Minn. Stat. § 299A.41, subd. 3 (1990) (“‘Killed in the line of duty’ does not include deaths from natural causes”). Two years later, the legislature amended the “killed in the line of duty” partial definition in subdivision 3 to include certain accidental deaths (the accidental-death provision). 1992 Minn. Laws ch. 523, § 1, at 1317-18.

⁷ In the same law, the legislature amended the accidental-death provision to include “public safety officers,” rather than just “peace officers.” *See id.*

that officer shall be presumed to have died as the direct and proximate result of a personal injury sustained in the line of duty if . . . [listed criteria].

Minn. Stat. § 299A.41, subd. 3(a).

In 2022, our court was asked to apply the phrase “killed in the line of duty” in the context of a death by suicide. *Lannon*, 984 N.W.2d at 578-80. There, the suicide was directly traceable to PTSD caused by the public safety officer performing duties peculiar to that position. *Id.* at 585. After noting the statute only provides a partial definition of “killed in the line of duty,” we concluded that “the supreme court’s definition of ‘killed in the line of duty’ in *Kramer* and *Johnson* controls, except as to deaths specifically included or excluded by the legislature in Minn. Stat. § 299A.41, subd. 3.” *Id.* We then concluded that, because the statute neither included nor excluded deaths by suicide, *Kramer* controlled the analysis. *Id.* And because a death by suicide could result “from the performance of those duties peculiar to a [public safety] officer that expose the officer to the hazard of being killed,” we concluded the phrase “killed in the line of duty” included eligible deaths by suicide.⁸ *Id.*

To resolve this case, we must determine the meaning of the phrase “natural causes” in the natural-causes exclusion.⁹ Broadly, the commissioner argues we should apply the

⁸ In *Lannon*, we addressed Minn. Stat. § 299A.41, subd. 3 (2022). Following our decision in *Lannon*, the legislature amended subdivision 3, moving its existing language into subdivision 3(a) and adding subdivision 3(b) to expressly include certain deaths by suicide. 2023 Minn. Laws ch. 52, art. 5, § 14, at 89-90. Thus, the discussion of subdivision 3 in *Lannon* addresses the same language that we address as subdivision 3(a) in this opinion.

⁹ The department does not challenge the ALJ’s conclusion that the performance of duties peculiar to a public safety officer were a substantial contributing cause of Deputy

dictionary definition and conclude the phrase plainly means any “death from causes other than accident or violence.” *See Black’s Law Dictionary* 502 (12th ed. 2024) (defining natural death). Respondent disagrees, arguing that we are bound by the supreme court’s interpretation of the phrase “natural causes” in *Johnson* that “a death is not the result of ‘natural causes’ if [the duties peculiar to a public safety officer] were a substantial contributing cause of [the public safety officer’s] death.” 431 N.W.2d at 110 (syllabus). We agree with respondent.

The supreme court has explained that, once it has interpreted a statute, that prior interpretation guides future disputes over the meaning of the statute. *Hagen v. Steven Scott Mgmt., Inc.*, 963 N.W.2d 164, 174 (Minn. 2021). The supreme court’s interpretation “becomes part of the statute as though written therein,” *id.* (citation omitted), and stare decisis “has special force . . . because the Legislature is free to alter what [the supreme court has] done,” *Koehnen v. Flagship Marine Co.*, 947 N.W.2d 448, 453 (Minn. 2020) (citation omitted). *See also* Minn. Stat. § 645.17 (2024) (explaining that “when a court of last resort has construed the language of a law,” courts may presume that the legislature intends for the same construction to apply in subsequent laws on the same subject matter). If we conclude that the supreme court’s prior interpretations remain in force, we need not undertake any independent interpretative efforts; indeed, we are precluded from doing so.

Edeburn’s death. And respondent does not challenge that Deputy Edeburn’s death does not meet the requirements set forth in the heart-attack provision. As such, these arguments are forfeited. *See Jundt v. Jundt*, 12 N.W.3d 201, 204 (Minn. App. 2024), *rev. denied* (Minn. Dec. 31, 2024). Thus, the resolution of this case hinges on our interpretation of the phrase “natural causes” in the natural-causes exclusion.

See State v. Curtis, 921 N.W.2d 342, 346 (Minn. 2018) (“The court of appeals is bound by supreme court precedent.”).

As described above, in *Johnson*, the supreme court interpreted the phrase “natural causes” and held that a death is not the result of natural causes if the duties peculiar to a public safety officer “were a substantial contributing cause” of the public safety officer’s death. 431 N.W.2d at 110 (syllabus).¹⁰ After *Johnson*, the legislature recodified the line-of-duty death-benefit statute into a different statutory chapter and moved the natural-causes exclusion from the section providing the benefit to a definitions section. The legislature later added the heart-attack provision and added a clause to the end of the natural-causes exclusion, so that it now reads: “Killed in the line of duty does not include deaths from natural causes, except as provided in this subdivision.” Minn. Stat. § 299A.41, subd. 3(a). But none of these post-*Johnson* legislative amendments redefined the phrase “natural

¹⁰ The department argues that *Johnson* did not define the phrase “natural causes.” But in the syllabus, the supreme court explicitly interpreted the phrase. *Id.* at 110. A case’s syllabus “summarizes the [authoring court’s] holding.” *Albright v. Henry*, 174 N.W.2d 106, 111 (Minn. 1970). The Minnesota Supreme Court authors its own syllabi. *Sharood v. Hatfield*, 210 N.W.2d 275, 280 (Minn. 1973); *see also* Minn. Stat. § 480.06 (2024) (“In all cases decided by the [supreme] court, it shall give its decision in writing . . . together with headnotes, briefly stating the points decided.”). Therefore, it may be cited as legal authority. *See Albright*, 174 N.W.2d at 111 (quoting syllabus as authority); *Sefkow v. Sefkow*, 427 N.W.2d 203, 214 (Minn. 1988) (citing syllabus of a prior opinion as authority). Further, in the body of the *Johnson* opinion, the supreme court explicitly concluded that the two firefighters’ “deaths were not the result of natural causes” because “*any death* which results in part from the performance of [hazardous work for the protection of the public] should qualify for” the line-of-duty death benefit. *Johnson*, 431 N.W.2d at 114-15 (emphasis added). Therefore, we are not persuaded that the supreme court did not interpret the phrase “natural causes” in *Johnson*.

causes,” despite the supreme court’s invitation for the legislature to supersede *Johnson* with clarifying language if the conclusion in *Johnson* was not the legislature’s intent.

The commissioner disagrees, arguing the legislature redefined the phrase “natural causes” when it added the “except as provided in this subdivision” language and the heart-attack provision.¹¹ According to the commissioner, these changes plainly indicated the legislature intended to redefine the phrase “natural causes” to mean the dictionary definition—an interpretive tool *expressly* rejected in *Johnson*. 431 N.W.2d at 114 (stating the phrase “natural causes” is not “a term of art which is commonly defined”). We are not persuaded for two reasons.

First, the heart-attack provision operates as a rebuttable “presumption.” As set forth above, the heart-attack provision provides that “[k]illed in the line of duty also means” a public safety officer “shall be *presumed* to have died as the direct and proximate result of

¹¹ The commissioner relies on language in *Lannon* stating that “[t]he legislature’s subsequent enactment of Minn. Stat. § 299A.41, subd. 3, and revisions to that provision, clarified the exclusion of deaths from natural causes” but did not “supersede the overarching interpretation adopted by the supreme court.” 984 N.W.2d at 585. But, because *Lannon* involved a death by suicide, we were not required in that case to interpret the phrase “natural causes.” The department also relies on our nonprecedential opinions in *In re Groebner*, No. A24-1410, 2025 WL 1430594, at *1 (Minn. App. May 19, 2025), *rev. granted* (Minn. Aug. 27, 2025), and *In re Jones*, No. A25-0443, 2025 WL 2752621, at *1 (Minn. App. Sept. 29, 2025), *rev. granted* (Minn. Dec. 17, 2025). These opinions are not binding, and we do not find them persuasive on this issue. See Minn. R. Civ. P. 136.01, subd. 1(c). *Groebner* did not require this court to define the phrase “natural causes” because the issue in *Groebner* was whether the requirements for the heart-attack provision were met. 2025 WL 1430594, at *3. In *Jones*, we concluded that a firefighter’s heart attack, which occurred six years after his retirement, was specifically excluded by the statute because it did not meet the requirements of the heart-attack provision. 2025 WL 2752621, at *5. But we also concluded that the firefighter’s death would not meet the “natural causes” definition set forth in *Johnson*. *Id.*

a personal injury sustained in the line of duty” if they “die[] as the direct and proximate result of a heart attack, stroke, or vascular rupture” and meet certain listed criteria. Minn. Stat. § 299A.41, subd. 3(a) (emphasis added). The word “presume” means “[t]o accept something as true until it is shown not to be true.” *Black’s Law Dictionary* 1435 (12th ed. 2024) (defining presume). Thus, the heart-attack provision’s plain language does not indicate any intent to alter the meaning of the phrase “natural causes” in the natural-causes exclusion.

Second, the addition of the phrase “except as provided in this subdivision” does not offer a new definition of the phrase “natural causes” or indicate an intent to alter the supreme court’s prior interpretation. Instead “natural causes” retains the same meaning provided in *Johnson* and exceptions to the natural-causes exclusion only arise from the statute. Our conclusion aligns with the timing of the addition of the phrase, which the legislature added when it included the heart-attack provision. Thus, the legislature may have understood that certain circumstances may not qualify as a “natural cause” death under *Johnson*, yet a survivor may nonetheless be entitled to benefits under the presumption. Accordingly, we are not convinced that the legislature intended to alter the supreme court’s interpretation of “natural causes” when it added the phrase “except as provided in this subdivision.”

In sum, and for the foregoing reasons, we must “presume that the Legislature intended for [the supreme court’s] interpretation . . . to be placed upon the current statutory language.” *Keystone Twp. v. Red Lake Watershed Dist.*, 20 N.W.3d 612, 621 (Minn. 2025). This is especially so because the supreme court directed that the legislature should “*clearly*

define any future exclusionary language” if it did not intend the result in *Johnson*. See 431 N.W.2d at 115 n.3 (emphasis added). Therefore, we must follow the supreme court’s precedent and conclude that a death is not the result of “natural causes” if the duties peculiar to a public safety officer “were a substantial contributing cause of [the public safety officer’s] death.” *Id.* Because the commissioner does not challenge the ALJ’s determination that Deputy Edeburn’s professional duties were a substantial contributing cause of his death, we conclude the ALJ correctly determined respondent is entitled to the line-of-duty death benefit.

While we conclude the supreme court’s interpretation in *Johnson* is controlling, we note that we would reach the same result if we applied our principles of statutory interpretation. “The object of all interpretation and construction of laws is to ascertain and effectuate the intention of the Legislature.” *City of Brainerd v. Brainerd Invs. P’ship*, 827 N.W.2d 752, 755 (Minn. 2013); see also Minn. Stat. § 645.16 (2024). “When legislative intent is clear from the statute’s plain and unambiguous language, we interpret the statute according to its plain meaning.” *City of Brainerd*, 827 N.W.2d at 755. “We do not resort to extrinsic sources when interpreting a statute unless the statute is ambiguous.” *Id.* at 757. A statute is ambiguous if “the statutory language is susceptible to more than one reasonable interpretation.” *Spann v. Minneapolis City Council*, 979 N.W.2d 66, 73 (Minn. 2022) (quotation omitted). Here, we would conclude the phrase “natural causes” is ambiguous because both parties offer reasonable interpretations.

As explained above, the commissioner relies on a dictionary definition to contend that the phrase “natural causes” means any “death from causes other than accident or

violence.” See *Black’s Law Dictionary* 502 (12th ed. 2024) (defining natural death). And, according to the commissioner, the heart-attack provision operates as the sole “exception” to the natural-causes exclusion. Thus, the commissioner argues that public safety officers who previously qualified under *Johnson* are not entitled to the line-of-duty death benefit unless they satisfy the criteria in the heart-attack provision. We conclude the commissioner’s proposed interpretation is reasonable because the supreme court often relies on dictionaries to interpret undefined terms. *McBee v. Team Indus., Inc.*, 26 N.W.3d 847, 853 (Minn. 2025) (“When the Legislature has not defined a statutory term, we may consider dictionary definitions to determine the term’s common usage, and when legal terms are referenced in statutes we often look to legal dictionaries.”).

Respondent contends that “natural causes” means deaths where the duties peculiar to a public safety officer were not a substantial contributing cause of their death. Further, relying on the legislature’s use of the word “presumed,” respondent argues the heart-attack provision operates—primarily—as a presumption. Accordingly, respondent reasons that the legislature intended to make it easier for certain survivors to qualify for the line-of-duty benefit when it added the heart-attack provision. Given the context of the statute and the supreme court’s prior determination that the phrase “natural causes” is not a “term of art which is commonly defined,”¹² we conclude the more nuanced interpretation presented by respondent is also reasonable. See *State v. Scovel*, 916 N.W.2d 550, 555 (Minn. 2018) (“[I]t is one of the surest indexes of a mature and developed jurisprudence not to make a

¹² The supreme court expressly rejected interpreting the phrase “natural causes” to mean “only deaths caused solely by an external force” in *Johnson*. 431 N.W.2d at 114.

fortress out of the dictionary” (quoting *Cabell v. Markham*, 148 F.2d 737, 739 (2d Cir. 1945)); *Buzzell v. Walz*, 974 N.W.2d 256, 261 (Minn. 2022) (explaining that the “specific meaning of a word depends on how it is being used in context” (quotation omitted)).

When a statute is ambiguous, we may consider the post-ambiguity canons of construction¹³ and other indicia of legislative intent. *See Spann*, 979 N.W.2d at 73; Minn. Stat. § 645.16. These include:

- (1) the occasion and necessity for the law;
- (2) the circumstances under which it was enacted;
- (3) the mischief to be remedied;
- (4) the object to be attained;
- (5) the former law, if any, including other laws upon the same or similar subjects;
- (6) the consequences of a particular interpretation;
- (7) the contemporaneous legislative history; and
- (8) legislative and administrative interpretations of the statute.

Minn. Stat. § 645.16.

Beginning with “the occasion and necessity for the law,” the purpose of the line-of-duty death benefit is “to recognize the sacrifices made by [public safety] officers in performing hazardous work in protection of the public.” *Johnson*, 431 N.W.2d at 115. And with respect to the “former law,” over the years, the legislature has consistently *expanded* the definition of “killed in the line of duty,” making a greater—not a fewer—number of survivors eligible for the line-of-duty death benefit.¹⁴ Accordingly, the

¹³ The supreme court distinguishes between pre- and post-ambiguity canons of construction. *See State v. Lee*, 22 N.W.3d 608, 614 (Minn. App. 2025).

¹⁴ *See* 1985 Minn. Laws 1st Spec. Sess. ch. 7, § 10, at 1656 (expanding coverage for deaths from certain private employers); 1992 Minn. Laws ch. 523, § 1, at 1317-18 (expanding

legislature has over time demonstrated its intent that more survivors receive this benefit, counseling against the commissioner’s proposed interpretation.

Moving to “the mischief to be remedied,” “object to be attained,” and “the contemporaneous legislative history,” all the legislative history surrounding the addition of the heart-attack provision indicates that the legislature intended to “expand” eligibility for the line-of-duty death benefit. Both the House and Senate research departments described the addition of the heart-attack provision as an “expansion” of coverage. Minn. H.R. Rsch. Dep’t, B. Summary of H.F. No. 2810 (Mar. 22, 2016) (noting the amendment “expands coverage to officers who die from work-connected heart attacks, strokes, and vascular ruptures”); Minn. S. Rsch. Dep’t, B. Summary of S.F. No. 2743 (Mar. 23, 2016) (stating that the inclusion of the heart-attack provision “expands the definition of ‘killed in the line of duty’”). During the hearings on whether the legislature should add the heart-attack provision, supporters testified that its purpose was to lessen the burden of proof for families to obtain the benefit. *E.g.*, Hearing on H.F. No. 2810 Before the H.R. Pub. Safety & Crime Prev. Pol’y & Fin. Comm. (Mar. 22, 2016) (statements of Rep. Howe & Chris Parsons, President, Minn. Pro. Firefighters); Hearing on S.F. No. 2743 Before the S. Judiciary Comm. (Mar. 22, 2016) (statements of Sen. Pappas & Michael Smith, President, St. Paul Firefighters Union). And, at the time the legislature was considering the amendment, it was aware that the bill carried a fiscal note. Minn. Dep’t of Pub. Safety,

coverage for certain accidental deaths); 2016 Minn. Laws ch. 189, art. 14, § 3, at 1100 (expanding coverage to cover more accidental deaths and adding the heart-attack provision); 2023 Minn. Laws ch. 52, art. 5, § 14, at 67 (expanding coverage to include certain deaths by suicide).

Fiscal Note on H.F. 2810, *HF2810-0-Pub. Safety Officer Death Benefits Mod* (Mar. 29, 2016). The fiscal note indicated that, prior to 2016, the fund predicted approximately “2 payouts” per year. *Id.* at 2. But, if the bill was passed, the assumed number of payouts would double. *Id.* In all the legislative history, we have found no indication that the legislature intended that a public safety officer who qualified for the line-of-duty death benefit before the adoption of the heart-attack provision would no longer be eligible. This intent to expand coverage and lower the burden of proof for survivors also counsels against the commissioner’s proposed interpretation that the legislature narrowly defined the phrase “natural causes” when it adopted the heart-attack provision.

Finally, considering the “consequences of a particular interpretation,” we would not adopt the commissioner’s proposed interpretation because it potentially poses a constitutional problem. “If a statute is ambiguous, the construction that avoids constitutional problems should be used, even if such a construction is less natural.” *Olmanson v. LeSueur County*, 693 N.W.2d 876, 879 (Minn. 2005).

In *Dependents of Ondler v. Peace Officers Benefit Fund*, the supreme court addressed the constitutionality of a statutory provision that excluded from eligibility for the line-of-duty death benefit deaths resulting from heart attacks.¹⁵ 289 N.W.2d 486, 489-90 (Minn. 1980). The supreme court concluded that the provision violated the Equal Protection Clause. *Id.* at 489. The supreme court reasoned that there was no rational basis

¹⁵ In *Ondler*, the supreme court addressed a claim for the line-of-duty death benefit under the 1978 version of the statute. Minn. Stat. § 352E.04 (1978). The statute provided for a \$50,000 payment to eligible survivors and provided, in relevant part, that “killed in the line of duty shall not include any peace officer who dies as a result of a heart attack.” *Id.*

for solely excluding heart attacks from the line-of-duty death benefit, because “the same stresses which triggered Ondler’s heart attack could have caused respiratory failure, such as an acute asthma attack, and several types of strokes, including aneurysms, in persons susceptible to such occurrences.” *Id.* Thus, because Ondler would have been eligible for the benefit if his “death resulted from any of these other causes,” there was no rational basis for the exclusion. *Id.*

Here, the commissioner’s proposed interpretation presents a similar problem. The commissioner contends that all “death[s] from causes other than accident or violence” are excluded from the line-of-duty death benefit, with an exception for certain deaths caused by “heart attack, stroke, or vascular rupture.” But this creates the same problem identified in *Ondler*. “[T]he same stresses which trigger[]” a heart attack or stroke, could cause respiratory failure, an asthma attack, or, even myocarditis. *Id.* Adopting respondent’s proposed interpretation avoids this potential constitutional issue.

For these reasons, even if we concluded that *Johnson* was not controlling, we would still interpret the natural-causes exclusion consistent with its holding.

Affirmed.

REYES, Judge (dissenting)

Relator Commissioner of the Minnesota Department of Public Safety (the department) argues that an administrative-law judge (ALJ) erred by granting summary disposition to respondent survivor of Deputy Dallas Edeburn by determining that he was “killed in the line of duty” when he died of active lymphocytic myocarditis because that cause of death is not expressly included or excluded under Minn. Stat. § 299A.41, subd. 3 (2024).¹ The department argues that: (1) the plain and unambiguous language of this subdivision “does not include deaths from natural causes” in the definition of “killed in the line of duty” and Deputy Edeburn died from natural causes; (2) “active lymphocytic myocarditis” is *not* a heart attack, stroke, or vascular rupture, which would have raised a rebuttable presumption that a person “died as the direct and proximate result of a personal injury sustained in the line of duty” and was “killed in the line of duty,” but only if certain requirements were met; and (3) even if Deputy Edeburn had died from a heart attack, stroke, or vascular rupture—which he did not—respondent’s claim would still fail because Deputy Edeburn did not participate in nonroutine stressful or strenuous physical law-enforcement activity within 24 hours of his death. I agree with the department and would reverse and remand. I therefore respectfully dissent.

¹ I cite the most recent version of this statute because it has not been amended in relevant part. *But see Interstate Power Co. v. Nobles Cnty. Bd. of Comm’rs*, 617 N.W.2d 566, 575 (Minn. 2000) (stating that, generally, “appellate courts apply the law as it exists at the time they rule on a case”). Although the legislature amended the statute after Deputy Edeburn’s 2022 death, *see* 2023 Minn. Laws ch. 52, art. 5, § 14, at 877-78, the amendment does not change the substance of the applicable section, but only renumbers the statute and adds an additional subsection.

The department challenges the ALJ's grant of summary disposition. "Summary disposition is the administrative equivalent of summary judgment." *Pietsch v. Minn. Bd. of Chiropractic Exam'rs*, 683 N.W.2d 303, 306 (Minn. 2004). "Summary disposition is appropriate only when there is no genuine issue as to any material fact and the moving party is entitled to judgment as a matter of law." *In re Lannon*, 984 N.W.2d 575, 580 (Minn. App. 2022). Appellate courts review an ALJ's grant of summary disposition de novo to "determin[e] whether there are any genuine issues of material fact and whether there was an error in applying the law to the facts." *Pietsch v. Minn. Bd. of Chiropractic Exam'rs*, 683 N.W.2d 303, 306 (Minn. 2004). "In doing so, we view the evidence in the light most favorable to the nonmoving party" here, the department. *Lannon*, 984 N.W.2d at 580.

I. The ALJ erred by granting summary disposition to respondent because it misinterpreted and misapplied caselaw.

Respondent argues that supreme court definitions from 1986 and 1988 cases control because "killed in the line of duty" is not defined by the statute. I disagree.

Appellate courts review the interpretation of a statute de novo. *In re NorthMet Project Permit to Mine Application*, 959 N.W.2d 731, 744 (Minn. 2021). The main goal of statutory interpretation "is to ascertain and effectuate the intention of the legislature." Minn. Stat. § 645.16 (2024). "Every law shall be construed, if possible, to give effect to all its provisions." *Id.*; *see also Hagen v. Steven Scott Mgmt., Inc.*, 963 N.W.2d 164, 169 (Minn. 2021) (explaining that statutory interpretation requires appellate courts to "read[] the statute as a whole").

Statutory “words and phrases are construed according to rules of grammar and according to their common and approved usage.” Minn. Stat. § 645.08(1) (2024). “When a statute is unambiguous, we interpret it according to the plain meaning of its text.” *Pfoser v. Harpstead*, 939 N.W.2d 298, 310 (Minn. App. 2020) (quotation omitted), *aff’d*, 953 N.W.2d 507 (Minn. 2021). “A statute is ambiguous when its language is subject to more than one reasonable interpretation.” *State v. Riggs*, 865 N.W.2d 679, 682 (Minn. 2015).

This court recently outlined the history of section 299A.41, subdivision 3, and the death-benefit statute. *See Lannon*, 984 N.W.2d at 581, 583-84. We noted that the legislature amended the statute several times since its enactment in 1973. *Id.* at 581. I highlight a few of the relevant amendments. In 1984, the legislature defined “killed in the line of duty” by what it does not include, stating in part: “‘Killed in the line of duty’ does not include deaths from natural causes.” 1984 Minn. Laws ch. 654, art. 2, § 126, at 1988. In 1990, the legislature recodified the death-benefit statute and moved this language to a new “definitions” section. *See* 1990 Minn. Laws ch. 591, art. 5, § 1, at 2311-13. From that point through 2024, the legislature expanded the statute’s coverage by adding in language to cover, if certain requirements are met, (1) accidents, *see* 1992 Minn. Laws ch. 523, § 1, at 1317-18; (2) relevant to our analysis, heart attacks, strokes, and vascular ruptures from the natural-causes exclusion, *see* 2016 Minn. Laws ch. 189, art. 14, § 3, at 1100; and (3) deaths by suicide, *see* 2023 Minn. Laws ch. 52, art. 5, § 14, at 877-78.

In dispute here are the effects of the changes the legislature made to the statute after two supreme court cases, *Kramer v. State, Peace Officers Benefit Fund*, 380 N.W.2d 497

(Minn. 1986) and *Johnson v. City of Plainview*, 431 N.W.2d 109 (Minn. 1988). Before analyzing these changes, I provide a brief overview of *Kramer* and *Johnson*.

Kramer defined “‘killed in the line of duty’ . . . as death resulting from the performance of those duties peculiar to a peace officer that expose the officer to the hazard of being killed.” 380 N.W.2d at 501. In doing so, the supreme court rejected the definition of “killed in the line of duty” proposed by the Workers’ Compensation Court of Appeals (WCCA), which required that the officer’s “employment as a peace officer was a substantial, contributing cause of his death.” *Id.* at 499, 501; *see also id.* at 502 (Scott, J., dissenting) (describing WCCA ruling). Ultimately, the officer in *Kramer* did not qualify for death benefits because the causal chain leading to his death originated with a heart attack suffered while walking down steps and, even though he was “on duty” at the time, walking down steps was not “a duty peculiar to” his employment. *See id.* at 502 (majority opinion).

The supreme court in *Johnson* did not expand or change *Kramer*’s definition of “killed in the line of duty.” Instead, *Johnson* carved out an exception to the statutory exclusion for natural-cause deaths. *See* 431 N.W.2d at 114 (distinguishing *Kramer*). As the majority notes, the second syllabus point in *Johnson* states: “A peace officer who dies from a heart attack or complications related to a heart attack, suffered while engaged in the hazards of firefighting, is ‘killed in the line of duty’ under Minn. Stat. § 352E.04 (1985), and his death is not the result of ‘natural causes’ if firefighting efforts were a substantial contributing cause of his death.” *Id.* at 110 (syllabus). This is a narrow exception to the *Johnson*-era statute’s natural-causes exclusion, with the following requirements: (1) the

decedent must be a peace officer; (2) who suffered a heart attack “while engaged in the hazards of” being a peace officer; (3) who died “from a heart attack or complications related to a heart attack;” and (4) whose efforts as a peace officer “were a substantial contributing cause of his death.”² *Id.*

The supreme court also stated in a footnote: “*If the legislature did not intend this result, it is free to enact new clarifying legislation.* We urge the legislature to clearly define any future *exclusionary language.*” *Id.* at 115 n.3 (emphasis added) (citation omitted).

The statutory history demonstrates that the legislature heeded the supreme court’s call and enacted “new clarifying legislation” and “exclusionary language” post-*Johnson*. The 1980 version of the statute, which *Kramer* interpreted, included only one exclusion from the definition of “killed in the line of duty”:

For the purpose of [this statute], killed in the line of duty shall not include any peace officer who dies as a result of a heart attack.

Minn. Stat. § 352E.04 (1980). By the time the supreme court decided *Kramer*, it had already held that this exclusion was unconstitutional. *See Dependents of Ondler v. Peace Officers Benefit Fund*, 289 N.W.2d 486, 490 (Minn. 1980) (holding heart-attack exclusion violated equal protection). The *Kramer* court then defined “killed in the line of duty”

² Even if I were to assume that the limited exception from *Johnson* controls here—which I contend it does not—respondent would not qualify for benefits. It is undisputed that his cause of death was not a heart attack or complications from one. While the majority relies heavily on the “substantial contributing cause” requirement, this reliance is unpersuasive because, at a minimum, Deputy Edeburn cannot meet the second and third requirements from *Johnson*.

without relying on statutory language. *See Kramer*, 380 N.W.2d at 500-01 (looking to statutory purpose).

The 1985 version of the statute, which *Johnson* interpreted, provided two new exclusions:

“Killed in the line of duty” does not include deaths from natural causes or deaths that occur during employment for a private employer other than an independent nonprofit firefighting corporation.

Id. (1985).

As applicable here, the 2024 version of the statute states:

(a) “*Killed in the line of duty*” does not include deaths from natural causes, except as provided in this subdivision. In the case of a public safety officer, “killed in the line of duty” includes the death of a public safety officer caused by accidental means while the public safety officer is acting in the course and scope of duties as a public safety officer. Killed in the line of duty also means if a public safety officer dies as the direct and proximate result of a heart attack, stroke, or vascular rupture, that officer shall be presumed to have died as the direct and proximate result of a personal injury sustained in the line of duty if:

(1) that officer, while on duty:

(i) engaged in a situation, and that engagement involved nonroutine stressful or strenuous physical law enforcement, fire suppression, rescue, hazardous material response, emergency medical services, prison security, disaster relief, or other emergency response activity; or

(ii) participated in a training exercise, and that participation involved nonroutine stressful or strenuous physical activity;

(2) that officer died as a result of a heart attack, stroke, or vascular rupture suffered:

(i) while engaging or participating under clause (1);

(ii) while still on duty after engaging or participating under clause (1); or

(iii) not later than 24 hours after engaging or participating under clause (1); and

(3) the presumption is not overcome by competent medical evidence to the contrary.

(b) “Killed in the line of duty” also means that the officer died due to suicide:

(1) secondary to a diagnosis of posttraumatic stress disorder as described in the most recent edition of the Diagnostic and Statistical Manual of Mental Disorders published by the American Psychiatric Association; or

(2) within 45 days of the end of exposure, while on duty, to a traumatic event.

Minn. Stat. § 299A.41, subd. 3 (emphasis added).

The similarities between the current statute and the *Johnson*-era statute start and end with the first clause of the first sentence, italicized above. Significantly, after *Johnson*, the legislature defined “deaths from natural causes” by creating exceptions to it. These exceptions include the presumption that a death from a heart attack, stroke, or vascular rupture constitutes being “killed in the line of duty,” but only if certain requirements are met.

We recognized this statutory history in *Lannon*. There, this court concluded that “the supreme court’s definition of ‘killed in the line of duty’ in *Kramer* and *Johnson* controls, *except as to deaths specifically included or excluded by the legislature* in Minn. Stat. § 299A.41, subd. 3.” 984 N.W.2d at 585 (emphasis added).³ After *Kramer* and

³ This court came to the same conclusion in *In re Jones*, No. A25-0443, 2025 WL 2752621, at *4-5 (Minn. App. Sept. 29, 2025), *rev. granted* (Minn. Dec. 17, 2025). There, this court considered whether death benefits could be awarded to the surviving spouse of a firefighter who died from a heart attack six years after his retirement. *Id.* at *1. After noting that Jones’ death certificate stated that he died from natural causes and not within 24 hours of strenuous duty-related activities, we concluded that he did not sustain a heart attack in the line of duty and that the natural-causes exception in the statute rendered his surviving spouse ineligible for death benefits. *Id.* at *3, *5. This court also relied on *Lannon* to reject

Johnson, the legislature specifically added exceptions to the natural-death exclusion. *See id.* This court therefore concluded that “[t]he legislature’s subsequent enactment of Minn. Stat. § 299A.41, subd. 3, and revisions to that provision, clarified the exclusion of deaths from natural causes.” *Id.* In other words, the statute now defines “killed in the line of duty” by what is included and excluded. This was crucial to *Lannon* because it allowed this court to go beyond the 2022 statute’s language, which neither included nor excluded deaths by suicide, and instead look to the definition established in *Kramer* and *Johnson*. *See id.* at 585-87. We then held that “an officer’s death by suicide may fit the supreme court’s definition of the phrase ‘killed in the line of duty’” established in those cases. *Id.* at 587. After *Lannon*, as discussed, the legislature amended the statutory language to also include certain deaths by suicide. *See* 2023 Minn. Laws ch. 52, art. 5, § 14, at 877-78.

Respondent’s approach assumes that the statute that exists today is the same one that *Johnson* interpreted. That is not true. Respondent ignores the substantial changes to the statute. By focusing primarily on the first phrase and third line, respondent’s interpretation also violates the whole-statute canon, which requires courts to give effect to all the provisions of a statute. *See* Minn. Stat. § 645.16. I therefore conclude that the definition and exclusion from *Kramer* and *Johnson* do not apply to this case.

the argument that the definition from *Kramer* and *Johnson* controls because “[b]oth cases were issued prior to the amendments refining the natural-causes exclusion.” *Id.* at *5 (citing 2016 Minn. Laws ch. 189, art. 14, § 3, at 1100). We noted that, after *Johnson*, the legislature refined the natural-cause exception and, “as we recognized in *Lannon*, that natural-causes exclusion controls.” *Id.* (citing *Lannon*, 984 N.W.2d at 585).

II. The ALJ erred by granting summary disposition to respondent because it misinterpreted and misapplied Minn. Stat. § 299A.41, subd. 3.

The department argues that Deputy Edeburn’s death by natural causes does not qualify for death benefits because (1) his death was explicitly excluded from the definition of “killed in the line of duty” under the plain language of section 299A.41, subdivision 3; (2) a natural death by active lymphocytic myocarditis is not the same as death by a heart attack, stroke, or vascular rupture and therefore those exceptions and any presumptions do not apply; and (3) even if Deputy Edeburn’s death fell into the exception for heart attacks, strokes, and vascular ruptures—which it does not—he does not meet the statutory requirements to qualify for benefits. I agree.

A. Deputy Edeburn’s death was explicitly excluded from the definition of “killed in the line of duty.”

The first part of the statute states: “‘Killed in the line of duty’ does not include deaths from natural causes, *except as provided in this subdivision.*” Minn. Stat. § 299A.41, subd. 3(a) (emphasis added). The plain and unambiguous language of that sentence could not be clearer: the phrase “killed in the line of duty” does not include deaths from natural causes, with some exceptions.

The department asserts that the ALJ erred by determining that Deputy Edeburn’s cause of death was not expressly included or excluded by the plain language of Minn. Stat. § 299A.41, subd. 3. I conclude that the ALJ erred in its interpretation because the plain language of the statute is clear that “death from natural causes” is “*not include[d]*” as part of the definition of “killed in the line of duty,” unless an exception applies.

The undisputed record shows that Deputy Edeburn died from “natural causes,” with the immediate cause of death being “active lymphocytic myocarditis.” The medical examiner’s report lists Deputy Edeburn’s immediate cause of death to be from “natural disease,” and lists the specific cause as “active lymphocytic myocarditis.” Deputy Edeburn’s death certificate lists the manner of death as “natural.” *See Lannon*, 984 N.W.2d. at 579 (citing death certificate for “contributing conditions” to decedent’s death).⁴ In addition, respondent’s expert, Dr. Mason D. Harrell III, reviewed Deputy Edeburn’s medical records and did not dispute that he died of natural causes or active lymphocytic myocarditis. I therefore conclude that the plain language of the statute excludes Deputy Edeburn’s natural-cause death from the definition of “killed in the line of duty,” unless an exception applies.

B. “Active lymphocytic myocarditis” is not a heart attack, stroke, or vascular rupture.

The plain language of the statute states that a death from natural causes is excluded from the definition of killed in the line of duty “*except as provided within this subdivision.*” Minn. Stat. § 299A.41, subd. 3(a) (emphasis added). In other words, the statute’s plain language creates an exception to the natural-causes exclusion for deaths that are “the direct and proximate result of a heart attack, stroke, or vascular rupture,” subject to certain other requirements. *Id.*

⁴ In *Jones*, 2025 WL 2752621, at *1, *3, this court noted that “Jones’s death certificate provides that he died of natural causes” and that “[t]he medical examiner concluded that the immediate cause of death was probable myocardial infarction (heart attack).” While *Jones* is nonprecedential and is cited for its persuasive value only, *see* Minn. R. Civ. App. P. 136.01, subd. 1(c), it is strikingly similar to the case at hand.

This exception becomes a presumption⁵ of being killed in the line of duty, but only if certain requirements are met. *See id.* But myocarditis is a different and distinct cause of death from a heart attack, much less a stroke or a vascular rupture. Myocarditis is the inflammation of *the heart's muscular walls*, often caused by a viral infection or an autoimmune disease. In contrast, a heart attack, also known as a myocardial infarction, is the death of heart tissue caused by a blockage of blood flow *to the heart*, typically from a build-up of plaque in the arteries. *See The American Heritage Dictionary of the English Language* 811 (5th ed. 2018) (defining “heart attack” as a “[s]udden interruption or insufficiency of the supply of blood to the heart”).

Here, the undisputed cause of death was active lymphocytic myocarditis. There is no mention whatsoever of a heart attack or myocardial infarction in the medical examiner’s report or the death certificate. Indeed, even the report from respondent’s expert, Dr. Harrell, does not include the words “heart attack” or “myocardial infarction.” Death from active lymphocytic myocarditis is not death “as the direct and proximate result of a heart attack, stroke, or vascular rupture.” *See* Minn. Stat. § 299A.41, subd. 3(a).

Because Deputy Edeburn’s death from natural causes is excluded by the plain and unambiguous language of Minn. Stat. § 299A.41, subd. 3, and it does not meet the natural-causes exception of a death by a heart attack, stroke, or vascular rupture, he was not “killed in the line of duty” and does not qualify for death benefits.

⁵ In its motion for summary disposition before the ALJ, respondent argued without supporting authority that the decisionmaker must first determine whether the presumption under subdivision 3 applies. The ALJ correctly dismissed this argument as inconsistent with *Lannon*.

C. Deputy Edeburn cannot meet the statutory work-related requirements.

Even if Deputy Edeburn's death had been the direct and proximate result of a heart attack—which, again, it was not—he does not meet the remaining requirements of the natural-causes exception.

Continuing the analysis of the whole statutory provision, the natural-causes exception creates a rebuttable presumption that the person was killed in the line of duty, but only if: (1) “that officer, while on duty” engaged in “nonroutine stressful or strenuous” physical activity; (2) “that officer died as a result of a heart attack, stroke, or vascular rupture suffered” while engaging in that activity, while still on duty after engaging in that activity, or “not later than 24 hours after engaging” in that activity; and (3) “the presumption is not overcome by competent medical evidence to the contrary.” *Id.*, subd. 3(a)(1)-(3).

Deputy Edeburn cannot meet any of these requirements. Viewing the record in the light most favorable to the department as the nonmoving party, the record reflects that Deputy Edeburn was on “light duty” at the time of his death. His spouse stated that he “was cleared for light duty,” and engaged in “desk work,” “observations and investigations,” and “surveillance.” The record does not support a conclusion that he was then engaged, nor that had he recently engaged, in any “nonroutine stressful or strenuous physical” activity or training exercise. *Id.*, subd. 3(a)(1)(i), (ii). As a result, he cannot meet the requirements to qualify for the presumption of being killed in the line of duty under section 299A.41, subdivision 3(a)(1)-(2). Further, the record contains competent medical evidence, including from the medical examiner and Dr. Harrell, that Deputy Edeburn died

from myocarditis and not one of the exceptions. This evidence would rebut any presumption under subdivision 3(a)(3).

III. Minn. Stat. § 299A.41, subd. 3, meets the rational-basis test and does not violate the estate’s equal-protection rights.

Respondent, citing *Ondler*, 289 N.W.2d at 489, argues that a natural-causes exclusion would be unconstitutional because it would differentiate based on the manner of death between officers who die from the same stimuli but at different times. I disagree.

The Equal Protection Clause of the United States Constitution provides: “No State shall . . . deny to any person within its jurisdiction the equal protection of the laws.” U.S. Const. amend. XIV, § 1. Similarly, the equal-protection guarantee in the Minnesota Constitution provides: “No member of this state shall be disfranchised or deprived of any of the rights or privileges secured to any citizen thereof, unless by the law of the land or the judgment of his peers.” Minn. Const. art. I, § 2. Appellate courts review alleged equal-protection violations de novo. *State v. Holloway*, 916 N.W.2d 338, 347 (Minn. 2018). The threshold issue in an equal-protection analysis “is whether the claimant is treated differently from others to whom the claimant is similarly situated in all relevant respects.” *Id.* (quotation omitted). Minnesota’s rational-basis test is more stringent than the federal test and requires that (1) the challenged distinction “not be manifestly arbitrary or fanciful,” (2) the challenged distinction “be genuine or relevant to the purpose of the law,” and (3) “the purpose of the statute must be one that the state can legitimately attempt to achieve.” *Id.* at 348 (quotation omitted).

Respondent's reliance on *Ondler* is unpersuasive. There, the supreme court concluded that a prior version of the death-benefits statute, which categorically excluded death-benefit coverage for *all* deaths based on heart attacks, was unconstitutional because no rational basis existed to distinguish between officers who were killed by heart attacks and those who were killed in any other way. 289 N.W.2d at 488-90. That same constitutional infirmity does not exist in the current version of the statute.

The current death-benefits statute excludes deaths from natural causes but provides exceptions to that exclusion, allowing compensation for certain types of deaths if relevant conditions are met. In essence, there must be a close causal connection between the death and stressful, nonroutine work.⁶ This furthers the statute's purpose to provide benefits to public safety officers. Moreover, since the *Ondler* decision in 1980, the statute has been amended several times to provide broader coverage, including adding exceptions to the natural-deaths exclusion for deaths by heart attacks, strokes, and vascular ruptures, as well as accidents. Those changes to the statute are not "arbitrary or fanciful," but rather

⁶ *Kramer* and *Johnson* required a similar causal connection, though both cases focused on heart attacks. See *Kramer*, 380 N.W.2d at 502 (requiring that heart-attack death relate to "a duty peculiar to" employment); *Johnson*, 431 N.W.2d at 111 (syllabus) (requiring that heart attack be "suffered while engaged in the hazards" of being a peace officer); *id.* (excepting heart-attack deaths from natural-causes exclusion if "[peace-officer] efforts were a substantial contributing cause"). To the extent that respondent argues the statute violates equal protection because of its causal requirement, *Johnson* and *Kramer* would also violate equal protection for that same reason.

“genuine” and “relevant” to further the purpose of the law to provide coverage.⁷ *See Holloway*, 916 N.W.2d at 348 (quotation omitted).

Deputy Edeburn’s public service was certainly commendable. I agree with the majority that the legislature has revised the death-benefits statute numerous times to carefully and thoughtfully expand coverage. But it is not the role of this court to expand those exceptions beyond the plain language of the statute. Instead, we are required to follow the plain language of the statute if it is clear and unambiguous. The exclusion for deaths by natural causes from the definition of “killed in the line of duty” in Minn. Stat. § 299A.41, subd. 3, is plain and unambiguous. It is undisputed that Deputy Edeburn died of natural causes, so he falls within that exclusion, and he did not die of a heart attack, stroke, or vascular rupture, so he does not meet that exception or qualify for a presumption that he was nevertheless killed in the line of duty. It is also undisputed that Deputy Edeburn did not engage in nonroutine strenuous or stressful physical law-enforcement activities in the 24 hours preceding his death. As a result, I would conclude that the ALJ erred in its interpretation of Minn. Stat. § 299A.41, and I would reverse and remand.

⁷ This court in *Jones* rejected the same argument. *See* 2025 WL 2752621, at *6. There, we distinguished *Ondler* because it involved uncontradicted evidence that the firefighter had died while fighting a fire and a causal connection existed between the death and the stress from fighting the fire. *Id.* On the merits, we held that a rational basis existed for the distinction because “there is a close connection between unusual work-imposed stress and a heart attack suffered in close temporal relation to that work-imposed stress.” *Id.*