STATE OF MINNESOTA
IN COURT OF APPEALS
A24-1534

Masami Kiya, petitioner,
Respondent,

vs.

Randy Jackson, Jr.,
Appellant.

Filed May 27, 2025
Affirmed
Ross, Judge

Hennepin County District Court
File No. 27-FA-24-2109

Micaela Wattenbarger, Maenner Minnich PLLC, Minnetonka, Minnesota (for respondent)

Victoria J. Brenner, Seungwon R. Chung, Hannah S. Fereshtehkhou, Taft Stettinius & Hollister LLP, Minneapolis, Minnesota (for appellant)

Considered and decided by Ross, Presiding Judge; Frisch, Chief Judge; and Smith, Tracy M., Judge.

SYLLABUS

Because Japan has enacted a law and procedures "substantially similar" to the procedures set forth under Minnesota Statutes sections 518C.101–.905 (2024), a Japanese child-support order qualifies as a "foreign support order" that can be registered in Minnesota for enforcement purposes.

OPINION

ROSS, Judge

Randy Jackson Jr. moved to Japan to play professional baseball and fathered a child with Masami Kiya. Jackson left Japan about three years before signing a one-year contract to play for the Minnesota Twins, and Kiya meanwhile obtained a child-support judgment against Jackson in a Japanese family court. She registered the Japanese child-support judgment in Minnesota under the Minnesota Uniform Interstate Family Support Act. The district court denied Jackson's motion to vacate the registration, and Jackson now appeals that denial. We must decide whether Minnesota has the authority to register a Japanese child-support judgment for enforcement and whether Minnesota has personal jurisdiction over the obligor. Although the district court erroneously found that Jackson was properly served the underlying summons, we affirm because Jackson was subject to personal jurisdiction in Minnesota and the Japanese judgment qualifies under the Act as a "foreign support order" that can be registered in this state for enforcement purposes.

FACTS

Appellant Randy Jackson Jr. says he has had a "journeyman's career" as a baseball player, having played for six Major League Baseball teams and two professional Japanese teams over about a nine-year span. Jackson met respondent Masami Kiya in 2017 after moving to Japan to play for the Hiroshima Toyo Carp. He and Kiya began a romantic relationship and in 2018 their son was born. The couple's relationship deteriorated and they initiated a series of legal actions in Japan related to their son, including a child-support action that Kiya commenced in December 2019. Two years later, the Japanese family court

overseeing the child-support action entered judgment on an order obligating Jackson to pay Kiya child support.

In the period after that judgment, Jackson played for the San Francisco Giants, the Atlanta Braves, and the Toronto Blue Jays until February 2024, when he signed a one-year contract to play for the Minnesota Twins. At the end of March 2024, he signed a six-month lease for a Minneapolis apartment. And on April 4, Kiya registered the Japanese judgment in Hennepin County District Court under the Minnesota Uniform Interstate Family Support Act (MUIFSA), which is now codified at Minnesota Statutes sections 518C.101–.905 (2024).

The district court immediately issued a Notice of Registration of Foreign Order of Support and mailed the notice to Target Field, where the Twins play home games. Jackson discovered the notice on his chair at the stadium on April 19, 2024. A week later he filed a "Notice of Motion and Motion for Hearing and Contesting the Validity and Enforcement of Registration of Foreign Support Order." The motion asked the district court to vacate Kiya's registration of the Japanese judgment for failure to qualify as a foreign support order under MUIFSA, vacate the registration for failure to meet the registration requirements of MUIFSA, and dismiss "the petition and/or motion to enforce" the Japanese judgment for lack of personal jurisdiction over Jackson. The record does not indicate that, at the time Jackson filed this motion, Kiya had filed either a petition or a motion to enforce the Japanese judgment. Jackson also asserted that he was not waiving personal jurisdiction and, in his accompanying memorandum, argued that the Japanese judgment failed to qualify as a foreign support order because "Japan does not have 'substantially similar' child

support statutes with Minnesota." He also maintained that he was not a Minnesota resident and that he did not have the minimum contacts with Minnesota necessary for the state to exercise personal jurisdiction over him as a nonresident.

On July 26, 2024, the Twins released Jackson after he played 23 games, 13 occurring in Minnesota.

Kiya filed a responsive motion on July 29. She asked the district court to deny Jackson's motion and order that the Japanese order be afforded recognition and enforcement under MUIFSA. She asked alternatively that the district court apply the principles of comity and forward the proceedings to a tribunal in the state where Jackson resided if the court determined that it lacked personal jurisdiction over him. She simultaneously filed a "Petition for Recognition and Enforcement of a Foreign Support Order," asking for substantially the same relief as she had in her responsive motion.

Jackson asked the district court to dismiss Kiya's petition for lack of personal service, deny her request to forward the proceedings to another tribunal "for failure to properly initiate a proceeding," and deny her other requests. The district court conducted a hearing on the competing motions on August 19, immediately before which Jackson was personally served with Kiya's petition, but not with a summons. Jackson argued that service of process was invalid and, therefore, the district court lacked personal jurisdiction over him and any registered judgment would be unenforceable. Kiya argued that Jackson was subject to personal jurisdiction in Minnesota and also maintained that "neither personal service nor a petition [is] required under [M]UIFSA" to register a foreign order for recognition and enforcement.

The district court denied Jackson's motion and filed its "Order Affirming Registration of Foreign Support Order." It concluded that Jackson was subject to personal jurisdiction in Minnesota, that the Japanese judgment qualified as a foreign support order under MUIFSA, that the Japanese judgment could alternatively be recognized and enforced in Minnesota under the doctrine of comity, and that Kiya had followed the proper procedures for registering a foreign support order under MUIFSA. The district court ordered that the Japanese judgment "shall remain registered for enforcement purposes" in Minnesota. Kiya then filed a "Notice of Intent to Enter and Docket Child Support Judgment," and the district court entered and docketed judgment two days later.

Jackson appeals.

ISSUES

I. Are the district court's findings of fact clearly erroneous?

II. Did the district court err in exercising jurisdiction without personal service of a summons?

III. Did the district court err in concluding that Jackson was subject to personal jurisdiction in Minnesota?

IV. Did the district court err in concluding that the Japanese judgment could be registered and enforced in Minnesota?

ANALYSIS

Jackson challenges the district court's order affirming the registration of the Japanese judgment for enforcement purposes under MUIFSA. The purpose of the Uniform Interstate Family Support Act (UIFSA), which has been adopted in all 50 states, is "to unify state laws relating to the establishment, enforcement, and modification of child support

orders." *Kasdan v. Berney*, 587 N.W.2d 319, 322 (Minn. App. 1999); *Hennepin County v. Hill*, 777 N.W.2d 252, 254 (Minn. App. 2010). Minnesota adopted its version of the uniform act in 1996. *Wareham v. Wareham*, 791 N.W.2d 562, 564 (Minn. App. 2010). Under MUIFSA, a support order issued by the tribunal of a foreign country can be registered in Minnesota for enforcement. Minn. Stat. § 518C.601. Jackson argues that the district court erred in affirming registration of the Japanese judgment for enforcement by making clearly erroneous findings of fact, exercising jurisdiction without personal service of a summons, determining that Jackson is subject to personal jurisdiction in Minnesota, and determining that Minnesota has the authority to register and enforce the Japanese judgment under MUIFSA. We address each argument in turn.

I

We first address Jackson's argument that the district court issued unsupported jurisdictional findings of fact. We review the district court's fact findings for clear error. *Shamrock Dev., Inc. v. Smith*, 754 N.W.2d 377, 382 (Minn. 2008). Findings of fact are clearly erroneous "when they are manifestly contrary to the weight of the evidence or not reasonably supported by the evidence as a whole." *In re Civ. Commitment of Kenney*, 963 N.W.2d 214, 221 (Minn. 2021) (quotation omitted). Clearly erroneous findings are those that leave us convinced that there are mistakes. *Id.* On that standard, Jackson persuasively challenges one of the district court's findings.

Jackson maintains that the district court clearly erred by finding that he had been personally served with a summons. The affidavit of service lists the petition as the only document served on Jackson the day of the hearing. The record includes no reference

indicating that Jackson was personally served with a summons, and Kiya concedes on appeal that she never served Jackson with a summons. The district court's finding on personal service of a summons lacks any record support and is therefore manifestly contrary to the evidence. We discuss the significance of the error in the next section.

Jackson also contends that the record does not support the findings bearing on Jackson's Minnesota contacts, which led the district court to conclude that Minnesota may exercise personal jurisdiction over him. The district court found specifically that Jackson had "transacted regular and on-going business" in Minnesota; resided in an apartment in Minnesota; had an employment relationship with a Minnesota corporation; had "regular, ongoing contact with Minnesota via remote communication"; attended meetings in Minnesota; and "spent time in Minnesota for business purposes, practices, and home games." We are satisfied that the record adequately supports these findings. Affidavits provided by Jackson establish that he was employed by the Minnesota Twins from February 2024 to July 2024, practiced and played games in Minnesota, and rented an apartment in Minnesota. It is true that the record includes no evidence expressly declaring that Jackson "attended meetings in Minnesota" or engaged in "regular, ongoing contact with Minnesota via remote communication," leaving us to understand that these findings were based on inferences drawn by the district court. But the district court's other jurisdictional findings have clear support in the record. The record includes evidence that Jackson established employment contacts in Minnesota and participated in ongoing team activities in the state. The consequent findings are reasonably supported by the evidence as a whole and therefore are not clearly erroneous.

II

Jackson next argues that, because Kiya never personally served him with a summons, the district court erroneously exercised personal jurisdiction over him. Whether service of process was effective and whether personal jurisdiction consequently exists are both questions of law subject to our *de novo* review. *Shamrock*, 754 N.W.2d at 382. We must interpret and apply MUIFSA and the Minnesota Rules of Civil Procedure to resolve these issues, and this also calls for *de novo* review. *In re Welfare of S.R.S.*, 756 N.W.2d 123, 126 (Minn. App. 2008), *rev. denied* (Minn. Dec. 16, 2008); *Melillo v. Heitland*, 880 N.W.2d 862, 864 (Minn. 2016). We consider in turn Jackson's contentions that MUIFSA and the Minnesota Rules of Civil Procedure independently required Kiya to personally serve him with a summons.

Jackson argues that, under MUIFSA, "the summons, not the petition, invokes jurisdiction" in a child-support enforcement action. He cites the statute's long-arm provision, Minnesota Statutes section 518C.201, to contend that personal service of "a summons or comparable document" is necessary to establish jurisdiction. And he concludes that, because he was never served with a summons or comparable document, the district court could not properly exercise jurisdiction over him. The argument fails.

Contrary to Jackson's contention that service of a summons is necessary to establish personal jurisdiction, service of a summons is only one of eight possible bases for personal jurisdiction under MUIFSA's long-arm provision:

> (a) In a proceeding to establish or enforce a support order or to determine parentage of a child, a tribunal of this

> state may exercise personal jurisdiction over a nonresident individual or the individual's guardian or conservator if:
>
> (1) the individual is personally served with a summons or comparable document within this state;
>
> (2) the individual submits to the jurisdiction of this state by consent, by entering a general appearance, or by filing a responsive document having the effect of waiving any contest to personal jurisdiction;
>
> (3) the individual resided with the child in this state;
>
> (4) the individual resided in this state and provided prenatal expenses or support for the child;
>
> (5) the child resides in this state as a result of the acts or directives of the individual;
>
> (6) the individual engaged in sexual intercourse in this state and the child may have been conceived by that act of intercourse;
>
> (7) the individual asserted parentage of a child under sections 257.51 to 257.75; or
>
> (8) there is any other basis consistent with the constitutions of this state and the United States for the exercise of personal jurisdiction.

Minn. Stat. § 518C.201 (a)(1)–(8). The legislature's use of "or" matters here because that conjoining term "is typically read as disjunctive." *State v. Bakken*, 883 N.W.2d 264, 268 (Minn. 2016). The legislature's disjunctive presentation of the listed circumstances establishing personal jurisdiction belies Jackson's proposition that only the service of summons could support the district court's exercising of jurisdiction over him. Properly construed, the statute informs us that personal service of "a summons or comparable document within this state" is sufficient, but not necessary, to establish personal jurisdiction.

Jackson contends relatedly that Minnesota Rule of Civil Procedure 4, which prescribes the contents a summons must include and the method of its service, requires us to reverse the order denying his motion to dismiss for lack of personal service. Because the

rules of civil procedure govern the procedure "in all suits of a civil nature," Minn. R. Civ. P. 1, and "[a] civil action is commenced against [a] defendant . . . when the summons is served upon that defendant," Minn. R. Civ. P. 3.01, Jackson's contention first faces the threshold issue of whether the proceeding here was a civil action, as opposed to merely an administrative action in which service of summons is unnecessary. *See In re Skyline Materials, Ltd.*, 835 N.W.2d 472, 476 (Minn. 2013) (observing that a "civil action" is "any judicial proceeding, which, if conducted to a determination, will result in a judgment or decree" and concluding that a proceeding before a county board was "not a judicial proceeding and so [was] not a 'civil action' within the meaning of the Rules of Civil Procedure" (quotation omitted)). Jackson argues that, because the district court made judicial determinations about both registration *and* enforcement, the proceedings constituted a civil action requiring personal service of a summons.

Jackson's threshold argument fails. This is because registering a foreign support order under MUIFSA—as opposed to enforcing a foreign support order—is an administrative action distinct from a judicial action. We have previously held that "a request for registration of a foreign support order is distinct from, and does not constitute, a petition for enforcement." *Kasdan*, 587 N.W.2d at 323. And the statute outlining the process to register a foreign support order in Minnesota includes only "sending [specified] documents to the registering tribunal." Minn. Stat. § 518C.602(a). Jackson maintains that the distinction between a registration action and an enforcement action is illusory here because he was subject to an enforcement action. The record does not support his assertion. Kiya's initial registration request did not include a request for enforcement. Her petition

also did not request enforcement. And during the motion hearing, Kiya maintained that she had not yet "requested any specific enforcement relief." The district court's decision tracked Kiya's limited objective. Its order is styled as an "Order Affirming Registration of Foreign Support Order" and states that the order "shall remain registered for enforcement purposes" in Minnesota. Because Kiya sought only to register the order and the district court's order tracks that request without authorizing enforcement, we hold that the proceeding constituted an administrative action, which did not require service of a summons.

We add that Jackson's no-service-of-a-summons argument would fail, based on forfeiture, even if we concluded that the rules of civil procedure required the service of a summons. A party forfeits the defense of insufficient service of process if he omits the defense from his answer or from a motion to dismiss. *Patterson v. Wu Fam. Corp.*, 608 N.W.2d 863, 866–67 (Minn. 2000) (citing Minn. R. Civ. P. 12.08(a)). Jackson filed a motion after he received the notice of registration, raising various issues but not insufficient service of process. He asked the district court to dismiss the action for lack of personal jurisdiction with no reference to service of process. He contested whether the Japanese judgment qualifies as a foreign support order under MUIFSA, whether Kiya had met MUIFSA's procedural registration requirements, and whether the district court should stay enforcement pending additional evidence. He also generically added a request for "further relief the [district court] deems as just and equitable." The omission continued; Jackson supported his motion with a memorandum of law in which he did not argue for dismissal based on insufficient service of process. Because Jackson failed to raise the defense of

insufficient service of process in his motion to dismiss, he forfeited the defense. *See id.* It is true that he eventually moved to dismiss for insufficient service of process, but even then, he moved to dismiss only the petition for insufficient service of process, not the action in its entirety. Jackson forfeited the defense of insufficient service of process.

In summary, because section 518C.201 does not require service of a summons to invoke personal jurisdiction and a foreign-judgment-registration proceeding is an administrative action that does not require service of a summons, and alternatively because Jackson forfeited the defense of insufficient service of process, Jackson's no-service-of-a-summons argument fails.

III

Jackson maintains that the district court erroneously denied his motion to dismiss for lack of personal jurisdiction. Because personal jurisdiction is not required for registration of a foreign support order under MUIFSA, we question whether the issue of personal jurisdiction is properly before us. MUIFSA does not expressly require personal jurisdiction for either registration or enforcement, and Kiya has not petitioned for any modification (or, for that matter, any specific enforcement relief). As stated in the official comment to section 611 of the 2001 version of UIFSA, "Because the obligor already has had a day before an appropriate tribunal, an enforcement remedy may be summarily invoked." Unif. Interstate Family Support Act § 611 cmt. (amended 2001), 9 pt. IB U.L.A. 468 (2019). But we will address the issues as framed and assume for our purposes that personal jurisdiction was necessary. Based on our *de novo* review of whether personal jurisdiction existed, *see Juelich v. Yamazaki Mazak Optonics Corp.*, 682 N.W.2d 565, 569

(Minn. 2004), we are satisfied that, based on the circumstances as they existed when Kiya registered the order on April 4, 2024, the district court had personal jurisdiction over Jackson.

We consider whether personal jurisdiction existed by applying the constitutional, due-process framework. Minnesota's long-arm statute allows the state to exercise personal jurisdiction over even a nonresident defendant unless doing so "would violate fairness and substantial justice." Minn. Stat. § 543.19 (2024). That is, the statute "extends the personal jurisdiction of Minnesota courts as far as the Due Process Clause . . . allows." *Rilley v. MoneyMutual, LLC*, 884 N.W.2d 321, 327 (Minn. 2016) (quotation omitted). We may therefore apply federal case law to determine whether personal jurisdiction exists. *Valspar Corp. v. Lukken Color Corp.*, 495 N.W.2d 408, 411 (Minn. 1992). And under that case law, the Fourteenth Amendment's Due Process Clause allows a state to exercise personal jurisdiction if the defendant has "minimum contacts" with the state and maintaining the lawsuit "does not offend traditional notions of fair play and substantial justice." *Int'l Shoe Co. v. Washington*, 326 U.S. 310, 316 (1945) (quotation omitted). A nonresident defendant has the requisite "minimum contacts" supporting personal jurisdiction if he "purposefully avails [himself] of the privilege of conducting activities within the forum State, thus invoking the benefits and protections of its laws" so that he might "reasonably anticipate being haled into court there." *Burger King Corp. v. Rudzewicz*, 471 U.S. 462, 474–75 (1985). We assess whether, "taking all the factual allegations in the complaint and supporting affidavits as true, the plaintiff has made a prima facie showing of personal jurisdiction." *Rilley*, 884 N.W.2d at 326. If a defendant files an affidavit supporting his

motion to dismiss, as Jackson did, "the plaintiff must allege specific evidence showing personal jurisdiction beyond general statements in the pleadings." *Young v. Maciora*, 940 N.W.2d 509, 514 (Minn. App. 2020), *rev. denied* (Minn. May 19, 2020). We resolve any doubts in close cases to favor retaining jurisdiction. *Valspar Corp.*, 495 N.W.2d at 411–12. So framed, Jackson's personal-jurisdiction challenge fails.

Of the two types of personal jurisdiction—general and specific—Jackson maintains that he was subject to neither. The nature and quality of the contacts necessary to establish personal jurisdiction varies depending on which type of jurisdiction is asserted. *Juelich*, 682 N.W.2d at 570 n.3. General personal jurisdiction exists if the defendant has had "continuous and systematic" contacts with the forum state, even if those contacts are unrelated to the cause of action. *Helicopteros Nacionales de Colombia, S.A. v. Hall*, 466 U.S. 408, 414–16 (1984). By contrast, specific jurisdiction exists when the current litigation arises out of or relates to the defendant's contacts with the forum state. *Burger King*, 471 U.S. at 472–73, 473 n.15. The record satisfies us that Jackson was subject to the district court's exercise of general personal jurisdiction.

Jackson's residence in Minnesota, although it did not last long because his employment ended, meets the general-jurisdiction standard. The Supreme Court has said that, in the "paradigm" case, a person is subject to general jurisdiction in his place of "domicile." *Daimler AG v. Bauman*, 571 U.S. 117, 137 (2014). General jurisdiction exists when the defendant's affiliations in the forum state are so continuous and systematic that he is "essentially at home" there. *Id.* at 133 n.11; *see also Goodyear Dunlop Tires Operations, S.A. v. Brown*, 564 U.S. 915, 924 (2011). And an individual's domicile state

is the one where he is "physically present" and where he intends "to make his home . . . indefinitely." *Yeldell v. Tutt*, 913 F.2d 533, 537 (8th Cir. 1990). Although the district court did not use the word "domicile" and made no express finding that Jackson had intended to make Minnesota his home indefinitely, it did find that Jackson "stayed in [an] apartment in Minnesota during the relevant time period," or more specifically, that he "resided in an apartment in Minnesota during that time." And it concluded that Jackson's circumstances met the general-jurisdiction standard.

Although whether a person is domiciled in the forum state is "ordinarily a question of fact," *Mauer v. Comm'r of Revenue*, 829 N.W.2d 59, 63 (Minn. 2013), Jackson asks us to consider the district court's personal-jurisdiction determination *de novo*. He argues that the district court erred as a matter of law by wrongly placing the burden of showing no personal jurisdiction on him rather than placing burden of showing personal jurisdiction on Kiya, by concluding that general jurisdiction existed without finding that "Jackson intend[ed] to remain in Minnesota permanently," and by exercising personal jurisdiction when the "lack of intent makes domicile [in Minnesota] impossible." We will confine our review of the district court's personal-jurisdiction determination based on Jackson's specific arguments.

Jackson accurately identifies the district court's observation that it was "because [Jackson] provided insufficient information to determine if he is a resident of another state" that the district court had difficulty determining whether Jackson had been a Minnesota resident. But we do not read the district court's order as placing on Jackson the burden to disprove personal jurisdiction. Based on evidence that Kiya presented, the district court

found that Jackson had, in fact, "resided in an apartment in Minnesota" while he was contracted to play baseball for the Twins—a finding that the district court relied on to conclude that jurisdiction existed under Minnesota's long-arm statute. We are not persuaded to reverse by Jackson's assertion that the district court misallocated the burden of proof.

Jackson also accurately describes the district court's order as having failed to make a finding that Jackson intended to reside in Minnesota "permanently." But an individual's domicile state does not depend on him intending to live there "permanently"; again, it depends instead on him intending only to live there "indefinitely." *Yeldell*, 913 F.2d at 537. And the record reflects that Jackson had signed both a one-year contract to play baseball for the Twins and a six-month lease to live in a Minneapolis apartment. We recognize that this case lacks some of the usual evidence of domicile, like evidence that the forum state is where the defendant exercised civil and political rights, paid taxes, obtained licenses, and owned property. *See Wagstaff & Cartmell, LLP v. Lewis*, 40 F.4th 830, 839–40 (8th Cir. 2022). But the lack of this sort of typical evidence of domicile can be understood as the result of Jackson's atypical lifestyle as a professional athlete implicitly endeavoring to secure a long-term Major League Baseball contract in each state where he begins with only a short-term place on the roster. The evidence of Jackson's Minnesota-based employment as a professional athlete and his renting a Minnesota residential unit demonstrates his intent to remain in the state indefinitely. This rationale supports the implicit finding that Jackson planned to continue living in Minnesota indefinitely as a member of the Twins, disposing of Jackson's contention that the "lack of intent makes domicile [in Minnesota] impossible."

The admittedly thin circumstances indicating Minnesota as Jackson's domicile at the relevant point when the action commenced have no competition. An individual can have only one domicile at any time, *Sanchez v. Comm'r of Revenue*, 770 N.W.2d 523, 526 (Minn. 2009), and the record includes no evidence of any real alternative to Minnesota. Jackson offered only South Carolina or Utah, quite tepidly, as alternatives to Minnesota, but his affidavit support for either of them was conspicuously sparse. Kiya accurately complained that Jackson "provided no information about where his residence is, if not Minnesota," and that he offered "no documentation of real estate owned elsewhere, no documentation of a current driver's license in another state – no documentation at all of [his] residence in a state other than Minnesota." In the affidavit he filed to challenge personal jurisdiction after he was released from the Twins, Jackson contested the idea that he had been domiciled in Minnesota by asserting that he lacked a Minnesota driver's license, had not claimed permanent residence in Minnesota, and had planned to stay in Minnesota only "temporarily." But an intent to stay "temporarily" is not inconsistent with an intent to stay indefinitely, and Jackson did not assert that, before he was released by the Twins, he had planned to leave the state at any point.

Jackson's affidavit testimony in fact suggests that he left Minnesota only because he lost his position with the Twins, a position that the record reasonably implies Jackson hoped and intended to maintain indefinitely. The affidavit said, "I was always here temporarily and relatively infrequently *until I finished my contract with the Twins*." (Emphasis added.) He explained, "*Now that the Twins have cut me*, I'm no longer employed by a Minnesota company." (Emphasis added.) He elaborated, "*Since losing my*

job [with the Twins] last month, I'd planned to terminate my short-term lease . . . and either spend time in Utah with my fiancée and son . . . or go home to South Carolina, where I grew up and went to college." (Emphasis added.) This testimony that his termination from the Twins was the event that left him contemplating whether he would "spend time" in one state "or go home" to another state "where [he] grew up and went to college" supports—rather than contradicts—the conclusion that when Kiya commenced the action, Jackson had been physically present in Minnesota and intended to make the state his home for the indefinite future.

We add that even if Jackson had presented more concrete testimony representing Utah or South Carolina as alternatives to Minnesota, the district court would not have been bound to accept the testimony. Although an individual's self-serving statements can be relevant to determine domicile, they are due little weight where, as here, they are contradicted by the defendant's course of conduct and outweighed by competing evidence. *See Texas v. Florida*, 306 U.S. 398, 425 (1939); *In re Smith's Est.*, 64 N.W.2d 129, 132 (Minn. 1954) (explaining that, in determining an individual's intention to change domicile, "[a]cts are generally regarded as more important than declarations"); *Altimore v. Mount Mercy Coll.*, 420 F.3d 763, 769 (8th Cir. 2005). Jackson's equivocal, subjective suggestion that some never-clearly-identified state other than Minnesota was his domicile is no basis for us to reverse the district court's exercise of personal jurisdiction.

IV

Jackson argues alternatively that Minnesota lacks authority to register and enforce the Japanese judgment because the judgment does not qualify as a "foreign support order"

under MUIFSA. We review *de novo* the district court's interpretation of a statute. *Buzzell v. Walz*, 974 N.W.2d 256, 261 (Minn. 2022). MUIFSA provides that a "foreign support order may be registered in this state for enforcement." Minn. Stat. § 518C.601. A "foreign support order" is defined as "a support order of a foreign tribunal." Minn Stat. § 518C.101(f). As relevant here, a "foreign tribunal" includes a court of a foreign country authorized to establish or enforce a support order. *Id.* (g). A "foreign country," in turn, is defined as follows:

> (e) "Foreign country" means a country, including a political subdivision thereof, other than the United States, that authorizes the issuance of support orders and:
>
> (1) that has been declared under the law of the United States to be a foreign reciprocating country;
>
> (2) that has established a reciprocal arrangement for child support with this state as provided in section 518C.308;
>
> (3) that has enacted a law or established procedures for the issuance and enforcement of support orders which are substantially similar to the procedures under this chapter; or
>
> (4) in which the convention is in force with respect to the United States.

Id. (e)(1)–(4). The parties accurately understand that only section 518C.101(e)(3) applies here. But contrary to Jackson's contention, we conclude that Japan has enacted laws or procedures that are "substantially similar" to the procedures set forth in MUIFSA.

Neither MUIFSA nor any precedential Minnesota case outlines what constitutes "substantially similar" laws or procedures under MUIFSA. But the Act's plain terms are clear enough for our decision. And the plain terms lead to a conclusion that is buttressed by the reasoning of caselaw of jurisdictions that have interpreted the same language in their own version of UIFSA. *See Hill*, 777 N.W.2d at 257 ("[B]ecause uniform laws should be

interpreted to effect their general purpose to make uniform the laws of those states that enact them[,] . . . we give great weight to other states' interpretations of a uniform law." (quotations omitted)); *see also* Minn. Stat. § 645.22 (2024) ("Laws uniform with those of other states shall be interpreted and construed to effect their general purpose to make uniform the laws of those states which enact them."). Our reading of the statute and the reasoning of other jurisdictions lead us to reject Jackson's contention that the Japanese judgment is not a foreign support order.

Consistent with MUIFSA's plain language, other courts have recognized that a state is authorized to register the foreign judgment only if that foreign forum "has laws or procedures that allow for a foreign judgment to be recognized, *i.e.*, laws on reciprocity, and that those laws are 'substantially similar'" to the forum state's version of UIFSA. *See Gonzales-Alpizar v. Griffith*, 317 P.3d 820, 825 (Nev. 2014); *see also Haker-Volkening v. Haker*, 547 S.E.2d 127, 131 (N.C. Ct. App. 2001) ("UIFSA requires that a foreign nation must have substantially similar law or procedures to UIFSA (that is, reciprocity) in order for its support orders to be treated as if they had been issued by a sister State." (quotation omitted)). What matters is not whether Japan has laws and procedures that are substantially similar to Minnesota's substantive support laws but whether Japan has laws and procedures for recognition and enforcement that are substantially similar to the procedures set forth in MUIFSA. *See Cima-Sorci v. Sorci*, 225 Cal. Rptr. 3d 813, 821–22 (Cal. Ct. App. 2017) (explaining that whether a foreign jurisdiction's substantive support laws are similar to the substantive support laws of the responding tribunal is irrelevant for purposes of conducting

a substantially-similar analysis); *Gonzales-Alpizar*, 317 P.3d at 825. The Japanese judgment qualifies as a foreign support order under this framework.

Japan has enacted a law that allows for recognition and enforcement of foreign judgments. Under Article 118 of the Japanese Code of Civil Procedure, "[a] final and binding judgment rendered by a foreign court is valid" if it meets all the following requirements:

> (i) the jurisdiction of the foreign court is recognized pursuant to laws and regulations, conventions, or treaties;
> (ii) the defeated defendant has been served (excluding service by publication or any other service similar thereto) with the requisite summons or order for the commencement of litigation, or has appeared without being so served;
> (iii) the content of the judgment and the litigation proceedings are not contrary to public policy in Japan;
> (iv) a guarantee o[f] reciprocity is in place.[1]

The existence and content of Article 118 establish that Japan has enacted the requisite "laws on reciprocity" for recognizing and enforcing foreign judgments. Regarding whether the procedures themselves are substantially similar, both Minnesota and Japan will recognize a foreign support order if the foreign tribunal issuing the order provided the obligor with due process and the foreign tribunal has enacted substantively similar laws of reciprocity. The substantial-similarity test is met here.

Jackson argues unconvincingly that the procedures for recognition and enforcement of a foreign support order in Japan are not substantially similar because "Japan shares no

[1] The relevant text of the Japanese code, quoted here, was established by expert-witness evidence and relied on by the parties in the district court, and it is substantively the same as the apparently official printed translation. *See* Minji soshōhō [Minsohō] [C. Civ. Pro.] 1996, art. 118, paras. 1–4.

reciprocal enforcement mechanisms." He cites section 518C.307(e), which provides that "[a] support enforcement agency of this state shall request a tribunal of this state to issue a child support order and an income-withholding order . . . if requested to do so by a support enforcement agency of another state." And he contends that, because Japan does not provide for income-withholding, its laws and procedures do not meet the substantial-similarity requirement. Jackson appears to be correct that Japan does not provide for income withholding as a method of enforcement. But this difference is not sufficient to defeat registration. We agree with the district court's observation that the two systems "do not need to be identical" to be substantially similar. And the district court found that Japan "does provide for some enforcement" of its child-support orders. An affidavit submitted by an expert retained by Jackson implicitly supports the finding, as the expert recognized that "[under] Japanese child support law, parents do not have *many tools* to enforce the payment of child support." (Emphasis added.) The district court had a sufficient basis to conclude that Japan does have *some* tools to enforce child-support obligations.

Because Japan's laws and procedures for issuing and enforcing support orders are substantially similar to the procedures established by MUIFSA, the Japanese judgment qualifies as a foreign support order that may be registered in Minnesota for enforcement purposes. Because we conclude that Minnesota was authorized to register the Japanese judgment as a foreign support order, we need not reach Kiya's alternative argument that Minnesota can recognize the Japanese judgment under the doctrine of comity.

DECISION

Jackson was subject to personal jurisdiction in Minnesota because he was domiciled in Minnesota at the time Kiya commenced the administrative action for the district court to register the Japanese judgment. Minnesota was authorized to register the Japanese judgment because it qualified as a foreign support order under MUIFSA. The district court therefore did not erroneously register the Japanese judgment.

Affirmed.