

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF RAMSEY

SECOND JUDICIAL DISTRICT

CASE TYPE: CIVIL/OTHER

Paul Wikstrom,

Court File No. 62-CV-24-7378

Contestant,

v.

DECLARATION OF CURTIS JOHNSON

Curtis Johnson,

Contestee.

I, Curtis Johnson, hereby declare as follows:

1. I am the Representative-Elect for Minnesota House District 40B. I won the November 5, 2024 General Election with over 65 percent of the vote. I am the Contestee in this matter. I submit this Declaration in further support of Motion to Dismiss.

2. In January 2024, I registered a political committee, Curtis Johnson for MN House, in support of my candidacy for election to the open seat in District 40B.

3. On March 5, 2024, I signed a lease with Rosedale Estates at 2735 Rice Street in Roseville, Minnesota, for Apartment 103A.

4. I moved into the Apartment the week of March 5, 2024, and have lived at Rosedale Estates ever since.

5. In March 2024, I changed my driver’s license to the Roseville address.

6. The property was undergoing extensive construction at the time I moved in, and as a result, all electricity was being handled through the main building, and there was no individual electric meter for my apartment.

7. I did not set up internet in my apartment because I usually work from my office or

a coffee shop.

8. My apartment had two windows facing the kitchen. Those lights were rarely on during the campaign season, because I would normally work, door knock, and come home to sleep, without turning the kitchen lights on. The other lights in the apartment were not visible through those windows.

9. Construction at Rosedale Estates caused a number of maintenance issues within my apartment, requiring me to initiate maintenance requests as follows:

- a. On May 4, 2024, my kitchen sink flooded
- b. On May 10, 2024, my kitchen sink clogged
- c. On June 9, 2024, my bathroom flooded
- d. On July 16, 2024, my kitchen sink flooded again
- e. On October 10, 2024, sewage flooded from my bathroom

10. After the October 10, 2024, event, Rosedale Estates gave me the option to move into Apartment 303, upstairs, with the option to stay in 303 because of the number of maintenance issues in Apartment 103.

11. On October 15, 2024, I moved my belongings to Apartment 303.

12. My lease has not been updated, but the Apartment provided a letter verifying this move. A true and correct copy of that letter is attached as Exhibit A.

13. My wife and I own a house in Little Canada. When I moved to Roseville, my wife continued to reside in Little Canada, as we prepared to sell the house and search for a home within the district.

14. In working with our realtor, we discovered we needed to do some maintenance and upkeep before putting the Little Canada house on the market, including, cleaning and repainting

the deck, replacing our roof, replacing the carpet, fixing the electrical system, and various other items, which are underway.

15. We ordered a moving POD to start moving and storing larger items, as we prepared the house to sell.

16. With the assistance of our realtor, we began looking for houses within the district, beginning in February 2024. Our search was slow to begin, but as interest rates came down, we began to see more houses that we liked. We put an offer on one house in the district, but we were outbid. We continue to look for a house within the district.

17. I visited the Little Canada house regularly, particularly early in the morning, between 5 and 5:30am, to see my wife and walk our dogs. I would also go to the house for dinner to see my wife and our adult child, who was home for the summer.

18. My blue car was parked at the Little Canada house for certain extended periods of time while we took some family vacations, including:

- a. From May 17 to May 19, when we drove a different car to Lincoln, Nebraska, for our child's graduation.
- b. From September 18 to September 28, when we rented a car to take our child to Oregon.

19. I registered to vote and voted from my Roseville address for the primary and general elections.

I declare under penalty of perjury that everything I have stated in this document is true and correct. Minn. Stat. § 358.116.

Executed this 27th day of November, 2024, in Ramsey County, Minnesota.


Signed by:

2F0384D298CA423...
Curtis Johnson

EXHIBIT A



11/11/2024

RE: Transfer Due to Construction

To whom it may concern,

Curtis Johnson Currently lives at Rosedale Estates at 2735 Rice Street #103, due to construction and some demolition projects we had to move Curtis to apartment #303 on October 15th 2024 – he is now physically occupying apartment #303 and we are currently working on the backend with compliance to transfer his lease to the new unit. As of now all bills and utilities are billed to apartment 103 until we are able to make that switch.

I will also mention that due to our construction, we have removed the electrical meters as they were in an area that was demolished and we are currently awaiting the new smart meters which are on back order. Due to this all electric services are being billed to Rosedale Estates as there is no way to bill back the unit.

Please let me know if you have any additional questions or concerns.

Thank you,



Megan Allyn
Property Manager
Rosedale Estates
651-483-3092

Account Information

Rosedale Estates Office
2835 Rice St
Roseville, MN 55113

Name	CURTIS JOHNSON
Service Address	2735 Rice Street
RES ID	3567479
Due Date	12/01/24
Total Due	\$27.94
Amount Paid	\$

Please make checks payable to:

CURTIS JOHNSON
2735 RICE STREET
APT 0103
ROSEVILLE, MN 55113 2203

Rosedale Estates Office
2835 Rice St
Roseville, MN 55113

REGULAR BILL

Service Addr: 2735 Rice Street, Apt 0103, Roseville, MN

Billing Period 10/01/24 - 10/31/24 = 31 Days

RESIDENT	UNIT	COMMUNITY	RESIDENT ID	STATEMENT DATE	SECURITY CODE
Curtis Johnson	103	rose01	3567479	11/07/24	1-3567479-M5VA

CONSERVATION SUGGESTIONS:**IN THE BATHROOM**

- *Report any leaks immediately to your property manager
- *Never put water down the drain when there may be another use for it such as watering a plant or garden, or cleaning
- *Avoid flushing the toilet unnecessarily. Dispose of tissues, insects and other such waste in the trash rather than the toilet
- *Use the minimum amount of water needed for a bath by filling the tub 1/3 full
- *Shorter showers save both water and energy
- *Save 5 gallons every day by turning off the faucet while brushing your teeth

IN THE KITCHEN

- *Wash dishes by hand if you only have a few dishes
- *Store drinking water in the refrigerator rather than running the water until its cold

MESSAGES:

Visit www.banyanutility.com

For questions or inquiries regarding your invoice or your account please contact BANYAN Resident Customer Service (800) 501-6820 or info@banyanutility.com

UTILITY CHARGES DETAIL

Description	Start Date	End Date	Days	Amount
Water	10/01/24	10/31/24	31	\$8.90
Sewer	10/01/24	10/31/24	31	\$15.10
Service Charge	10/01/24	10/31/24	31	\$3.94
CURRENT CHARGES				\$27.94
AMOUNT DUE				\$27.94

As of April 8, 2024, Multifamily Utility Company has become "Banyan Utility".

CUSTOMER SERVICE INFORMATION:

Utility charges should be paid with your monthly rental payment. If you need help setting up electronic payment, please see your Property Manager.

This is not from your local utility provider. Billing services provided by Banyan Utility Company.