

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF HENNEPIN

FOURTH JUDICIAL DISTRICT

 Ronald Peterson; John Tschohl; Laverne
Turner; Mary Holmberg,

Petitioners,

v.

 Jacob Frey, in his official capacity as
Mayor of Minneapolis,

 Respondent.

Court File No. _____

**PETITION FOR A WRIT OF
MANDAMUS**

1. In *Spann v. Minneapolis City Council*, the Minnesota Supreme Court definitively established that the Mayor of Minneapolis has a clear legal duty to “actually employ 731 officers” under section 7.3 of the Minneapolis City Charter. 979 N.W.2d 66, 77-78, n.9 (Minn. 2022). The Supreme Court upheld the alternative writ of mandamus issued by this Court on July 1, 2021. *Id.* at 79; *see also Spann v. Minneapolis City Council*, 27-CV-20-10558, Doc. 51 (Minn. Dist. Ct. July 1, 2021). The Mayor remains bound by that holding: he must actually employ 731 sworn police officers.

2. For the entire four-and-a-half years since the Supreme Court’s decision, the Mayor has completely failed to fulfill that duty. There has not been a single day for that entire time in which the Mayor has even come close to employing the minimum number of sworn officers commanded by the City Charter, confirmed by this Court, and affirmed by the Minnesota Supreme Court. Indeed, for the past four years, the Minneapolis Police Department has continuously been more than 100 officers short of the legal minimum established by the Supreme Court. And as of today, the Mayor employs fewer sworn police officers than when this Court issued its alternative

writ of mandamus against him over 56 months ago.

3. Since the Mayor has blatantly refused to fulfill the decisions of this Court and the Supreme Court Petitioners seek a preemptory writ to enforce their rights under the Charter to a fully staffed police force to protect their persons and property.

4. It is long past time for the Mayor to fulfill his unqualified duty to employ the Minneapolis Police. The Court should issue a writ of mandamus to vindicate the Supreme Court's decision and require the Mayor to do his job.

PARTIES

5. Petitioner Ronald Peterson is a resident and taxpayer of Minneapolis, Minnesota and Hennepin County. Declaration of Ronald Peterson ¶¶3-4.

6. Petitioner John Tschohl is a resident and taxpayer of Bloomington, Minnesota and Hennepin County. Mr. Tschohl owns ten properties in the City of Minneapolis that he rents to twenty-four tenants and for which he pays property taxes. Declaration of John Tschohl ¶¶2-7, 18.

7. Petitioner Laverne Turner is a resident and taxpayer of Minneapolis, Minnesota and Hennepin County. Declaration of Laverne Turner ¶¶5, 44.

8. Petitioner Mary Holmberg is a resident and taxpayer of Columbia Heights, Minnesota and Hennepin County. Mrs. Holmberg owns a property in the City of Minneapolis for which she and her husband pay property taxes. Declaration of Mary Holmberg ¶¶2-4, 13.

9. Respondent Mayor Jacob Frey is the Mayor of Minneapolis. His office is located at Minneapolis City Hall, 350 S. Fifth St., Room 330, Minneapolis, MN 55415.

JURISDICTION AND VENUE

10. The Court has jurisdiction over this petition pursuant to Minn. Stat. §586.11.

11. Venue is proper in this Court because the Defendants are located in Hennepin

County, Minnesota.

FACTS

The Mayor must employ at least 731 sworn police officers in Minneapolis

12. Pursuant to Section 7.3(a) of the Minneapolis City Charter, the Mayor has “complete power over the establishment, maintenance, and command of the police department.”

13. This “absolute control or authority” over the Minneapolis Police Department includes “the power to hire police department employees.” *Spann*, 979 N.W.2d at 73-74.

14. “This hiring power resides only in the Mayor and, in some limited cases, in the department itself—which the Mayor has ‘complete power’ over.” *Id.* at 74 (quoting Minneapolis Charter §7.3(a)).

15. “[T]he Charter was amended in 2013 and [] those amendments became effective in 2015.” *Spann*, 979 N.W.2d at 69.

16. Prior to a “non-substantive amendment” in 2013, the Charter “specifically required that ‘[t]he personnel of the police department shall be established and maintained at a ratio, or as closely thereto as is possible within the limits of section 2 hereof, of not less than one and seven-tenths (1.7) employees per one thousand (1,000) of’ the City’s population based on ‘the latest United States official census.’” *Id.* at 76 (quoting Minneapolis Charter Ch. 6, §1 (Dec. 15, 2014)).

17. As the Supreme Court held in 2022, this mandate remained unchanged after “non-substantive updates” to the City Charter in 2013, and the Mayor remains under this legal duty to employ the number of police required by this formula. *Spann*, 979 N.W.2d at 76-77.

18. Therefore, “based on the 2020 U.S. Census,” “the Mayor has a clear legal duty to employ 731 officers.” *Id.* at 77.

19. Moreover, the Minnesota Supreme Court held that “there is no discretion in the

required end result:” the Mayor *must* hire and employ at least the minimum number of police officers commanded by the City Charter. *Id.* at 79.

20. Based on this clear legal duty, on July 1, 2021, this Court issued an alternative writ of mandamus against the Mayor and commanded him to “comply with the required acts in the Alternative Writ, or show cause before this Court why [he has] not done so, on or about June 20, 2022, or a date mutually agreed-upon by the parties, at Hennepin County Government Center, Minneapolis, Minnesota.” *Spann v. Minneapolis City Council*, 27-CV-20-10558, Doc. 51 at 24 (Minn. Dist. Ct. July 1, 2021).

21. The petitioners in that case served the alternative writ of mandamus on the Mayor on July 6, 2021. *Id.*, Doc. 52.

22. The Minnesota Supreme Court affirmed this Court’s issuance of the alternative writ of mandamus against the Mayor “to compel performance of a clear legal duty imposed by law—to employ 731 sworn police officers.” *Spann*, 979 N.W.2d at 79.

23. However, no hearing was ever held whereat the Mayor would demonstrate his compliance with the writ or else show cause why he had not done so.

24. Instead, the parties in that case stipulated to a dismissal without prejudice. *Spann v. Minneapolis City Council*, 27-CV-20-10558, Doc. 82 (Minn. Dist. Ct. Oct. 2, 2022).

25. Pursuant to that stipulation, the Court entered an Order and Judgment accordingly, and no show-cause hearing was held. *Id.*, Docs. 84 (Order) & 85 (Judgment) (Oct. 3, 2022).

The Mayor has ignored the courts’ rulings for more than four years

26. In April 2021, before the Court issued the alternative writ of mandamus against the Mayor, the Mayor and the *Spann* plaintiffs stipulated to certain facts—including projections of what the Minneapolis Police Department’s number of sworn officers would be by certain dates

under the Mayor's then-current policies. *Id.*, Doc. 45 at 6 (April 21, 2021); *see also Spann*, 979 N.W.2d at 70-71.

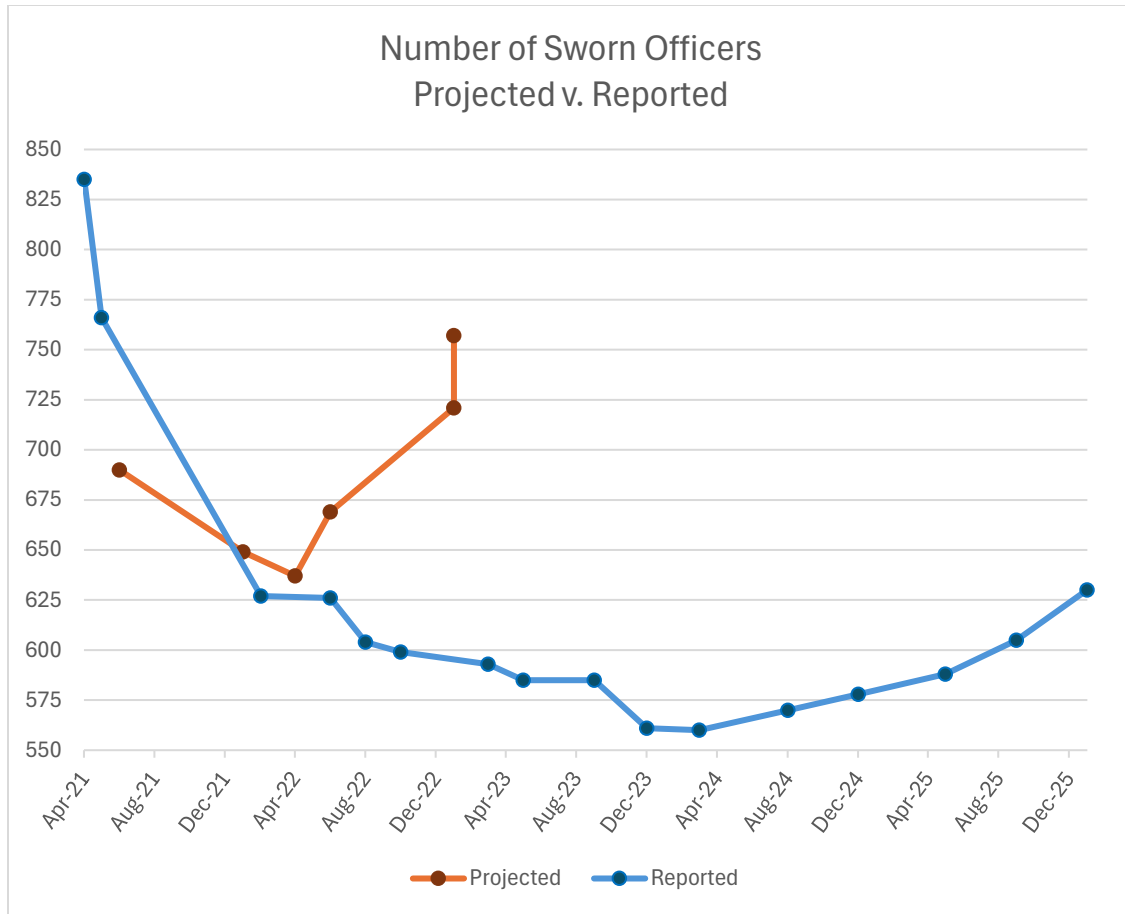
27. Those stipulations showed that the number of officers would be below 731 for many months in 2021 and 2022, before rising back above 731 in late 2022.

28. The Supreme Court held that that would be unlawful, and this Court issued a writ of mandamus to prevent that stipulated-to depression in staffing levels from occurring.

29. Regrettably, the Mayor has wholly failed to comply with these court rulings. Starting in December 2021 and continuously through today, the Mayor has suppressed police staffing levels, not just below the minimum legal required, but below even the lesser in the stipulated projections that this Court and the Supreme Court held would be unlawful.

30. Indeed, sometime in 2021 the Mayor allowed the number of Minneapolis police to fall below 631—more than 100 officers short of the legal minimum—and he has kept the number of police below that number for the entire four-year period since then.

31. The following chart and table show and compare the stipulated projections of sworn officers with the number of officers reported by publicly available reports:



Number of Sworn Officers		
Date	Projected ¹	Reported
4/10/2021 ²		835
5/22/2021 ³		766
6/1/2021	690	
1/1/2022	649	
2/26/2022 ⁴		627
4/1/2022	637	
6/1/2022	669	
6/4/2022 ⁵		626
8/31/2022 ⁶		604
10/15/2022 ⁷		599
1/1/2023	721	
1/31/2023	757	
3/15/2023 ⁸		593
5/31/2023 ⁹		585
9/16/2023 ¹⁰		585
12/31/2023 ¹¹		561
3/30/2024 ¹²		560
8/30/2024 ¹³		570
12/31/2024 ¹⁴		578
5/15/2025 ¹⁵		588
9/26/2025 ¹⁶		605
1/26/2026 ¹⁷		630

¹ *Spann v. Minneapolis City Council*, 27-CV-20-10558, Doc. 45 at 6 (Minn. Dist. Ct. April 21, 2021); compare with City of Minneapolis, “Minneapolis Police Department 2021 Sworn Hiring Plan including Community Service Officers,” January 25, 2021, <https://lims.minneapolismn.gov/Download/FileV2/23261/MPD-Staffing-Presentation.pdf> (projecting different estimates of where sworn-officer staffing would be by the end of 2021).

² *Id.*, Doc. 45 at 5.

³ Riham Feshir, “Judge sides with Minneapolis residents who want more cops,” July 2, 2021, <https://www.mprnews.org/story/2021/07/02/judge-sides-with-minneapolis-residents-who-want-more-cops> (“As of May 22, 2021, city of Minneapolis data shows that the sworn officers count was at 699 in addition to 67 on continuous leave....”).

⁴ Josh Skluzacek, “Minnesota Court of Appeals reverses order for Minneapolis to hire more police officers,” KSTP, March 14, 2022, <https://kstp.com/kstp-news/local-news/minnesota-court-of-appeals-reverses-order-for-minneapolis-to-hire-more-police-officers/> (“As of Feb. 26, 2022, MPD had 627 sworn officers, with 36 of those on continuous leave, according to city data.”).

⁵ Caroline Cummings, “Crime Minnesota Supreme Court orders Minneapolis to hire more cops as city down more than 200 officers from 2 years ago,” CBS News, June 21, 2022, <https://www.cbsnews.com/minnesota/news/minnesota-supreme-court-orders-minneapolis-to-hire-more-cops-as-city-down-more-than-200-officers-from-2-years-ago/> (“There were 626 sworn officers as of June 4, the most recent data available. That number includes 39 on ‘continuous leave.’”).

⁶ Mohamed Ibrahim, “A snapshot of Mayor Jacob Frey’s proposed police budget,” Minnpost, September 15, 2022, <https://www.minnpost.com/public-safety/2022/09/a-snapshot-of-mayor-jacob-freys-proposed-police-budget/> (“According to data from the city, Minneapolis had 604 sworn officers as of the end of August. That number drops to 571 when you subtract 33 officers on a continuous leave of 78 hours (roughly two weeks) or more.”).

⁷ John Rosengren, “What Was Behind the Twin Cities Metro’s Violent Crime Spike?,” Minnesota Monthly, January 9, 2023, <https://www.minnesotamonthly.com/lifestyle/what-was-behind-the-twin-cities-metros-violent-crime-spike/> (“The city has hired 62 officers since the beginning of 2020. Still, the total of 599 sworn officers as of mid-October 2022 is far short of the 731 the state Supreme Court said the city must employ in a ruling the previous summer. In September 2022, St. Paul’s police force, meanwhile, reported 64 fewer officers than its authorized total of 619.”).

⁸ Ernesto Londoño, “Minneapolis Agrees to Sweeping Changes in Policing,” New York Times, March 31, 2023, <https://www.nytimes.com/2023/03/31/us/minneapolis-police-reform-agreement.html> [<https://web.archive.org/web/20230401003514/https://www.nytimes.com/2023/03/31/us/minneapolis-police-reform-agreement.html>] (“Before Mr. Floyd was killed, Minneapolis had roughly 910 sworn officers. Since then, a sharp rise in resignations and retirements has reduced the total to 593 officers as of early March, well below the 731 officers required by the City Charter.”).

⁹ United States Department of Justice, Civil Rights Division; and United States Attorney’s Office, District of Minnesota, Civil Division, “Investigation of the City of Minneapolis and the Minneapolis Police Department,” June 16, 2023, https://www.justice.gov/d9/2023-06/minneapolis_findings_report.pdf (“As of May 2023, there were 585 sworn MPD officers, down from 892 in 2018. Many others are on extended medical leave.” (citing Policing & Community Safety Initiatives, minneapolis.org, <https://www.minneapolis.org/safetyupdates/future-of-public-safety> [https://perma.cc/S5RR-E7JY] (last updated May 15, 2023))) (brackets in original).

¹⁰ Liz Sawyer and Jeff Hargarten, “Minneapolis police staffing levels reach historic lows amid struggle for recruitment, retention,” Star Tribune, September 16, 2023, <https://www.startribune.com/minneapolis-police-staffing-levels-reach-historic-lows-amid-struggle-for-recruitment-retention/600305214> (“With 585 sworn officers, the department hovers just above that of the St. Paul police department, an agency that serves roughly 120,000 fewer residents. [...] Of the 585 officers, at least 30 remain on continuous leave. An estimated 284 are currently able to answer 911 calls, [Minneapolis Police Federation President Sherral] Schmidt said.”) (brackets added).

¹¹ Emily Baude, “Double overtime pay for Minneapolis officers ending as staffing reaches highest level in years,” KSTP, August 12, 2025, <https://kstp.com/kstp-news/top-news/double-overtime->

32. In November 2025, the Mayor, through counsel, represented in a letter that as of November 1, 2025, he only employed 624 peace officers.

33. According to the most recent statistics compiled by the Minnesota Board of Peace Officer Standards and Training at the end of January 2026, Minneapolis currently employs approximately 630 licensed peace officers in its police force.¹⁸

34. Even these numbers may be a significant overcount for purposes of assessing compliance with the Minneapolis City Charter's required police staffing, as Petitioners lack knowledge whether some of the reported officers are on leave, are part-time, or otherwise do not

[pay-for-minneapolis-officers-ending-as-staffing-reaches-highest-level-in-years/](#) ("561" "Sworn Personnel" at "End of 2023").

¹² Geoff Ziezulewicz, "Minneapolis police ranks begin to rebound," Axios, May 23, 2025, <https://www.axios.com/local/twin-cities/2025/05/23/minneapolis-police-force-recovery-george-floyd> ("Last year saw 'the lowest staffing level in over four decades,' police chief Brian O'Hara told Axios in March, with data showing 560 cops on the rolls as of March 2024.").

¹³ MPR News Staff, "Minneapolis officials say police force numbers are starting to rebound," MPR News, August 30, 2024, <https://www.mprnews.org/story/2024/08/30/minneapolis-officials-say-police-force-numbers-are-starting-to-rebound> ("There were more than 800 sworn officers at the beginning of 2020. City officials say that number is currently 570.").

¹⁴ Baude, *supra* ("578" "Sworn Personnel" at "End of 2024").

¹⁵ MPR News Staff, *supra* ("The force increased by 28 from March 2024 to mid-May, to 588 officers, the first increase since 2019 and a trend that Mayor Jacob Frey said he expects to continue.").

¹⁶ Louis Krauss, "After lengthy attrition, Minneapolis police welcome largest graduating recruitment class in years," The Minnesota Star Tribune, September 26, 2025, https://www.startribune.com/after-lengthy-attrition-minneapolis-police-welcome-largest-graduating-recruitment-class-in-years/601481405?fbclid=IwY2xjawNo-6ZleHRuA2FlbQIxMQBicmlkETE5Vm9KRHg5NzhQcFdUMFk4AR4CUG2htC3ZzSSBamXUGLnBSGNgH-uq3vW8dcsa5fO3Z918HeBUBkiM1PC76g_aem_whb4enAiLasoCYbFl8MdyA ("Police Chief Brian O'Hara said the department has around 605 sworn officers with the new graduations....").

¹⁷ Minnesota Board of Peace Officer Standards and Training, "Agency Statistics 2026," January 26, 2026, https://mn.gov/post/assets/Agency%20Information%20by%20Type%20and%20Size%202026_tcm1189-563872.pdf.

¹⁸ Liz Sawyer, Andy Mannix and Jeff Hargarten, "In Minneapolis, police staffing levels continued to drop in 2023. So did crime," *supra* note 1.

count fully toward the 731 required police.

35. In any event, having only 630 officers on the police force at any given time in this decade badly violates the Minneapolis City Charter, section 7.3.

Petitioners need relief due to the increase in crime in Minneapolis

36. Petitioners need relief pursuant to this Petition because of the ongoing increased crime and violence in Minneapolis caused by the Mayor's failure to employ police as required by the City Charter and as determined by the Minnesota Supreme Court.

37. At the beginning of 2020, the Minneapolis Police Department employed close to 900 officers.¹⁹

38. According to Minneapolis' own reported crime statistics, total crime has increased by 5.0% between 2020 and 2025, with Person Crimes up 16.7% and Property Crimes up 1.2%.²⁰ Comparing the 2025 crime numbers with the pre-pandemic numbers of 2019—when the City's police force was actually adequately staffed—reveals an even bleaker picture: an 8.4% increase in total crime, including a 74% increase in destruction/damage/vandalism of property, a 20% increase in homicides, a 19% increase in assault offenses, a 17% increase in arsons, and a 67% increase in

¹⁹ Police Executive Research Forum, "Chief Brian O'Hara discusses a tense week in Minneapolis," January 31, 2026, <https://www.policeforum.org/trending31jan26> ("Chief O'Hara: In 2020, there were 900 officers, and the chief was advocating to hire 400 more to increase the ranks. The pandemic hits, [then] George Floyd, and there's a mass exodus. By the time I got here two years later, of the 900 officers who were employed at the start of [2020], more than 500 had separated. And we were not hiring enough people to keep pace with regular attrition.")

²⁰ Minneapolis Data Source, <https://www.minneapolismn.gov/government/government-data/datasource/crime-dashboard> (data retrieved on Feb. 24, 2026); percentages refer to a comparison of crime data of 2020 and 2025.

motor vehicle thefts.²¹ As of the end of February of this year, auto thefts are up nearly 35% over the same period last year.²²

39. The only reason these numbers are not worse is that the Bureau of Criminal Apprehension, the Hennepin County Sheriff's Office,²³ the Minnesota State Patrol,²⁴ and the

²¹ Minneapolis Data Source, <https://www.minneapolismn.gov/government/government-data/datasource/crime-dashboard> (data retrieved on Feb. 24, 2026); percentages refer to a comparison of crime data of 2019 and 2025.

²² Crime Watch MN, "Minneapolis auto theft spike persisted through February," March 4, 2026, <https://alphanews.org/minneapolis-auto-theft-spike-persisted-through-february/>.

²³ Liz Sawyer and Jeff Hargarten, "Minneapolis police staffing levels reach historic lows amid struggle for recruitment, retention," Star Tribune, Sept. 16, 2023, <https://www.startribune.com/minneapolis-police-staffing-levels-reach-historic-lows-amid-struggle-for-recruitment-retention/600305214/?refresh=true>.

²⁴ City of Minneapolis, Council Action No. 2025A-0466, File No. 2025-00655, June 18, 2025, https://lims.minneapolismn.gov/Download/MetaData/39734/2025A-0466_Id_39734.pdf ("authoriz[ing] a contract with the State of Minnesota on behalf of the Minnesota State Patrol, for up to \$700,000, for additional law enforcement personnel to provide public safety and security measures to the City of Minneapolis, to assist the Police Department with specific law enforcement activities from July 1, 2025, through June 30, 2026."); City of Minneapolis, Council Action No. 2023A-0653, File No. 2023-00837, September 21, 2023, https://lims.minneapolismn.gov/Download/MetaData/31631/2023A-0653_Id_31631.pdf ("authoriz[ing] an increase to contract COM0005311 with the Minnesota State Patrol, in the amount of \$550,000, for a total amount not to exceed \$1,300,000, for law enforcement and public safety services to the Police Department through Dec 31, 2023."); City of Minneapolis, Council Action No. 2022A-0278, File No. 2022-00382, April 14, 2022, https://lims.minneapolismn.gov/Download/MetaData/25833/2022A-0278_Id_25833.pdf (authoriz[ing] agreements with the State of Minnesota, on behalf of the Minnesota State Patrol and the Bureau of Criminal Apprehension, and with other law enforcement agencies, for a total amount not-to-exceed \$1,100,000, from Apr. 15, 2022, through Dec. 31, 2023, for law enforcement support and services."); *see also* CBS Minnesota, "Minneapolis Calls In State Patrol, BCA To Assist With Crime," CBS News, May 4, 2022, <https://www.cbsnews.com/minnesota/news/minneapolis-state-patrol-bca-joint-powers-agreement/>.

Minnesota State Troopers²⁵ have stepped in to fill in the gaps for the City's understaffed police.²⁶

40. But the Mayor's failure to adequately staff the Minneapolis Police Department has not only affected crime prevention, it has crippled crime resolution. In 2019, the MPD employed 64 sworn investigators and two civilian investigators in its Violent Crimes Investigative Division; in 2024, it employed only 30 sworn investigators and four civilian investigators. In 2019, the MPD employed 21 sworn investigators assigned to property crimes; in 2025, that number plummeted to 9 sworn investigators and two civilian investigators.²⁷ That's just 11 property-crimes investigators for over 28,000 property crimes committed in 2024.²⁸

41. The gutting of these divisions has led to the terrible but not unexpected result of poor clearance rates. Compared to the national crime clearance rates in 2023, the MPD's 2024 clearance rates fall short in nearly every category: MPD's clearance rates were approximately 57.7% less for aggravated assaults, 60.1% less for robberies, 61.8% less for burglaries, 17% less

²⁵ Cathy Wurzer and Gretchen Brown, "Minneapolis Council member: State Troopers will bolster Minneapolis Police," MPR News, July 7, 2022, <https://www.mprnews.org/episode/2022/07/07/city-council-member-state-troopers-will-bolster-minneapolis-police>;

²⁶ See also Kyle Brown, "Walz to send 20 state law enforcement officers to support patrols in Minneapolis," KSTP.com, August 28, 2025, <https://kstp.com/kstp-news/top-news/walz-to-send-20-state-law-enforcement-officers-to-support-patrols-in-minneapolis/>; Joanna Putman, "'Unacceptable level of crime and violence': Minneapolis PD seeks help from other agencies after crime spike," Police1.com, July 29, 2024, <https://www.police1.com/crime/unacceptable-level-of-crime-and-violence-minneapolis-pd-seeks-help-from-other-agencies-after-crime-spike>;

²⁷ Minneapolis Police Department, "2024 Clearance Rates," November 12, 2025, <https://kstp.com/wp-content/uploads/2025/11/MPDCaseClearanceRatesPresentation11-12-25.pdf>.

²⁸ Ben Henry, "'Drowning in cases': Rare breakdown of MPD case clearance rates reveals challenges facing investigators," November 13, 2025, <https://kstp.com/kstp-news/top-news/drowning-in-cases-rare-breakdown-of-mpd-case-clearance-rates-reveals-challenges-facing-investigators/>.

for auto thefts, 30.6% less for larcenies, and 76.5% less for rapes.^{29, 30}

42. The available evidence strongly indicates that staffing cuts are the reason for this underperformance. The MPD has prioritized investigative staffing in its homicide department, and has maintained that staffing at a nearly constant level since 2019—and that is the only department for which the MPD’s clearance rates currently exceed the national average.^{31, 32}

43. Petitioners have been injured by the Mayor’s failure to fully employ the Minneapolis Police Department.

44. Petitioner Ronald Peterson has lived in Minneapolis for over 35 years. Peterson Decl. ¶¶4-6.

45. Prior to the last six years, he had not been the victim of crime in Minneapolis since 1989. *Id.* at ¶8.

46. But since Mayor Frey started suppressing police levels in 2020, Mr. Peterson has experienced a long series of criminal activity.

47. Since Mayor Frey started suppressing police levels in 2020, criminals have damaged Mr. Peterson’s car multiple times while it was sitting in his Minneapolis driveway. *Id.* at ¶¶10-11.

48. Since Mayor Frey started suppressing police levels in 2020, Mr. Peterson has had \$10,000 worth of tools stolen from his Minneapolis garage. *Id.* at ¶9.

²⁹ Gregory Hestness, “MPD Staffing Crisis Takes a Toll: Slowed 911 Response and Plunging Clearance Rates,” January 30, 2026, <https://minneapolistimes.com/mpd-staffing-crisis-takes-a-toll-slowed-911-response-and-plunging-clearance-rates/>.

³⁰ Minneapolis Police Department, “2024 Clearance Rates,” November 12, 2025, <https://kstp.com/wp-content/uploads/2025/11/MPDCaseClearanceRatesPresentation11-12-25.pdf>.

³¹ See Gregory Hestness, *supra*.

³² See Minneapolis Police Department, “2024 Clearance Rates,” *supra*.

49. Since Mayor Frey started suppressing police levels in 2020, Mr. Peterson has been the victim of a hit-and-run crash. *Id.* at ¶12.

50. Since Mayor Frey started suppressing police levels in 2020, someone was shot within two blocks of Mr. Peterson's home. *Id.* at ¶15.

51. Since Mayor Frey started suppressing police levels in 2020, Mr. Peterson has had to evacuate a grocery store due to a shooting incident. *Id.* at ¶13.

52. Mr. Peterson used to give no thought to crime in Minneapolis. Now, he double-checks locks, stays in after dark, and expects that crime could happen anytime, anywhere in Minneapolis. *Id.* at ¶16.

53. Petitioner John Tschohl owns ten rental properties in the City of Minneapolis. Tschohl Decl. ¶¶5-7.

54. In the past five years, Mr. Tschohl has personally experienced the protracted response times incident to the MPD police staffing shortage, having multiple times phoned MPD for assistance with a tenant and waited for them to arrive for over an hour—and multiple other times given up on waiting. His experience calling the Bloomington police measured a response time of a fraction of MPD's. *Id.* at ¶¶8-9.

55. Also in the last five years, a now-former tenant in one of Mr. Tschohl's properties in the Howe neighborhood reported to him about having his personal property stolen from his vehicles, as well as having multiple vehicles stolen from the property. *Id.* at ¶10.

56. The rise in crime in Minneapolis—and the all-too-accurate public perception of Minneapolis as a city with a lot of crime and too few police officers—has negatively affected the value of Mr. Tschohl's properties. Of late, he has observed that the cost to rent properties in Minneapolis is declining. And based on his experience owning properties in different Minnesota

cities and his knowledge of the real estate markets in those cities, Mr. Tschohl assesses that his Minneapolis properties could be worth up to twenty-percent more were they located in a neighboring city such as Bloomington or Richfield. *Id.* at ¶¶11-17.

57. Petitioner Laverne Turner grew up and has lived in Minneapolis almost his entire life, and he has never seen Minneapolis as overrun with crime as it is today. Turner Decl. ¶¶2, 14-15, 17-18.

58. Mr. Turner lives in Minneapolis's Folwell neighborhood with his wife and three children, and has lived there for more than a decade. *Id.* at ¶¶4-6.

59. Out of fear for his children's safety, for the whole of their childhoods Mr. Turner has not been able to let them play in their own front yard in Minneapolis—and for good reason. *Id.* at ¶10.

60. Since Mayor Frey started suppressing police levels in 2020, the Turners' family home in Minneapolis has been hit by gunfire. *Id.* at ¶11.

61. Since Mayor Frey started suppressing police levels, the corner store in the Turners' Minneapolis neighborhood has frequently been robbed. *Id.* at ¶12.

62. Since Mayor Frey started suppressing police levels, Mr. Turner and his family regularly hear gunshots in their Minneapolis neighborhood. *Id.*

63. Since Mayor Frey started suppressing police levels, although the speed limit on the Minneapolis street where the Turners live is 25 miles per hour, cars routinely go faster than 50 miles per hour and blow through stop signs and traffic lights. *Id.* at ¶23.

64. Since Mayor Frey started suppressing police levels, Mr. Turner's wife was hit by a car when she was crossing an intersection near their house in Minneapolis. *Id.* at ¶24.

65. Since Mayor Frey started suppressing police levels, vehicle accidents have become

a weekly occurrence in the Minneapolis neighborhood where the Turners live. *Id.* at ¶25.

66. In or around early March 2026 there was a hit-and-run near the Turners' family home in Minneapolis. Mr. Turner heard the crash from inside his house. *Id.* at ¶26.

67. The result of all this has been that, since Mayor Frey started suppressing police levels, Mr. Turner has become reluctant to drive after dark in his Minneapolis neighborhood. *Id.* at ¶28.

68. For the majority of the past six years, the house next door to the Turners' home in Minneapolis has been used as a halfway house. Since Mayor Frey started suppressing police levels Mr. Turner has regularly seen residents there dealing drugs. *Id.* at ¶35.

69. Since Mayor Frey started suppressing police levels in 2020, vagrants, including drug users, have been loitering and camping out around the Turners' home and in nearby empty lots. *Id.* at ¶¶29-31.

70. In early March 2026, Mr. Turner found a vagrant overdosing in front of his family home in Minneapolis. *Id.* at ¶40.

71. On another occasion the vagrants filled the Turners' garbage cans with rocks, dirt, and debris—and the City fined *Mr. Turner* for having improper materials in his trash containers. *Id.* at ¶34.

72. In 2025, a pre-teen boy was shot and killed in a Minneapolis park a block away from the Turners' family home. *Id.* at ¶13.

73. Since Mayor Frey started suppressing police levels, criminals have twice broken into the Turners' Minneapolis garage and stolen the Turners' lawnmowers. *Id.* at ¶33.

74. Because Mr. Turner had no expectation that the Minneapolis police would be able to do anything, he saw no point in reporting these crimes. *Id.*

75. Since Mayor Frey started suppressing police levels, Mr. Turner has rarely seen police patrolling the area of his home. *Id.* at ¶20.

76. It is common knowledge in Mr. Turner's neighborhood that the Minneapolis police are understaffed and that the fourth precinct where his family lives—which has the most shots-fired calls than all other precincts combined³³—has only two patrol officers on patrol at any given time. This public knowledge has emboldened criminals to act without fear of getting caught or facing consequences. *Id.* at ¶¶16, 21.

77. In recent months, Mr. Turner was rear-ended while driving, but he couldn't even get a police officer to come and write an accident report. When he called the police, the operator told him that police only respond to an accident when there has been an injury. *Id.* at ¶27.

78. Since Mayor Frey started suppressing police levels, Mr. Turner feels like he lives in the wild west. Every time he leaves his home he has to constantly maintain his guard, stay aware of his surroundings, and communicate nonverbally his awareness to those around him who might do him or his family harm, to deter them from doing anything bad. *Id.* at ¶¶41-42.

79. Petitioner Mary Holmberg and her husband have owned a residence in Minneapolis' Bottineau neighborhood since 2012. Holmberg Decl. ¶¶2-3.

80. In the summer of 2023, criminals broke into Mrs. Holmberg's Minneapolis house. *Id.* at ¶¶6-7.

81. Because Mrs. Holmberg and her husband had no expectation that the Minneapolis police could or would do anything in response, they saw no point in even reporting the crime. *Id.*

³³ Minneapolis Data Source, <https://www.minneapolismn.gov/government/government-data/datasource/crime-dashboard/> (from July 1, 2020 through January 1, 2026, precinct four has received 25,550 shots fired calls compared to 43,955 total citywide shots fired calls. Among all Minneapolis neighborhoods, Falwell ranks fourth in number of shots fired calls with 3,055.).

82. Mrs. Holmberg has noticed that the neighborhood has suffered a general decline in recent years, with multiple businesses she once frequented having closed. *Id.* at ¶8.

LEGAL ARGUMENT

Petitioners are entitled to mandamus relief

83. The Mayor is a person with a present, official legal duty to maintain the police force of at least 0.0017 sworn officers on the police force per resident of Minneapolis, or 731 licensed peace officers. City Charter §7.3; *Spann*, 979 N.W.2d at 77.

84. From 2021 until the conclusion of 2030, including on the date of the filing of this Petition, the Mayor has no discretion to employ fewer than 731 licensed peace officers.

85. This is a public duty that the Mayor owes to all Minneapolis citizens alike. *See Cracraft v. St. Louis Park*, 279 N.W.2d 801, 805 (Minn. 1979).

86. Petitioners, as residents, property owners, and taxpayers of Minneapolis, are beneficially interested in the issuance of a writ of mandamus forcing the Mayor to fulfill his public duty to employ the required police force under the City Charter. *State ex rel. Currie*, 40 N.W. 561, 562 (Minn. 1888); *see also Spann v. Minneapolis City Council*, 27-CV-20-10558, Doc. 51 at ¶43 (Minn. Dist. Ct. July 1, 2021).

87. Petitioners have no plain, speedy, or adequate remedy in the ordinary course of law to enforce the Mayor's compliance with the City Charter. *See Spann v. Minneapolis City Council*, 27-CV-20-10558, Doc. 51 at ¶¶52-55 (Minn. Dist. Ct. July 1, 2021).

88. For years, the Mayor has failed to employ at least 0.0017 sworn officers on the police force per resident of Minneapolis, or 731 licensed peace officers, pursuant to City Charter §7.3. The current number employed on the police force is approximately 630.

89. The Mayor's failure to employ at least 0.0017 sworn officers on the police force

per resident of Minneapolis, or 731 licensed peace officers, constitutes a public wrong.

90. Additionally, as their declarations and the allegations set forth herein attest, Petitioners have been specifically injured by the Mayor's failure to employ at least 0.0017 sworn officers on the police force per resident of Minneapolis, or 731 licensed peace officers.

91. The Mayor has the power, under City Charter section 7.3(b), to appoint temporary police in the event of an emergency.

92. There is no valid excuse for the Mayor's nonperformance.

PRAYER AND DEMAND FOR RELIEF

93. Petitioners pray that the Court find, adjudge, and decree that the Mayor has failed and refused to perform his legal duty to employ the Minneapolis police, as described herein.

94. Petitioners pray for a peremptory writ of mandamus compelling the Mayor to immediately comply with City Charter section 7.3 and employ the police force such that there are 0.0017 licensed peace officers per resident of Minneapolis, consistent with the number of residents in Minneapolis as reported by the U.S. Census Bureau's 2020 census. Minn. Stat. §586.03.

95. Petitioners demand that the Mayor, immediately after the receipt of a copy of the writ of mandamus, comply with Section 7.3 of the Minneapolis City Charter and employ at least 0.0017 licensed peace officers to police the City of Minneapolis consistent with the number of residents in Minneapolis as reported by the U.S. Census Bureau's 2020 census.

96. Alternatively, Petitioners pray for an alternative writ of mandamus and demand that the Mayor show cause, at a time and place as soon as possible, to be determined by the Court, why he has not complied with his obligation described herein. Minn. Stat. §586.03.

97. If the Court issues an alternative writ, Petitioners pray that the Court direct the time and manner of service for any Order to Show Cause or Writ.

98. Petitioners pray that, upon prevailing, the Court award them their costs and disbursements incurred in this action.

99. Petitioners pray that the Court award them such other and further relief as may be just, lawful, and appropriate.

UPPER MIDWEST LAW CENTER

Dated: March 16, 2026

/s/ Douglas P. Seaton
Douglas P. Seaton (#127759)
Rachel K. Paulose (#280902)
Nicholas J. Nelson (#391984)
Austin M. Lysy (#505052)
12600 Whitewater Dr., Suite 140
Minnetonka, Minnesota 55343
doug.seaton@umlc.org
rachel.paulose@umlc.org
nicholas.nelson@umlc.org
austin.lysy@umlc.org
(612) 428-7000
Attorneys for Petitioners

ACKNOWLEDGMENT

The undersigned hereby acknowledges that costs, disbursements, and reasonable attorney and witness fees may be awarded pursuant to Minn. Stat. §549.211, subd. 2, to the party against whom the allegations in this pleading are asserted.

Dated: March 16, 2026

/s/ Douglas P. Seaton
Douglas P. Seaton (#127759)

STATE OF MINNESOTA	DISTRICT COURT
COUNTY OF HENNEPIN	FOURTH JUDICIAL DISTRICT
Ronald Peterson; John Tschohl; Laverne Turner; Mary Holmberg, Petitioners, v. Mayor Jacob Frey, Respondent.	DECLARATION OF RONALD PETERSON IN SUPPORT OF PETITIONERS' PETITION FOR MANDAMUS

STATE OF MINNESOTA)
)ss.
 COUNTY OF HENNEPIN)

RONALD PETERSON states as follows:

1. My name is Ronald Peterson. I make this affidavit on personal knowledge.
2. I am a United States Army veteran. I served in the U.S. Army for six years.
3. I am a resident and taxpayer living in the City of Minneapolis, Minnesota.
4. I live in the Powderhorn Park neighborhood of Minneapolis.
5. I have lived in my Powderhorn Park home since 1995.
6. Prior to 1995, I also lived in Minneapolis.
7. In 1989, I had my car stolen from my home in Minneapolis.
8. Prior to 2020, I had not been the victim of crime in Minneapolis since 1989.
9. Sometime after the protests in the summer of 2020, approximately \$10,000 worth of Snap-on tools were stolen from my garage. I filed a police report, but my tools

were never recovered, and, to my knowledge, the perpetrator was never arrested for this crime.

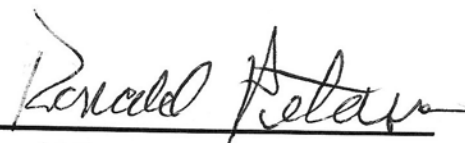
10. I own a 2016 Chevrolet Silverado that I keep parked in my driveway when I'm not using it.
11. Between November and December 2024, my Silverado was damaged multiple times while parked in the driveway, including a broken windshield, a broken ignition, a broken driver's side door, and a broken driver's side window. I filed police reports for the broken ignition and broken driver's side door. To my knowledge, the perpetrator or perpetrators who damaged my Silverado have not been arrested for these crimes.
12. In the fall of 2025, I was the victim of a hit and run. While driving my Silverado, I was stopped at a red light at Nicollet Avenue and East 46th Street when another vehicle rear-ended me. The other vehicle drove off. I did not call the police or file a police report. My Silverado suffered approximately \$15,000 in damages.
13. Sometime in 2025, while I was shopping at the Cub grocery store at 2850 26th Avenue South, the store was evacuated due to a shooting. After I had been evacuated, I recall learning that at least one person had been shot at the store.
14. Sometime after the protests in the summer of 2020, I noticed that a shot spotter had been installed in the parking lot at the Cub grocery store at 2850 26th Avenue South. I had never before seen a shot spotter at that location in all the years I had shopped there.
15. Around four or five years ago, I was in my home when I heard what sounded like

gun shots. I called the police to report the sound. Later, I remember reading that someone had been shot only a block and a half away from my home.

16. As a result of my personal experience with crime in Minneapolis, and because of the increase in crime in Minneapolis, I have changed how I live. I used to think nothing of going grocery shopping after sunset, but now I do not even leave my home after sunset. I now always double-check that my car, garage, and home are locked. I never used to think that I would be the victim of crime living in Minneapolis, but I now expect that crime could happen at any time.
17. As a resident and taxpayer of the City of Minneapolis, I would like to see more police employed by the Minneapolis Police Department, at least the number of police that the Minneapolis City Charter requires the Mayor to employ.
18. I am personally harmed by the failure of the Mayor and city government to fully fund and staff the Minneapolis Police Department. The inability of police to respond to crime, control crime, or deter crime has hurt my standard of living and decreased my enjoyment of my own home in Minneapolis. I am joining the present action to help remedy this harm.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 3/13/26
In Hennepin County, Minnesota


Ronald Peterson

STATE OF MINNESOTA	DISTRICT COURT
COUNTY OF HENNEPIN	FOURTH JUDICIAL DISTRICT
Ronald Peterson; John Tschohl; Laverne Turner; Mary Holmberg, Petitioners, v. Mayor Jacob Frey, Respondent.	DECLARATION OF LAVERNE TURNER IN SUPPORT OF PETITIONERS' PETITION FOR MANDAMUS

STATE OF MINNESOTA)
)ss.
COUNTY OF HENNEPIN)

LAVERNE TURNER states as follows:

1. My name is Laverne Turner. I make this affidavit on personal knowledge.
2. Except for when I attended college, I have been a lifelong resident of the City of Minneapolis.
3. From 2004 until about 2020, I ran a nonprofit called East Phillips Park Sports Association that mentored young people through community athletics.
4. I have a wife and three children who live with me in Minneapolis.
5. I currently reside in the Folwell neighborhood of Minneapolis. My family and I have resided here almost 10 years.
6. Prior to our current home, my family and I lived in another home in the Folwell neighborhood for a little over a year.

7. The Folwell neighborhood is in police precinct four.
8. Prior to living in the Folwell neighborhood, my family and I lived in the East Phillips neighborhood of Minneapolis. We lived there for about 10 years.
9. I grew up on the south side of Minneapolis.
10. I am a stay-at-home dad who provides caregiving to my children, two of whom are still in high school. I was and still am very concerned for my children's safety living in Minneapolis—so much so that I didn't allow them to play in the front yard when they were growing up because I was afraid they might become the victims of some senseless crime.
11. For example, sometime in the last six years, I came home to find a bullet hole in our house, right under the front windows in the siding. Thankfully, no one was home at the time. But this kind of random violence is why I fear for my children's safety.
12. Moreover, the corner store in our neighborhood is continually getting robbed and there are frequently gun shots in the area.
13. In the summer of 2025, a pre-teen boy was shot and killed at Folwell Park, just one block from where my family and I live.
14. Having grown up in Minneapolis myself, in my experience Minneapolis is much more dangerous than when I was growing up here.
15. I attribute the rise in crime in Minneapolis to be substantially due to the insufficient number of police officers employed by the City.
16. It is public knowledge that the Minneapolis police are understaffed.
17. Based on my experience living in Minneapolis almost my entire life, I think the

shortage of police officers has emboldened some people to commit crimes without fear of being caught or facing consequences.

18. In my experience, crime in Minneapolis was bad before 2020, but ever since the 2020 protests after the death of George Floyd crime in the City has gotten worse.
19. The fourth police precinct where I live has the most shots-fired calls of all Minneapolis police precincts.
20. Despite all this gunshot activity, I rarely see patrol officers in the area of my home.
21. It is my understanding, and I believe it is also commonly known in the neighborhood, that there are only two patrol officers on patrol at any given time in the fourth precinct.
22. My family and I live on North Freemont Avenue. Outside our home, North Freemont is busy street with lots of traffic going by.
23. Being a pedestrian in the area is like a death sport. The speed limit in front of my house is only 25 miles per hour, but vehicles frequently come speeding down the road in excess of 50 miles per hour. Whenever I cross the street, I have to make sure I look both ways several times because, at such excessive speeds, vehicles fly down the street and can be at you before you've even finished crossing. Even at intersections with stop signs and traffic lights I have to be extra careful because I have no confidence that a vehicle will even stop at a sign or a red light; I've seen vehicles blow right through them.
24. A year and a half ago, in fact, my wife was hit at an intersection about 500 feet from our home while she was crossing the street. The vehicle was stopped, so my wife

began to cross the intersection, but then the vehicle ran into my wife.

25. Car accidents are so common in the area of our home, I learn about another car accident happening almost every week.

26. Sometime around the beginning of March, there was a hit and run nearby our home. I could hear it from inside our home. A friend of mine who was on the way to visit our home saw the accident and told me she saw teenagers run from one of the cars.

27. About three to four months ago, I was the victim of a car accident. I was driving my vehicle in the area of 26th Avenue and North Freemont when I got hit by another vehicle from behind. I called the Minneapolis police and asked that an officer come out to the accident site. I wanted the police to write an accident report that I could use to file an insurance claim. I was told by the operator that the police would only come if someone had been hurt. Since no one was hurt, no police came.

28. I don't like to drive at night anymore out of fear of becoming a victim of a car accident or a hit and run. In my experience, people are even more emboldened to act recklessly at night, and the younger, more mischievous elements of the community are out more at night.

29. Around the time of the 2020 protests, vagrants—at least some of whom are drug users—began loitering around the area of my family's Folwell home and camping out in empty lots nearby

30. For at least a couple of years the City didn't do anything about these encampments. I and one of our neighbors would call the Minneapolis police; the police would come and ask the vagrants to disperse; they would leave temporarily, but then they always

returned. Only recently did I observe that fencing had been put up around some of the area's empty lots to keep people out.

31. But to this day, vagrants still loiter in the area of our home—including in front of our house and in the alley behind our house—and I have to continually ask them to disperse.
32. Even when I don't ask the vagrants to disperse, I still feel that I have to engage them by making eye contact with them in order to let them know that I see them. I do this as a safety precaution. I think that if they know they're being watched, they're less likely to hang around or do something to me, my family, or my property.
33. Sometime in the summer of 2025, our garage, which is in the alley behind my family's home, was broken into two times. Both times a lawnmower was stolen. I did not call the police or make a police report on either occasion because I felt there was no point: I have no confidence that the police would actually be able to find the perpetrator or perpetrators. However, I suspect the perpetrators were one or more of the vagrants in the area.
34. Even when the vagrants are not stealing our property, they sometimes cause my family trouble. At least one time they cleaned out the alley behind our home, in the area of our garage. But they put all the rocks and dirt and other debris in our garbage cans, and I ended up getting fined by the City for having the wrong stuff in our garbage cans. I had to tell the vagrants not to do that.
35. Sometime in 2020, the owner of the house next door to our home began to use their house as a halfway house. I observed that the tenants were always changing, and I

consistently observed one or two people from that house selling drugs.

36. I made complaints about this halfway house to the fourth precinct police.

37. On one occasion, I saw a police officer parked in a patrol car across the street from my home. I told him about the halfway house, the drug dealing, and the vagrants. The police officer told me that the police were watching the halfway house, but that they can't do anything about it.

38. Sometime after that encounter with the police officer, I recall hearing that the halfway house had been raided by law enforcement, but not Minneapolis police.

39. In the winter of 2024, a fire broke out on the second floor of the halfway house. Since then, the house has appeared to me to be empty.

40. At the beginning of March of this year, I found someone overdosing just outside my home.

41. From shootings to robberies to speeding to drug use, I hear, see, and hear about so much crime in my neighborhood. I feel like I'm living in the wild west.

42. All the crime and vagrants in the area cause me stress. I have had to adapt to the dangerous environment by living in a state of constant vigilance. Every time I leave my home, I need to constantly be aware of my surroundings and communicate my awareness to those around me, to deter them from doing anything bad. I can never let my guard down.

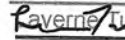
43. My family and I have been personally harmed by the City's failure to adequately fund and staff the Minneapolis Police Department.

44. As a resident and taxpayer of Minneapolis, I would like to see the Mayor hire more

police, at least the number required by the City Charter.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on Mar 13, 2026.
In Hennepin County, Minnesota

 (Mar 13, 2026 11:19:01 CDT)
Laverne Turner

STATE OF MINNESOTA	DISTRICT COURT
COUNTY OF HENNEPIN	FOURTH JUDICIAL DISTRICT
Ronald Peterson; John Tschohl; Laverne Turner; Mary Holmberg, Petitioners, v. Mayor Jacob Frey, Respondent.	DECLARATION OF JOHN TSCHOHL IN SUPPORT OF PETITIONERS' PETITION FOR MANDAMUS

STATE OF MINNESOTA)
)ss.
 COUNTY OF HENNEPIN)

JOHN TSCHOHL states as follows:

1. My name is John Tschohl. I make this affidavit on personal knowledge.
2. I reside in Bloomington, Minnesota.
3. Apart from my home, I own properties in the Minnesota cities of Minneapolis, Bloomington, Richfield, and Fridley.
4. I have owned properties in Minneapolis, Minnesota, for over 40 years.
5. In Minneapolis, Minnesota, I own one single-family home, seven duplexes, one multi-dwelling unit comprised of three residences, and one multi-dwelling unit comprised of six residences, all of which I rent out to tenants.
6. I rent out the residences in my Minneapolis properties to twenty-four tenants.
7. The properties that I own in Minneapolis, Minnesota, are located in the Lowry Hill,

Whittier, Marcy-Holmes, Howe, Windom, Armatage, Chowen Park, and Tanglewood neighborhoods.

8. In the past five years, I personally have had to call the Minneapolis police to one of my Windom properties at least five times to address issues I was having with one of my tenants. On these occasions, I personally waited for the police to arrive. On most of these occasions, the police took over an hour to arrive. On some of these occasions, the police took so long to arrive that I gave up on waiting for them and left.
9. I have also had to call the Minneapolis police to some of my other Minneapolis properties. On some of these occasions, I also recall giving up on waiting for the police to arrive because of how long they were taking.
10. In the past five years, I have had one now-former tenant at my Howe property tell me that he had his personal property stolen from his vehicles and multiple vehicles stolen from the property.
11. Generally, the value of my properties in Minneapolis, Minnesota, have been negatively affected by the increase in crime in Minneapolis and the public perception of Minneapolis as a city with a lot of crime and too few police officers.
12. Based on my experience owning properties in different Minnesota cities and my knowledge of the real estate markets in those cities, it is my assessment that my Minneapolis properties could be worth up to twenty-percent more were they located in a neighboring city such as Bloomington and Richfield.
13. Most recently, I have observed that the cost to rent a property in Minnesota is

coming down.

14. In Bloomington, Minnesota, I own a multi-dwelling unit comprised of ten residences that I rent out to tenants.

15. Based on my experience calling the police in Bloomington, Minnesota, the Bloomington police response time is a fraction of what the Minneapolis police response time is.

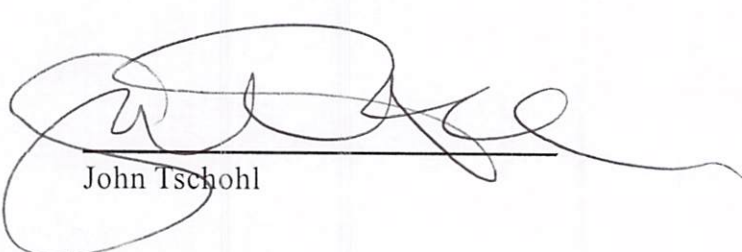
16. In Richfield, Minnesota, I own two duplexes that I rent out to tenants.

17. In Fridley, Minnesota, I own one multi-dwelling unit comprised of four residences that I rent out to tenants.

18. As a property owner and property tax payer of Minneapolis, I am interested in seeing the Mayor fulfill his duty the number of police officers required under the Minneapolis City Charter.

I declare under penalty of perjury that the foregoing is true and correct.

**Executed on March 6, 2026.
In Hennepin County, Minnesota**



John Tschohl

STATE OF MINNESOTA	DISTRICT COURT
COUNTY OF HENNEPIN	FOURTH JUDICIAL DISTRICT
Ronald Peterson; John Tschohl; Laverne Turner; Mary Holmberg, Petitioners, v. Mayor Jacob Frey, Respondent.	DECLARATION OF MARY HOLMBERG IN SUPPORT OF PETITIONERS' PETITION FOR MANDAMUS

STATE OF MINNESOTA)
)ss.
COUNTY OF HENNEPIN)

MARY HOLMBERG states as follows:

1. My name is Mary Holmberg. I make this affidavit on personal knowledge.
2. My husband and I own a property in the Bottineau neighborhood of the City of Minneapolis, along Marshall Street.
3. My husband and I have owned our Bottineau neighborhood residence since 2012.
4. Our Bottineau residence sits along the Mississippi River, and we had a boat that was moored along the riverfront.
5. In 2017, a group of juveniles broke into our boat and stole some motors. One of our neighbors' boats was also broken into at that time. We called the police and filed a police report. Despite our requests that the juveniles be charged, the County Attorney refused to charge the juveniles.

6. In October of 2023, our Bottineau residence was broken into. We did not call the Minneapolis police or file a police report because we had little hope they would or could do anything about it.
7. At the time we discovered that our Bottineau residence had been broken into, I stayed at the residence on workdays for two weeks to discourage any squatters in the neighborhood.
8. After the 2020 protests and the COVID-19 lockdowns, two businesses near our residence on Marshall Street closed. The loss of friendly foot traffic from the patrons of these businesses greatly diminished the friendly atmosphere in the neighborhood.
9. I worked downtown since 1987. From 1987 to 2019 my employer officed at 250 Second Avenue South in Minneapolis. In August 2019, my employer moved out to Bloomington, Minnesota.
10. Before my job moved to Bloomington, I would take the number eleven bus near Minneapolis Central Library. Before the move, I had begun feeling unsafe in this area. People who appeared to be homeless would sometimes fight each other or approach me for money. The same kind of people would approach my coworkers while they were smoking out on the corner of 3rd Street and 2nd Avenue. My employer had windows with street-level planters on 2nd Avenue and public urination was common there in the summer.
11. Ever since my job moved to Bloomington, I no longer visit downtown Minneapolis unless it is needful.
12. As a property owner and property taxpayer of Minneapolis, I would like to see the

Mayor hire more police, at least the number required by the Minneapolis City Charter.

13. If there were a greater police presence in Minneapolis, and if the crime were reduced, I would feel safer visiting downtown Minneapolis.

14. I am personally harmed by the failure of the Mayor and city government to fully fund and staff the Minneapolis Police Department. Crime has personally affected me, my sense of safety is compromised, and I have had to modify my daily life habits to adjust to the rise in crime in Minneapolis.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on Mar 13, 2026.
In Hennepin County, Minnesota

Mary Holmberg

Mary Holmberg (Mar 13, 2026 12:10:29 CDT)

Mary Holmberg