

STATE OF MINNESOTA  
COUNTY OF HENNEPIN

DISTRICT COURT  
FOURTH JUDICIAL DISTRICT

State of Minnesota,

Case Type: Criminal  
Court File No. 27-CR-20-12646

Plaintiff,

vs.

Derek Michael Chauvin,

Defendant.

**SUPPLEMENTAL PROSECUTION  
DISCLOSURE PURSUANT TO  
RULE 9.01, SUBD. 1**

TO: The above-named defendant and defendant's counsel, Eric J. Nelson, Halberg Criminal Defense, 7900 Xerxes Avenue South, Ste. 1700, Bloomington, MN 55431.

Pursuant to Rule 9.01, subd. 1, Minn. R. Crim. P., attached please find the following supplemental disclosure consisting of pages 41281-41311, incorporating by reference all previous disclosures:

- Police/investigative report(s)
- Statement(s) relating to the case
- Statement(s) of the defendant and/or accomplice(s)
- Social service report(s)
- Search warrant(s)
- Laboratory report(s)
- Report(s) of medical or mental examination(s)
- Criminal history information
- Evidence receipt(s)
- Diagram(s)/documentary exhibit(s)
- Photograph(s), video tape(s), audio tape(s), and DVDs

- \_\_\_\_\_ Business/public record(s)
- \_\_\_\_\_ Spreigl material
- \_\_\_\_\_ Exculpatory material
- X   Other: Memo to File re: Jan. 22, 2021 Interview With Dr. Daniel Isenschmid, Memo to File re: Positional Asphyxia Video, Affidavit of Robert Bennett, GJ Material 2020-338-338

The State may, pursuant to Minn. R. Evid. 608(b) or any other rule, cross-examine defendant, if defendant testifies, about any of defendant's conduct that is disclosed as part of this, any previous, or any subsequent, disclosure.

PURSUANT TO MINN. R. CRIM. P. 9.03, SUBD. 4, DISCOVERY MATERIALS SHALL REMAIN IN THE CUSTODY OF DEFENSE COUNSEL, shall not be placed in defendant's custody, and shall be used by defense counsel only for the purpose of conducting that attorney's side of the case. Absent an order from the court issued upon written motion, failure to comply with Minn. R. Crim. P. 9.03, subd. 4, may result in sanctions pursuant to Minn. R. Crim. P. 9.03, subd. 8.

Dated: January 25, 2021

Respectfully submitted,

KEITH ELLISON  
Attorney General  
State of Minnesota

**/s/ Matthew Frank**  
MATTHEW FRANK  
Assistant Attorney General  
Atty. Reg. No. 021940X  
445 Minnesota Street, Suite 1400  
St. Paul, Minnesota 55101-2131  
(651) 757-1448 (Voice)  
(651) 297-4348 (Fax)  
matthew.frank@ag.state.mn.us

ATTORNEYS FOR PLAINTIFF