27-CR-20-12646

Filed in District Court State of Minnesota 4/12/2021 2:56 PM

# STATE OF MINNESOTA

# COUNTY OF HENNEPIN

State of Minnesota,

Plaintiff,

vs.

Derek Michael Chauvin,

Defendant.

# DISTRICT COURT

FOURTH JUDICIAL DISTRICT

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

# 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 49827-50272, 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)
- X Photograph(s), video tape(s), audio tape(s), and DVDs

 Business/public record(s)

 Spreigl material

 Exculpatory material

 X
 Other: Seth Stoughton Supplemental Report, Witness Contact Forms, Graham v. Conner Factors, Use of Force Evaluation, Dr. Fowler material

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: April 12, 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