STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF HENNEPIN

FOURTH JUDICIAL DISTRICT

State of Minnesota,

AFFIDAVIT OF ZURIZADAI BALMAKUND

Plaintiff.

MNCIS No: 27-CR-20-12953

Attorney General File No.: 36.EC57.0227

MNCIS No: 27-CR-20-12951

Attorney General File No.: 36.EC56.0227

MNCIS No: 27-CR-20-12949

Attorney General File No.: 36.EC55.0227

VS.

Thomas Kiernan Lane,

J. Alexander Kueng,

Tou Thao,

Defendants.

ZURIZADAI BALMAKUND, being first duly sworn deposes and states:

- 1. I am one of the attorneys working in the above-captioned matter, and I submit this affidavit in response to this Court's request.
- 2. I was not the source of the information regarding alleged plea discussions with Co-Defendant Derek Chauvin's counsel that was reported on by the media on February 10 and 11, 2021.
- 3. The newspaper articles in question refer to former United States Attorney General William Barr's position on plea negotiations related to Co-Defendant, Derek Chauvin, Minnesota District Court No. 27-CR-20-12646. I do not know Attorney General William Barr, nor was I aware of these plea negotiations.
- 4. I do not know the source of the information in the articles referenced in $\P\P$ 2-3 above.

- 5. Accordingly, I neither had knowledge of, nor did I share information regarding, the above \$\quad \quad \text{2-3}\$ with anyone.
- 6. I did not order or consent to the disclosure of the information referenced in ¶¶2-3 above to the media.

FURTHER YOUR AFFIANT SAYETH NAUGHT.

ZURIZADAI BALMAKUND

Subscribed and sworn to before me

this 4 day of May 2021.

Notary Public

