



June 23, 2021

Honorable Peter A. Cahill
Judge of District Court
C731 Hennepin County Courthouse
300 South Sixth Street
Minneapolis, MN 55487

RE: State of Minnesota v. Thomas Kiernan Lane
Court File No. 27-CR-20-12951

Dear Judge Cahill:

In response to Matt Frank's 6-22-21 letter, the Lane defense is not requesting all use of force complaints from the Minneapolis Police Department since July 28, 2016. We are simply requesting all Sustained unreasonable use of force complaints since July 28, 2016, which I understand are a very small percentage of the total complaints.

Also, your honor, as you can see from attachments A & B of Frank's letter the policy regarding Duty to Intervene was amended on June 15, 2020: "Regardless of tenure or rank" . . . be subject to discipline to the same severity as if they themselves engaged in the prohibited, inappropriate or unreasonable use of force." The amendment approved by Arradondo was twenty days after Arradondo's press conference firing our client, Thomas Lane, a rookie who suggested twice to a 19 year veteran to roll George Floyd over. Amazing.

Respectfully submitted,

s/Earl P. Gray
Earl P. Gray

EPG/pkt