

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF HENNEPIN

FOURTH JUDICIAL DISTRICT

State of Minnesota,

Case Type: Criminal
Court File No. 27-CR-20-12953

Plaintiff,

vs.

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

J. Alexander Kueng,

Defendant.

TO: The above-named defendant and defendant's attorneys, Thomas Plunkett, U.S. Bank Center, 101 East Fifth Street, Suite 1500, St. Paul, MN 55101.

Pursuant to Rule 9.01, subd. 1, Minn. R. Crim. P., attached please find the following supplemental disclosure consisting of pages 14164-14344, 14374-14530, 14531-15017, 15049-15219, 20768-20938, 21106-21116, 21132-21140, 23925-25799, 26087-26167, 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: Redacted Employment Records

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: November 10, 2021

Respectfully submitted,

KEITH ELLISON
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/s/ Matthew Frank
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