

STATE OF MINNESOTA  
COUNTY OF HENNEPIN

DISTRICT COURT  
FOURTH JUDICIAL DISTRICT

State of Minnesota,

**AFFIDAVIT OF SUNDEEP IYER**

Plaintiff,

v.

J. Alexander Kueng,

Court File No.: 27-CR-20-12953

Thomas Kiernan Lane,

Court File No.: 27-CR-20-12951

Tou Thao,

Court File No.: 27-CR-20-12949

Defendants.

STATE OF NEW YORK    )  
                                  ) ss.  
KINGS COUNTY         )

SUNDEEP IYER, being first duly sworn, deposes and states:

1. I represent the State of Minnesota in the above captioned matter.
2. I was not the source of the information in the newspaper articles of February 10 and 11, 2021 regarding alleged plea discussions with Defendant Chauvin's counsel.
3. Those newspaper articles are about William Barr's asserted position on those plea negotiations. I have never spoken with William Barr about this case in any way, shape, or form. Nor was I ever aware of any involvement of William Barr in plea negotiations.
4. The February 11 article references a source with "direct knowledge" of the talks. I was not aware of the talks or the release of this information until I read about both

in February. Accordingly, I did not disclose any information about the plea negotiations to anybody.

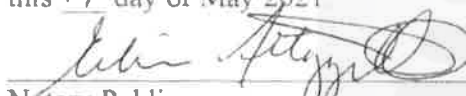
- 5. I do not know who was the source of the information referenced in these articles.
- 6. I also did not order or ratify the disclosure of this information, in any way, to any member of the media.

FURTHER YOUR AFFIANT SAYETH NAUGHT.

  
 \_\_\_\_\_  
 SUNDEEP IYER

Signed + Notarized in Kings County  
Pursuant to Executive Order 202.7

Subscribed and sworn to before me  
this 14<sup>th</sup> day of May 2021

  
 \_\_\_\_\_  
 Notary Public

**EILEEN FITZGERALD**  
 Notary Public, State of New York  
 No. 01F16350157  
 Qualified in Kings County  
 Certificate Filed New York County  
 Commission Expires November 7, 2024

MINNESOTA  
 JUDICIAL  
 BRANCH