

STATE OF MINNESOTA
COUNTY OF HENNEPIN

DISTRICT COURT
FOURTH JUDICIAL DISTRICT

Case Type: Criminal

State of Minnesota,

Plaintiff,

AFFIDAVIT OF MATTHEW FRANK

vs.

State v. Derek Michael Chauvin,

Court File No. 27-CR-20-12646

State v. J Alexander Kueng,

Court File No. 27-CR-20-12953

State v. Thomas Kiernan Lane,

Court File No. 27-CR-20-12951

State of Minnesota v. Tou Thao,

Court File No. 27-CR-20-12949

Defendants.

STATE OF MINNESOTA)
) ss.
COUNTY OF RAMSEY)

MATTHEW FRANK, being first duly sworn deposes and states:

1. I am an Assistant Attorney General representing the State in the above-captioned matter. I make this affidavit in support of the State's Motion for Joinder.

2. Submitted herewith as Exhibit 1 is a true and correct copy of the body worn camera video of former Minneapolis Police Officer J. Alexander Kueng.

3. Submitted herewith as Exhibit 2 is a true and correct copy of the body worn camera video of former Minneapolis Police Officer Thomas Lane.

4. Submitted herewith as Exhibit 3 is a true and correct copy of the body worn camera video of former Minneapolis Police Officer Tou Thao.

5. Submitted herewith as Exhibit 4 is a true and correct copy of the Bureau of Criminal Apprehension interview of former Minneapolis Police Officer Thomas Lane.

6. Submitted herewith as Exhibit 5 is a true and correct copy of the Bureau of Criminal Apprehension interview of former Minneapolis Police Officer Tou Thao.

7. Attached hereto as Exhibit 6 is a true and correct copy of the pertinent portions Minneapolis Police Department's Policy and Procedure Manual.

8. Attached hereto as Exhibit 7 is a true and correct copy of a pertinent portion of the Hennepin County Medical Examiner Autopsy report.

9. Attached hereto as Exhibit 8 is a true and correct copy of a Hennepin County Medical Examiner Press Release Report.

10. Attached hereto as Exhibit 9 is a true and correct copy of the Armed Forces Medical Examiner report.

11. Attached hereto pursuant to Minn. Stat. § 340A.08, subd. 3, is a true and correct copy of *Yusuf v. State*, No A17-0022, 2017 WL 3013420 (Minn. Ct. App. Sept. 19, 2017).

12. Attached hereto pursuant to Minn. Stat. § 340A.08, subd. 3, is a true and correct copy of *State v. Meeks*, No. 27-CR-09-8498, 2009 WL 8603557 (Minn. Dist. Ct. 2009).

13. Attached hereto pursuant to Minn. Stat. § 340A.08, subd. 3, is a true and correct copy of *State v. Carlson*, No. 27-CR-11-29606, 2013 WL 9792447 (Minn. Dist. Ct. 2013).

14. Attached hereto pursuant to Minn. Stat. § 340A.08, subd. 3, is a true and correct copy of *State v. Bellfield*, No. 27-CR-07-127152, 2008 WL 7650412 (Minn. Dist. Ct. 2008).

15. Attached hereto pursuant to Minn. Stat. § 340A.08, subd. 3, is a true and correct copy of *State v. McIntosh*, No. 27-CR-15-34795, 2016 WL 8711385 (Minn. Dist. Ct. 2016).

FURTHER AFFIANT SAYETH NAUGHT.

/s/ Matthew Frank
MATTHEW FRANK

Subscribed and sworn to before me
this 12th day of August 2020.

/s/ Ann M. Chalmers
Notary Public

My Commission Expires Jan. 31, 2022