

STATE OF MINNESOTA
COUNTY OF HENNEPIN

DISTRICT COURT
FOURTH JUDICIAL DISTRICT

Court File No. 27-CR-20-12951

State of Minnesota,

Plaintiff,

v.

Thomas Kiernan Lake,

Defendant.

**AFFIDAVIT OF EARL P. GRAY
IN SUPPORT OF CHANGE OF VENUE &
CONTINUANCE**

State of Minnesota)
) ss.
County of Ramsey)

Earl P. Gray, being first duly sworn upon oath, deposes and states as follows:

- (1) I have read 150 of the 265 eighteen-page juror questionnaires.
- (2) Because these questionnaires were completed before the related federal trial none of the prospective jurors were questioned about it.
- (3) Notwithstanding, approximately 90% of the 150 prospective jurors are either bias against our client Thomas Lane and/or need to be excused because of hardship or being afraid of the aftermath.
- (4) This Affidavit is made in support of our motion for change of venue and a continuance until at least after the federal court’s rulings and sentencing or in 2023 at an outstate venue.
- (5) The attempt to select a jury in Hennepin County violates my client’s right to an unbiased jury and fair trial.

"I declare under penalty of perjury that everything I have stated in this document is true and correct." Minn. Stat. § 358.116.

County and State where signed: Ramsey, MN

Dated on 4th day of May, 2022.

s/ Earl P. Gray

Earl P. Gray