

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF HENNEPIN

FOURTH JUDICIAL DISTRICT

Court File No. 27-CR-20-12953

State of Minnesota,

Plaintiff,

vs.

**DEFENDANT'S SUPPLEMENTAL OFFER  
OF PROOF IN SUPPORT OF MOTION TO  
ADMIT FLOYD'S MAY 6, 2019 INCIDENT**

J. Alexander Kueng,

Defendant.

**TO: THE HONORABLE PETER A. CAHILL, JUDGE OF HENNEPIN COUNTY  
DISTRICT COURT; AND KEITH ELLISON, ATTORNEY GENERAL OF  
MINNESOTA.**

**BACKGROUND**

The Defendant, by and through his attorney, previously joins Thomas Lane's motion to admit evidence related to Mr. Floyd's May 6, 2019 arrest in court file number 27-CR-20-12951 at index numbers 172-177. Subsequent to the original brief Counsel conducted independent investigation in the form of interviews with officer involved in those events. Attached as an offer of proof are interview summaries outlining anticipated testimony from officers involved in the May 6, 2019 arrest of George Floyd. See Exhibits A thru D.

Respectfully submitted,

Dated: November 23, 2020/s/ Thomas C. Plunkett

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