

STATE OF MINNESOTA
COUNTY OF HENNEPIN

DISTRICT COURT
FOURTH JUDICIAL DISTRICT

STATE OF MINNESOTA

PLAINTIFF,

V.

TOU THAO,

DEFENDANT.

**AFFIDAVITS REGARDING
DEFENDANT'S MOTION FOR
DISMISSAL AND
TO SANCTION KEITH
ELLISON, MATTHEW FRANK,
AND NEAL KATYAL**

COURT FILE NO. 27-CR-20-12949

TO: THE HONORABLE PETER A. CAHILL, JUDGE OF DISTRICT COURT, AND
MR. MATTHEW G. FRANK, ASSISTANT ATTORNEY GENERAL

Pursuant to the Court's request, please find the affidavits attorneys Robert M. Paule and Natalie R. Paule completed under oath prior to the May 13, 2021 hearing regarding their Motion for Dismissal and Sanctions.

Respectfully submitted,

Dated: This 17th day of May, 2021

/s/ Robert M. Paule
Robert M. Paule (#203877)
Robert M. Paule, P.A.
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STATE OF MINNESOTA
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STATE OF MINNESOTA

PLAINTIFF,

V.

TOU THAO,

DEFENDANT.

**AFFIDAVIT OF
NATALIE R. PAULE**

COURT FILE NO. 27-CR-20-12949

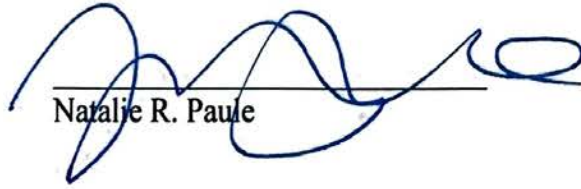
STATE OF MINNESOTA)
) ss.
COUNTY OF HENNEPIN)

Natalie R. Paule, being first duly sworn, states as follows:

1. I am an attorney for the above-named Defendant, as well as an officer of the court.
2. On or about February 10, 2021 The New York Times published an article titled *Why William Barr Rejected a Plea Deal in the George Floyd Killing.*
3. On or about February 11, 2021 the StarTribune published an article titled *Officials: Chauvin was ready to plead to 3rd-degree murder.*
4. In the two articles, it was reported that someone with direct knowledge of the plea deals told press that Chauvin was ready to accept a plea deal for his role in the death of George Floyd.
5. I was not the source of information to either paper.


Further your affiant sayeth naught.

Dated: February 15, 2021



Natalie R. Paule

Subscribed and sworn to before me
This 15th day of February, 2021.



Notary Public



WILLIAM J SWERESS
Notary Public, State of Ohio
My Commission Expires
November 29, 2025

STATE OF MINNESOTA
COUNTY OF HENNEPIN

DISTRICT COURT
FOURTH JUDICIAL DISTRICT

STATE OF MINNESOTA

PLAINTIFF,

V.

TOU THAO,

DEFENDANT.

**AFFIDAVIT OF
ROBERT PAULE**

COURT FILE NO. 27-CR-20-12949

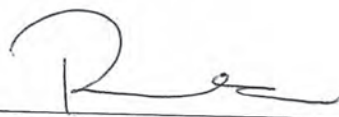
STATE OF MINNESOTA)
) ss.
COUNTY OF HENNEPIN)

Robert Paule, being first duly sworn, states as follows:

1. I am the attorney for the above-named Defendant, as well as an officer of the court.
2. On or about February 10, 2021 The New York Times published an article titled *Why William Barr Rejected a Plea Deal in the George Floyd Killing*.
3. On or about February 11, 2021 the StarTribune published an article titled *Officials: Chauvin was ready to plead to 3rd-degree murder*.
4. In the two articles, it was reported that someone with direct knowledge of the plea deals told press that Chauvin was ready to accept a plea deal for his role in the death of George Floyd.
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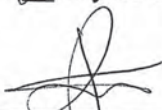
Further your affiant sayeth naught.

Dated: February 22nd, 2021



Robert Paule

Subscribed and sworn to before me
This 22nd day of February, 2021.



Notary Public

