

STATE OF MINNESOTA
COUNTY OF HENNEPIN

DISTRICT COURT
FOURTH JUDICIAL DISTRICT

State of Minnesota,

Case Type: Criminal
Court File No. 27-CR-20-12949

Plaintiff,

vs.

Tou Thao,

Defendant.

**SUPPLEMENTAL PROSECUTION
DISCLOSURE PURSUANT TO
RULE 9.01, SUBD. 1**

TO: The above-named defendant and defendant's attorney, Robert Paule, 920 Second Avenue South, Ste. 975, Minneapolis, MN 55402.

Pursuant to Rule 9.01, subd. 1, Minn. R. Crim. P., attached please find the following supplemental disclosure consisting of pages 50431-50435, incorporating by reference all previous disclosures:

- _____ Police/investigative report(s)
- _____ Statement(s) relating to the case
- _____ Statement(s) of the defendant and/or accomplice(s)
- _____ Social service report(s)
- _____ Search warrant(s)
- _____ Laboratory report(s)
- _____ Report(s) of medical or mental examination(s)
- _____ Criminal history information
- _____ Evidence receipt(s)
- _____ Diagram(s)/documentary exhibit(s)
- _____ Photograph(s), video tape(s), audio tape(s), and DVDs

- _____ Business/public record(s)
- _____ Spreigl material
- _____ Exculpatory material
- X Other: Consulting Expert Agreement; Draft, “There Is An Epidemic Affecting Black Men In America”

The State may, pursuant to Minn. R. Evid. 608(b) or any other rule, cross-examine defendant, if defendant testifies, about any of defendant's conduct that is disclosed as part of this, any previous, or any subsequent, disclosure.

PURSUANT TO MINN. R. CRIM. P. 9.03, SUBD. 4, DISCOVERY MATERIALS SHALL REMAIN IN THE CUSTODY OF DEFENSE COUNSEL, shall not be placed in defendant's custody, and shall be used by defense counsel only for the purpose of conducting that attorney's side of the case. Absent an order from the court issued upon written motion, failure to comply with Minn. R. Crim. P. 9.03, subd. 4, may result in sanctions pursuant to Minn. R. Crim. P. 9.03, subd. 8.

Dated: October 13, 2021

Respectfully submitted,

KEITH ELLISON
Attorney General
State of Minnesota
/s/ Matthew Frank
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