

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF HENNEPIN

FOURTH JUDICIAL DISTRICT

State of Minnesota,

AFFIDAVIT OF MATTHEW FRANK

Plaintiff,

v.

J. Alexander Kueng,

Court File No.: 27-CR-20-12953

Thomas Kiernan Lane,

Court File No.: 27-CR-20-12951

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 represent the State of Minnesota in the above captioned matter, and I make this affidavit in response to this Court's request.
2. I was not the source of the information in the newspaper articles of February 10 and 11, 2021 regarding alleged plea discussions with Defendant Chauvin's counsel.
3. Those newspaper articles are about William Barr's asserted position on those plea negotiations. I do not know William Barr and have never spoken with William Barr. Nor was I ever aware of any involvement of William Barr in plea negotiations. The February 11 article references a source with "direct knowledge" of the talks. I have no direct knowledge of those talks. Accordingly, I did not disclose any information about William Barr's role in plea negotiations to anybody, including any members of the State's prosecution team.

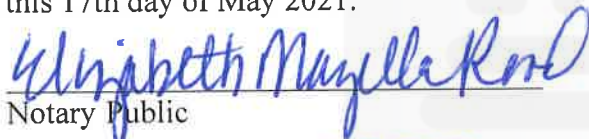
4. I did not know who was the source of the information in the articles.
5. I did not order of ratify the disclosure of this information to the media.
6. The success in picking a fair and impartial jury in March 2021 in *Sate v. Chauvin* renders moot defense counsels' claims for a change of venue or other relief based on the articles.

FURTHER YOUR AFFIANT SAYETH NAUGHT.



MATTHEW FRANK

Subscribed and sworn to before me
this 17th day of May 2021.



Notary Public



MINNESOTA
JUDICIAL
BRANCH