

ARDEN INVESTIGATION, INC.

LICENSED PRIVATE INVESTIGATORS

PERSONALLY SERVED1220 Karth Lake Drive
St. Paul, MN 55112TELEPHONE 651-235-3837
FAX 651-633-4720

March 14, 2022

Casey Carl
Minneapolis City Clerk
Minneapolis City Hall
350 S. Fifth Street
Minneapolis, MN 55408**HAND DELIVERED****FILED**
MINNEAPOLIS, MINN
2022 MAR 15 PM 12:12
CITY CLERK DEPARTMENT**Re: Subpoena Duces Tecum**
State of Minnesota v. J. Alexander Kueng
Hennepin County District Court File 27-CR-20-12953

Dear Mr. Carl:


Enclosed please find two subpoenas duces tecum for production of documents in the state trial of J Alexander Kueng. I am serving this subpoena on behalf of Thomas C. Plunkett, the lawyer representing Mr. Keung.

One subpoena is for the production of field training records for Inspector Katie Blackwell. The second subpoena is for the production of incident detail reports related to police reports written by J. Alexander Kueng during his field training.

To facilitate the production of the subpoenaed documents, I can pick them up from your officer or from any other designated office to facilitate matters. If you decide to deliver the documents to Mr. Plunkett's office, please contact me so that I can make sure either Mr. Plunkett or I are present on the date and time of the expected deliver.

If you have any questions, you can contact me by email at susanlynnjohnson@msn.com or by phone at 651-235-3837. Your cooperation is greatly appreciated.

Yours truly,



Susan L. Johnson

SUBPOENA in a Criminal Case
(COMMAND TO APPEAR)

Minn. R. Crim. P. 22

State of Minnesota	District Court
County of Hennepin	Fourth Judicial District Case No. 27-CR-20-12953

Plaintiff State of Minnesota	VS	Defendant J. Alexander Kueng
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WITNESS Casey Carl, Minneapolis City Clerk <hr/> Name City Hall, 350 S. Fifth St. <hr/> Address Minneapolis, MN 55408 <hr/> City State Zip	<input type="checkbox"/> DEPOSITION
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You are hereby commanded to appear as a witness to give testimony on the date, time and place indicated below, and from time to time thereafter as may be required.

DUCES TECUM
You are commanded to produce the following items, records, or documents:

Date	April 15, 2022
Time	9:00 a.m.
Address	Thomas Plunkett Law Office 101 E. 5 th St., Suite 1500 St. Paul, MN 55101
Witness For	Defendant
Type Of Case	Criminal
Person requesting Subpoena	Name Thomas C. Plunkett
Optional	Upon Receipt of this subpoena, please call: 651-235-3837

SCHEDULE ATTACHED

CITY CLERK DEPARTMENT
 2022 MAR 15 PM 12:14
 FILED
 MINNEAPOLIS, MINN

WARNING: FAILURE TO OBEY A SUBPOENA WITHOUT BEING EXCUSED IS A CONTEMPT OF COURT

<i>/s/ THOMAS C. PLUNKETT</i>	
Signature of Court Administrator / Attorney for the State / <u>Attorney for the Defendant</u> (circle one)	Date: March 14, 2022
THOMAS C. PLUNKETT, # 260162, 101 EAST FIFTH ST., SUITE 1500, SAINT PAUL, MN 55101 PHONE 651-222-4357	
Print Name, Attorney Registration number, Office Address and Phone number (if issued by Attorney as an Officer of the Court)	
	SEAL (if issued by Court Administration)

Court Use Only	
Returned and Filed _____	By _____
Date	Court Administrator/Deputy

**SUBPOENA DUCES TECUM
ATTACHMENT 1**

You are commanded to produce the following items, records or documents:

The incident detail reports for the following police reports

Date	Officers	Report #
12/18/19	Ketchmark & Kueng	2019-370663
1/9/20	Woods & Kueng	2020-7908
1/10/20	Woods & Kueng	2020-8133
1/14/20	Woods & Kueng	2020-11416
1/15/20	Woods & Kueng	2020-12210
2/4/20	Nerling & Kueng	2020-31596
2/4/20	Nerling & Kueng	2020-31784
2/15/20	Cape & Kueng	2020-41488
2/24/20	Cape & Keung	2020-49510
2/24/20	Cape & Kueng	2020-50219
3/1/20	Cape & Keung	2020-55010
3/7/20	Chauvin & Kueng	2020-61871
3/8/20	Chauvin & Kueng	2020-62907
3/10/20	Jensen (Allen) & Kueng	2020-64759
3/10/20	Jensen (Allen) & Kueng	2020-65093
3/11/20	Chauvin & Kueng	2020-65958
3/13/20	Chauvin & Kueng	2020-68012
3/13/20	Chauvin & Kueng	2020-68063
3/17/20	Chauvin & Kueng	2020-71901
3/17/20	Chauvin & Kueng	2020-71838
3/20/20	Chauvin & Kueng	2020-74589
3/24/20	Chauvin & Kueng	2020-78199
3/28/20	Chauvin & Kueng	2020-81866
3/29/20	Chauvin & Kueng	2020-82525
3/29/20	Chauvin & Kueng	2020-82674
3/30/20	Chauvin & Kueng	2020-83402
4/5/20	Chauvin & Kueng	2020-89319
4/6/20	Chauvin & Kueng	2020-90422
4/15/20	Chauvin & Kueng	2020-98907
4/16/20	Chauvin & Kueng	2020-99254
4/27/20	Chauvin & Kueng	2020-110815
4/27/20	Chauvin & Kueng	2020-111043
4/28/20	Chauvin & Kueng	2020-112199
4/27/20	Chauvin & Kueng	2020-110269

5/5/20	Chauvin & Kueng	2020-119490
5/8/20	Chauvin & Kueng	2020-122697
5/16/20	Blair & Kueng	2020-131219
5/17/20	Chauvin & Kueng	2020-131607
5/18/20	Chauvin & Kueng	2020-131874
5/22/20	Chauvin & Kueng	2020-137240
5/22/20	Chauvin & Kueng	2020-137496

SUBPOENA INFORMATION

PLEASE READ CAREFULLY

SERVICE of a subpoena may be made by the sheriff, by a deputy, or any other person who is not a party and who is not less than 18 years of age. Service of a subpoena upon a person named therein shall be made by delivering a copy thereof to such a person or by leaving a copy at the person's usual place of abode with some person of suitable age and discretion then residing therein. (Rule 22.03, Rules of Criminal Procedure)

FEES to be paid to witnesses shall be as follows: (M.S. 357.22 or M.S. 357.24)

- 1) For attending in any action or proceeding in any court of record or before any officer, person or board authorized to take the examination of witnesses, \$20 for each day.
- 2) For travel in going to and returning from the place of attendance, to be estimated from the witness's residence, if within the state, or from the boundary line of the state where the witness crossed the same, if from out of state, 28 cents per mile. (Additional fees may be available for out of state witnesses.)

Travel and attendance fees do not need to be tendered in advance. A witness attending on behalf of the state or a public defender may obtain payment of fees by filing a certificate (set forth below) with the court administrator. Other witnesses must obtain payment of fees from the party requesting their attendance, unless payment is approved by the court.

S T A T E	IF YOU WERE SUBPOENAED BY THE STATE, COMPLETE THIS SECTION:
	To receive payment as a witness for the state, you must complete the following certificate, have the prosecutor sign it, and then take the subpoena to the court administrator's office, after you testify. Payment will be mailed as soon as possible.
	I certify that I attended as a witness for the state on the following date(s) _____, and that I traveled _____ miles round trip.
W I T N E S S	Date _____ Address _____ City, State, Zip _____ Signature _____ Social Security Number _____
	I certify that the attendance of this witness was necessary. _____ Prosecuting Attorney

D E F E N S E	IF YOU WERE SUBPOENAED BY THE DEFENDANT, COMPLETE THIS SECTION:
	To receive payment as a witness for the Defendant, you must complete the following certificate and give this subpoena to the defendant's attorney.
	I certify that I attended as a witness for the defense on the following date(s) _____, and that I traveled _____ miles round trip for attendance on the above date(s).
W I T N E S S	Date _____ Address _____ City, State, Zip _____ Signature _____ Social Security Number _____
	I certify that the attendance of this witness was necessary. _____ Public Defender
	Court approval for defense witness: _____
	Court approval for defense witness: _____
	Court approval for parent/guardian accompanying juvenile: _____ (See NOTES below)

PLEASE NOTE: In criminal cases, a witness authorized to receive payment of attendance and travel fees through the court administrator may also obtain payment of reasonable expenses actually incurred for meals, loss of wages, and child care not to exceed \$60 per day, by filing a separate application with the court administrator. If approved, expenses will be included with the attendance and travel fees. (M.S. 357.24)

PLEASE NOTE: In any proceeding where a parent or guardian attends the proceeding with a minor witness and the parent or guardian is not a witness, one parent or guardian shall be compensated in those cases where witness compensation is mandatory under sections M.S. 357.22 or M.S. 357.24, and may be compensated when compensation is discretionary under those sections. No more than a combined total of \$60 may be awarded to the parent or guardian and the minor witness. (M.S. 357.242)

Office Use Only	Certified for payment _____ Date _____ _____ Court Administrator/Deputy	Fees _____ Mileage _____ Expense _____ Total _____
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SUBPOENA in a Criminal Case
(COMMAND TO APPEAR)

Minn. R. Crim. P. 22

State of Minnesota	District Court
County of Hennepin	Fourth Judicial District Case No. 27-CR-20-12953

Plaintiff State of Minnesota	VS	Defendant J. Alexander Kueng
---------------------------------	----	---------------------------------

<p>WITNESS Casey Carl, Minneapolis City Clerk Name City Hall, 350 S. Fifth St. Address Minneapolis, MN 55408 City State Zip</p> <p>You are hereby commanded to appear as a witness to give testimony on the date, time and place indicated below, and from time to time thereafter as may be required.</p> <table border="1" style="width:100%; border-collapse: collapse;"> <tr><td>Date</td><td>April 15, 2022</td></tr> <tr><td>Time</td><td>9:00 a.m.</td></tr> <tr><td>Address</td><td>Thomas Plunkett Law Office 101 E. 5th St., Suite 1500 St. Paul, MN 55101</td></tr> <tr><td>Witness For</td><td>Defendant</td></tr> <tr><td>Type Of Case</td><td>Criminal</td></tr> <tr><td>Person requesting Subpoena</td><td>Name Thomas C. Plunkett</td></tr> <tr><td>Optional</td><td>Upon Receipt of this subpoena, please call: 651-235-3837</td></tr> </table>	Date	April 15, 2022	Time	9:00 a.m.	Address	Thomas Plunkett Law Office 101 E. 5 th St., Suite 1500 St. Paul, MN 55101	Witness For	Defendant	Type Of Case	Criminal	Person requesting Subpoena	Name Thomas C. Plunkett	Optional	Upon Receipt of this subpoena, please call: 651-235-3837	<p><input type="checkbox"/> DEPOSITION</p> <p>DUCES TECUM You are commanded to produce the following items, records, or documents:</p> <p>All Minneapolis Police Department field training records including ROPES (Recruit Officer Performance Evaluations) for Inspector Katie Blackwell who started with MPD in 1999 and was officially hired in 2000. At the time Inspector Blackwell was hired she may have had a different last name.</p> <p><input type="checkbox"/> SCHEDULE ATTACHED</p>
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Print Name, Attorney Registration number, Office Address and Phone number (if issued by Attorney as an Officer of the Court)	

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Office Use Only	Certified for payment _____	Fees _____	
	Date _____	Mileage _____	
		Expense _____	
	Court Administrator/Deputy _____	Total _____	