

STATE OF MINNESOTA
COUNTY OF HENNEPIN

DISTRICT COURT
FOURTH JUDICIAL DISTRICT

State of Minnesota,

Case Type: Criminal
Court File No. 27-CR-20-12951

Plaintiff,

vs.

Thomas Kiernan Lane,

Defendant.

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

TO: The above-named defendant and defendant's attorney, Earl Gray, 1st Bank Building, 332 Minnesota Street, Suite W1610, Saint Paul, Minnesota 55101.

Pursuant to Rule 9.01, subd. 1, Minn. R. Crim. P., attached please find the following supplemental disclosure consisting of pages 38451-38845, 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: Jpay letters, D. Chauvin mail, Property Release/Disposal Receipt, Aug. 7, 2020 letter to U.S. Attorney's Office, Notice of Ludermill Hearing, Review Panel Recommendation, Office of Police Conduct Review, MPD Employee Complaint Profile Card Non-Public Summary, Oct. 26, 2018 letter to Officer Moen & Officer Thao, Investigative Summary, May 8, 2018 letter to Jenna Nelson.

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 28, 2020

Respectfully submitted,

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