

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF HENNEPIN

FOURTH JUDICIAL DISTRICT

Court File No. 27-CR-20-12646

State of Minnesota,

Plaintiff,

vs.

**DEFENDANT'S NOTICE
OF MOTION AND
MOTION FOR
DISCLOSURE**

Derek Michael Chauvin,

Defendant.

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

NOTICE OF MOTIONS

PLEASE TAKE NOTICE that on September 11, 2020, or as soon as this matter can be heard, the Defendant, Derek Michael Chauvin, through his attorney Eric J. Nelson, Halberg Criminal Defense, will move this Court for the following relief:

MOTIONS

1. Disclosure of body worn camera video/audio from MPD CN-201 9-127538 from the arrest of Mr. Floyd on May 6, 2019.
2. Any and all files pertaining to Mr. Floyd's cooperation as an informant (CI) for the Minneapolis Police, FBI or any other state or federal law enforcement agency either before or after May 6, 2019. This includes information from ongoing and closed investigations, documents or other information prepared as part of the vetting process to become an informant/cooperator and any police report/case materials where Mr. Floyd worked as a cooperator, CI, CRI, concerned citizen informant or other status.
3. Any and all files documenting Mr. Floyd's activity as a gang member or gang affiliate within the past 5 years.

4. Any and all information in the possession of the Hennepin County Attorney or other state or federal prosecuting agency regarding Mr. Floyd's May 6, 2019 drug possession/sale investigation or other reports generated following the submission of "this case to the Hennepin County Attorneys (sic) office for charging considerations for FLOYD." (*See* Exhibit A at Bates 6356).
5. Disclosure of the training materials previously disclosed with active imbedded links to the video portions of the presentations.
6. A copy of the State's documents index for all disclosures made to date.
7. Any other relief deemed fair and equitable by the Court.

This motion is based upon the files and records in this case, the Minnesota Statutes, the Minnesota Rules of Criminal Procedure, the United States and Minnesota Constitutions and upon such other and further points and authorities as may subsequently be presented to the Court.

Respectfully submitted,

HALBERG CRIMINAL DEFENSE

Dated: August 28, 2020

/s/ Eric J. Nelson
Eric J. Nelson
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