

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF HENNEPIN

FOURTH JUDICIAL DISTRICT

Court File No.: 27-CR-20-12646

State of Minnesota,

Plaintiff,

Vs.

Derek Michael Chauvin,

Defendant

**DEFENDANT'S REQUEST
FOR DISCLOSURE**

Defendant, by and through the undersigned attorney, hereby requests that the prosecution make the following disclosures and permit defense counsel to inspect and reproduce relevant written or recorded statements, documents, and tangible objects pursuant to Rules 7 and 9 of the Minnesota Rules of Criminal Procedure; Minn. Stat. § 169.14. subs. 9 and 10; Brady v. Maryland, 373 U.S. 83 (1963); and United States v. Agurs, 427 U.S. 97 (1976), and demands the presence at trial of anyone who drew or took blood or urine samples from the defendant, as well as the analyst who analyzed same, pursuant to Minn. Stat. § 634.15.

1. The names and addresses of the persons whom the prosecution intends to call as witnesses at trial, together with their prior record of convictions, if any, within the prosecution's actual knowledge.
2. Any relevant written or recorded statements and any written summaries of the substance of relevant oral statements made by witnesses to agents of the prosecution.
3. Any relevant written or recorded statements made by the defendant and accomplices within the possession or control of the prosecution.
4. The substance of any oral statements made by the defendant and accomplices, whether before or after arrest, which the prosecution intends to offer into evidence at trial.
5. Any books, papers, documents, photographs, videotapes, and tangible objects which the prosecution intends to offer into evidence at trial, or any evidence relative thereto which the prosecution intends to offer at trial.

6. Any results or reports of physical or mental examinations, scientific tests, experiments, or comparisons made in connection with the offense(s) charged against the defendant.
7. Any records of prior convictions of the defendant that are known to the prosecution.
8. Any material or information within the prosecution's possession and control that relates to the guilt or innocence of the defendant, tends to negate or reduce the culpability of the defendant as to the offense(s) charged, or may mitigate punishment, pursuant to Minn. R. Crim. P., Rule 9(6); Brady v. Maryland, 373 U.S. 83 (1963); and United States v. Agurs, 427 U.S. 97 (1976).
9. Any and all other documents or information not specifically requested that are subject to disclosure under the Minnesota Rules of Criminal Procedure.

Respectfully submitted,

HALBERG CRIMINAL DEFENSE

Dated: June 8, 2020

/s/ Eric J. Nelson

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