

STATE OF MINNESOTA
COUNTY OF HENNEPIN

DISTRICT COURT
FOURTH JUDICIAL DISTRICT

STATE OF MINNESOTA,

**NOTICE OF MOTION
AND MOTION TO
COMPEL DISCOVERY**

PLAINTIFF,

V.

TOU THAO,

DEFENDANT.

COURT FILE NO. 27-CR-20-12949

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

NOTICE OF MOTION

Please take notice, that on September 11, 2020 at 9:00 am, or as soon thereafter as counsel may be heard, Tou Thao (“Mr. Thao” herein) will move the Court as follows.

MOTION

Mr. Thao respectfully moves the Court for an order compelling the State to disclose the following:

1. The complete Minneapolis Police Department disciplinary files on Derek Chauvin;
2. Disclosure of body worn camera video/audio from MPD CN-2019-127538 from the arrest of George Floyd (“Mr. Floyd” hereinafter) on May 6, 2019;
3. Any and all files pertaining to Mr. Floyd’s cooperation as an informant for the Minneapolis Police, FBI or any other state, local, 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 similar status;
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 Bates 006356;
 5. Disclosure of the training materials previously disclosed with active imbedded links to the video portions of the presentations; and
 6. A copy of the State's documents index for all disclosures made to date.

Additionally, Mr. Thao respectfully joins in the other discovery motions filed by any codefendant in this matter

Respectfully submitted,

Dated: This 28th day of August, 2020

/s/ Robert M. Paule
Robert M. Paule (#203877)
Robert M. Paule, P.A.
920 Second Avenue South, Suite 975
Minneapolis, MN 55402
T: (612) 332-1733
F: (612) 332-9951

Natalie R. Paule (#0401590)
Paule Law P.L.L.C.
5100 West 36th Street
P.O. Box 16589
Minneapolis, MN 55416
nrp@paulelaw.com