

STATE OF MINNESOTA  
COUNTY OF HENNEPIN

DISTRICT COURT  
FOURTH JUDICIAL DISTRICT

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State of Minnesota,

Court File No. 27-CR-20-12951

Plaintiff,

v.

**DEFENDANT THOMAS LANE  
NOTICE OF INTENT TO OFFER  
CHARACTER EVIDENCE**

Thomas Kiernan Lane,

Defendant.

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The State in its Amended Notice of Intent to Offer Other Evidence agrees that it will be required to prove “certain states of mind and disprove a claim of reasonable force”. The State’s burden as to Thomas Lane is that Lane knew that Chauvin was committing a third degree felony assault and with criminal intent aided Chauvin in the assault knowing that the force used by Chauvin was unreasonable.

With respect to criminal intent, knowledge, and reasonable force, Thomas Lane intends, pursuant to Rules 404(a)(1), 405(b), and 406 of the Minnesota Rules of Evidence, to put his pertinent trait of character for peacefulness in evidence. Lane will offer a body worn camera (Exhibit A), along with a transcript (Exhibit B), of him on January 23, 2020 at 3:40 a.m. working as a trainee officer. The body worn camera will show the jury that on this date and time Thomas Lane was involved in an encounter with a homeless Black individual in a wheelchair. The gentleman, named Quinton, was alone in his motorized wheelchair with a dead battery. Lane proceeded to assist the man and ultimately walked, pushing the wheel chair, through a snow, ice, rain mixture in the January winter cold to the police precinct where the gentleman could rest

inside a warm building while his motorized wheelchair charged.

This specific instance of conduct of Lane's character will be strong circumstantial evidence that Lane did not with criminal intent assist in the murder of George Floyd.

Dated this 30<sup>th</sup> day of September, 2020.

Respectfully Submitted,

s/ Earl Gray

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Earl P. Gray  
Attorney No. 37072  
332 Minnesota Street  
Suite W-1610  
St. Paul, Minnesota 55101  
(651) 223-5175

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Thomas Lane: (silence)

Thomas Lane: Probably park right here. [inaudible 00:00:00]

Thomas Lane: How you doing, man?

Quentin: Scooter died on me.

Thomas Lane: You got a way to get it charged, or you need a charge?

Quentin: Yeah, I need a charge.

Thomas Lane: You got a cord on you?

Quentin: A what? Yeah, I got a battery right here. Charger in the back.

Thomas Lane: Okay.

Quentin: But, I need to get somewhere with an input so I can charge it up. Somewhere I can eat or something and charge it up.

Thomas Lane: We got Starbucks right down there, but-

Quentin: I'm trying to get to the Harbor Lights too.

Thomas Lane: Oh, okay. That's a ways. Are there places that have outlets around?

Quentin: Used to.

Thomas Lane: Not bus stations or bus stops?

Speaker 3: Can't remember the last place...

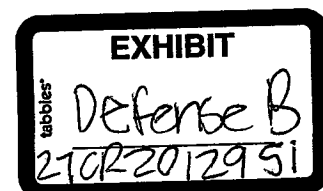
Thomas Lane: Dude, I can pull you under here so you're not in the snow, or is it completely...  
[inaudible 00:02:03] Oh, man, that's... This is all just ice right here too. Are those wheels even moving? Yeah? [crosstalk 00:02:21] There we go, so you're at least not in the rain right now.

Quentin: Okay. Thank you.

Thomas Lane: You got it. All right. Where's the charging stuff?

Quentin: Right here in this [inaudible 00:02:37] bag.

Thomas Lane: Right here?



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Quentin: Yeah.

Speaker 3: How long does it need to charge before you can move?

Quentin: A few seconds, I mean, in order for me-

Speaker 3: Does it pop out?

Quentin: Huh? It ain't going to go far, but it'll-

Speaker 3: Does this pop out though?

Thomas Lane: Is that the battery here, or is that the-

Quentin: Yeah, that's the battery and the charger.

Thomas Lane: Where's the battery go into it then?

Quentin: This here go into this part, and the cord go into a-

Speaker 3: How long does it take to charge?

Quentin: About 20 minutes.

Speaker 3: 20 minutes?

Quentin: Yeah. [inaudible 00:03:15] What bus I can jump on or something to get to this Harbor Lights?

Speaker 3: What was the question?

Thomas Lane: How to get to Harbor Lights by bus. I think the light rail gets you closest, right?

Quentin: Okay. Light rail.

Speaker 3: I don't think there's really any buses.

Thomas Lane: I'd say light rail to the twins.

Speaker 3: Then only one I can think is the free ride, but I don't know if he'll be able to hop on it. Are you able to get onto the light rail free ride there?

Quentin: Yes sir.

Thomas Lane: Well, he's got a plan, so we'll see. You're good for now? You're warm enough and everything?

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Quentin: Yes sir.

Thomas Lane: All right.

Quentin: I just need to be able to get on the bus [inaudible 00:03:58] to my destination. I appreciate everything you're doing.

Thomas Lane: Yeah, no problem, man. It's a bummer of a night to have it go dead on you, too.

Quentin: Huh?

Thomas Lane: This is a bummer of a night to have it...

Quentin: Yeah. Man, I think something's going wrong with the charger too, because it'll charge for a minute, and then it'll die out on me.

Thomas Lane: Oh.

Quentin: I may have to get that checked out too.

Thomas Lane: You got a service thing for it, or plan or anything?

Quentin: Well, Harbor Lights, and then I got [Gill 00:04:25], I'm a client of Gill's.

Thomas Lane: Okay.

Quentin: They want me to come to this Harbor Lights.

Thomas Lane: Yeah, because if that's... Sometimes; those batteries get blown out, and they don't... Yeah, like you're saying, it doesn't hold a charge. [crosstalk 00:04:36] Yeah, go ahead.

Quentin: I think that's what's going on. I think it's dying out on me.

Thomas Lane: I didn't realize this was the entrance. Whoops. Oh, whatever.

Quentin: That's why they had me over there, but...

Thomas Lane: Oh, did they come out and say something?

Quentin: Yeah. I tried to get in there and get something to eat. I thought they had a plugin. I was going to plug in while I'm eating.

Thomas Lane: Yeah. Is there a way to put it in neutral so I can move you easier?

Quentin: They said it's got a button on each motor that you push.

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Thomas Lane: Okay.

Speaker 3: She's plugged in right now, so we'll give it a little bit to charge, all right?

Quentin: Huh?

Thomas Lane: I didn't realize it's the entrance to [crosstalk 00:05:20]

Speaker 3: No, I know. Oh, you need to plug it into that? So it is charged already?

Quentin: No, so it can charge.

Speaker 3: No, I know. I have it plugged in. You can charge it from that?

Quentin: It got to be. The white cord-

Speaker 3: Right, I get that, but is your battery dead?

Quentin: Yes.

Speaker 3: Okay. So, it needs to charge first before we can plug it back in, right?

Quentin: No, it needs-

Thomas Lane: That battery is in here? That's not the battery?

Quentin: Right.

Thomas Lane: Oh.

Speaker 3: So, what is that then?

Quentin: Huh?

Speaker 3: What is it you handed over?

Quentin: That was the charger to charge this.

Speaker 3: Oh, I got you. Is that charged? Is that fully charged then?

Quentin: Yeah, I mean [crosstalk 00:05:53] acting up, yeah.

Speaker 3: Okay. Where does it plug?

Quentin: The white cord plugs in here. The white cord [inaudible 00:06:06] Oh, I'm sorry, sir.

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Thomas Lane: No, you're good. You got to get somewhere else so you can plug that in, and then plug it into here.

Quentin: Right.

Thomas Lane: Okay.

Quentin: They said they didn't have no input.

Thomas Lane: Huh. We'll see if he's got another plan. Here, let me see if I can... You guys coming in here?

Speaker 4: Yeah.

Thomas Lane: All right. Yeah, go ahead.

Speaker 4: Awesome. Thank you.

Thomas Lane: I thought this was the exit. That's why I was-

Quentin: I was going to go in here and buy something to eat and charge up.

Thomas Lane: Here, what do I, press the thing on this side? This end?

Quentin: Let me see. Yeah, you see that button there?

Thomas Lane: Where at?

Quentin: Right there.

Thomas Lane: On the back?

Quentin: Yeah, right here.

Thomas Lane: Can you do it?

Quentin: Yeah, I can. My hands are froze.

Thomas Lane: Where? Here?

Quentin: That button. No.

Thomas Lane: This?

Quentin: Right here.

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Speaker 3: So, is it charging now then?

Thomas Lane: Let me see. Oh, there.

Quentin: Yes.

Thomas Lane: Freewheel.

Speaker 3: So, does this have to go to this [crosstalk 00:07:26]

Quentin: Yes sir.

Speaker 3: Oh, I gotcha now. I'm putting it together.

Thomas Lane: Let's see here. I'm going to try to move him. Oh, that's a lot easier.

Speaker 3: I'm trying to think where...

Thomas Lane: There we go. Yeah, Starbucks?

Speaker 3: Starbucks is on the end of that block.

Thomas Lane: Is this one? I thought it was right there.

Speaker 3: It's closed.

Thomas Lane: Okay. 10:15?

Speaker 3: I'm trying to think of where there's a fricking...

Thomas Lane: Precinct's two blocks away.

Speaker 3: You going to push him all the way there?

Thomas Lane: Yeah. No, probably not. Not in this weather.

Speaker 3: We could. I guess that's not the worst option.

Thomas Lane: I mean, yeah, if that's... I guess, I don't know the little ins and outs of where would be a good spot.

Speaker 3: [inaudible 00:08:18]

Thomas Lane: Yeah.



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Speaker 3: They've been used and abused. Yeah, I mean, that could work if you want to try that, just put your jacket on.

Thomas Lane: Okay.

Speaker 3: Get him to the precinct, and then we'll have him charge there. All good from there.

Thomas Lane: Okay. In the front hall? Can you get in the front door though?

Speaker 3: Should be able to.

Thomas Lane: Isn't there stairs?

Speaker 3: There's a slant in the front.

Thomas Lane: Okay. To go into the precinct?

Speaker 3: Mm-hmm (affirmative).

Thomas Lane: Then, how about getting to Harbor from there?

Speaker 3: He'll just go down 1st Ave. [inaudible 00:08:54] be right there.

Thomas Lane: What do you think? Go down to 4th and then back?

Speaker 3: Go down 5th all the way to [inaudible 00:09:07] parking lot, and then [inaudible 00:09:10]

Thomas Lane: The back?

Speaker 3: Probably easier.

Thomas Lane: By the Gay Nineties and Auggies? [inaudible 00:09:15] Oh, you can get through there? Okay.

Speaker 3: [inaudible 00:09:30] plugged in.

Thomas Lane: Yeah.

Speaker 3: I'll just trail you. [inaudible 00:09:44]

Thomas Lane: Yeah. All right. All right. What's your first name, sir?

Quentin: [inaudible 00:09:55]

Thomas Lane: Holy shit. Quentin?

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Quentin: Yes.

Thomas Lane: All right, Quentin, we're going to go on a little trip here.

Quentin: Okay.

Thomas Lane: He's just going to trail us. We're just going to go to the precinct, and we can go in the front. They got a charger there, so we'll just charge that.

Quentin: Oh, okay.

Thomas Lane: Are you buckled in? I don't want you to fall out or anything, right? How fast you go on this thing?

Quentin: About five miles an hour.

Thomas Lane: Oh, okay. It ain't got a turbo charger or anything?

Quentin: No.

Thomas Lane: What were you doing over this side?

Quentin: Well, [inaudible 00:10:41] me to come over here, but they kicked me out of the Higher Ground in Minneapolis.

Thomas Lane: Okay.

Quentin: Said I provoked someone to a slap.

Thomas Lane: Oh.

Quentin: My caseworker was going to fight that.

Thomas Lane: Okay.

Quentin: I have to go along with the rules and regulations and get off of their property.

Thomas Lane: But, you're staying at Harbor right now, right?

Quentin: Yeah, I'm going to go over to Harbor and stay until they [inaudible 00:11:13]

Thomas Lane: Yeah.

Quentin: That's what my caseworker told me to do.

Thomas Lane: Yeah. [inaudible 00:11:21] Hey, did you code 4 us? Code 4? Oh, boy. There's some snow.

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Quentin: I appreciate everything you're doing for me.

Thomas Lane: Yeah, man. Don't worry about it.

Quentin: I'm trying to get help, but nobody [inaudible 00:11:51]

Thomas Lane: What's that?

Quentin: I said I was trying to get help, but wouldn't nobody say nothing to me.

Thomas Lane: Yeah, that's kind of messed up. Not going to lie. That ain't right.

Quentin: Kept walking past me. [inaudible 00:12:04]

Thomas Lane: Well, the precinct is warm, so at least you got... It's not like you're charging outside somewhere. You hang out there for a little bit.

Quentin: Okay.

Thomas Lane: You know how to get to Harbor from there, right?

Quentin: No, I don't.

Thomas Lane: Okay. We can... It's basically just down, I think it's on 1st. It ain't far.

Quentin: Oh, it ain't far from the precinct?

Thomas Lane: Yeah.

Quentin: Okay.

Thomas Lane: Geez.

Quentin: [inaudible 00:12:40]

Thomas Lane: Let me see here. I just don't want to have you go forward.

Quentin: No, I won't.

Thomas Lane: You're good?

Quentin: Yeah. I'm good.

Thomas Lane: Ready?

Quentin: Yeah. Too heavy.

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Thomas Lane: I got zero traction. Here, I'm going to turn you around and just go backwards over it. Yeah, it's slick.

Quentin: Yeah. Man, I just wonder what I'd be doing without y'all.

Thomas Lane: I have no traction at all. These boots, it's just like skating rink. These boots are supposed to be nonslip. I'm going to have to return them. What's that? Well, it says nonslip.

Speaker 3: [inaudible 00:13:40]

Thomas Lane: Oh, my gosh, why don't they come salt? There we go. All right. We're going to go straight across the light rail station.

Quentin: [inaudible 00:14:13]

Thomas Lane: What's that?

Quentin: I don't have no steering.

Thomas Lane: Oh, yeah. You're good. You got me here. All right. Lean back. There we go. See if I can get across the street in this light. Oh, there we go. You go through that puddle all right?

Quentin: Yep.

Thomas Lane: There we go. We're going to cut through on the right over here.

Quentin: All right.

Speaker 5: That's nice.

Speaker 6: What's up OG?

Quentin: I got a ride.

Speaker 6: It went dead on you?

Thomas Lane: Yeah, it's out.

Quentin: It went dead on me.

Thomas Lane: All right. Oh, man. Let me see here. How deep is this? Got to go around the block. No, it ain't bad. Oh. Fuck.

Speaker 7: What, are you trying to get over?

Thomas Lane: Yeah.

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Speaker 7: You probably going to have to use this.

Thomas Lane: This? I don't know if I trust that.

Speaker 7: Unless you going to take him on the other side.

Thomas Lane: This? I think it's too wide. Let's see.

Quentin: Yeah, it'll work.

Thomas Lane: I just don't want you falling in the puddle like this. [crosstalk 00:16:04]

Speaker 7: Yeah, you can get it.

Quentin: You can do it.

Speaker 7: You can get it.

Thomas Lane: All right.

Speaker 7: Not too fast. Come on. Come on. [inaudible 00:16:17] Come on. Come on. Come on. Come on. Come on. Come on.

Thomas Lane: Look at that.

Speaker 7: Yeah, I knew it would go.

Thomas Lane: All right. Thank you, man.

Speaker 7: You welcome.

Quentin: [inaudible 00:16:34]

Thomas Lane: This is where it might get tricky. We're going to go down here, and to the front. Oh, boy. You want to try and pull? I think we got to turn around again. I think that front wheel can't get over it, and pull it. Look at that puddle we went over. Look at that. We went on that ramp. That puddle is five, six inches deep.

Quentin: Yeah, it was.

Thomas Lane: You good?

Quentin: Yeah.

Thomas Lane: There we go. [crosstalk 00:17:47]

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Quentin: Thank you. You going to get blessed for this.

Thomas Lane: Huh?

Quentin: You're going to get blessed for this.

Thomas Lane: Oh. My wife blesses me all the time. [crosstalk 00:18:14] So she says though, right? You never know. These puddles back here. This stuff's melting quick. Oh, boy. Yeah.

Speaker 3: You're almost there.

Thomas Lane: I know. [inaudible 00:19:03] all right.

Quentin: You getting a workout in?

Thomas Lane: Yeah. I was like, "This is what I need."

Quentin: Yeah.

Thomas Lane: A little front workout. Hang out for a little bit.

Quentin: Yeah.

Thomas Lane: Find out that my shoes are not as advertised. Nonslip. You tell me if I'm going to hit anything. I can't really see.

Quentin: [inaudible 00:19:45]

Thomas Lane: This thing's pretty stable.

Quentin: Yeah.

Thomas Lane: How much does it weigh?

Quentin: [inaudible 00:19:52] It's powerful too.

Thomas Lane: You wouldn't have any problem going through this stuff when it was charged?

Quentin: No.

Thomas Lane: That's awesome. [crosstalk 00:20:03] Oh, okay. Here we go. Oh, geez. God. I think I'm just going to go backwards again. I'm too tall. I got a high center of gravity.

Quentin: Yeah. [inaudible 00:20:57]

Thomas Lane: What's that?









