

STATE OF MINNESOTA
COUNTY OF HENNEPIN

DISTRICT COURT
FOURTH JUDICIAL DISTRICT

Court File No. 27-CR-20-12953

State of Minnesota,

Plaintiff,

vs.

**DEFENDANT'S SUPPLEMENTAL
DEMAND FOR DISCOVERY**

J. Alexander Kueng,

Defendant.

**TO: THE HONORABLE PETER A. CAHILL, JUDGE OF HENNEPIN COUNTY
DISTRICT COURT; AND KEITH ELLISON, ATTORNEY GENERAL OF
MINNESOTA; MICHAEL FREEMAN, HENNEPIN COUNTY ATTORNEY.**

The defendant, by and through his attorney, requests the following additional discovery from the state.

- 1) Copies of Minneapolis Police Officer Training materials that have working links to video and audio files and external links that were previously disclosed in power point format. Minn. R. Crim. Pro. 9.01, subd. 1(3).
- 2) Disclose the any and all FBI and other agency interview notes between Beth Stack, Patti Jerkoski and Dr. Baker regarding the July 9, 2020 interview by the F.B.I.
- 3) Disclosure of all documents that the National Prosecutor's College has regarding any expert witness, whether called by the state or the defense.

- 4) All Reports establishing the chain of custody and any investigative reports documenting the December 9, 2020 of Mr. Floyd's vehicle and any reports from searches of the vehicle from before December 9, 2020.
- 5) An Order requiring the State to provide the defense with N.C.I.C. criminal background checks regarding all of the State's prospective witnesses, including law enforcement witnesses. See Minn.R.Crim.P. 9.01 Subd. 1 (1) (a).
- 6) Disclosure of a complete copy of the BCA investigative file in this matter.
- 7) Disclosure of all evidence, reports and scientific/forensic examination information from the methamphetamine and possible fentanyl to include all lab reports and notes from the DNA testing that confirmed that Mr. Floyd's DNA from saliva was found on the drugs in the back of the squad car.

Respectfully submitted,

Date: February 8, 2021

/s/ **Thomas C. Plunkett**

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