

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF HENNEPIN

FOURTH JUDICIAL DISTRICT

State of Minnesota,

Plaintiff,

**STATE'S NOTICE OF MOTION
AND MOTION**

vs.

Court Case No. 27-CR-19-12466

C.A. Case No. 19A06301

Terrell Johnson,

Defendant.

TO: THE HONORABLE JULIE ALLYN, JUDGE OF DISTRICT COURT; AND
DEFENDANT

PLEASE TAKE NOTICE that, on May 17, 2021, at 9:00 a.m., or as soon thereafter as
counsel may be heard, the State will move the Court as follows:

MOTION

The State of Minnesota hereby moves the Court for an Order allowing the State to
impeach the above-named Defendant pursuant to Minnesota Rule of Evidence 609 with the
following felony convictions:

1. Domestic Assault, 27-CR-13-41777, conviction date March 4, 2014.
2. Terroristic Threats, 27-CR-13-6522, conviction date April 12, 2013.
3. 5th Degree Drug, 27-CR-17-1516, conviction date July 19, 2018.
4. 5th Degree Drug, 27-CR-18-27501, conviction date January 4, 2019.

Respectfully submitted,

MICHAEL O. FREEMAN
Hennepin County Attorney

Dated: April 15, 2021

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