

STATE OF MINNESOTA

JUDICIAL COURT

COUNTY OF HENNEPIN

FOURTH JUDICIAL DISTRICT

State of Minnesota  
Plaintiff,  
vs.

Court File No.: 27-CR-23-512

STATE'S REQUEST FOR DISCLOSURE

Abdinour Mohamed Alasow  
Defendant.

Pursuant to Rule 9, Minnesota Rules of Criminal Procedure, the State of Minnesota requests defendant make the following disclosures.

1) Documents and tangible objects, the location of buildings and places concerning which the defendant intends to offer evidence, and also any reports on prospective jurors regardless as to whether the defendant intends to use said reports at trial.

The State of Minnesota requests disclosure of books, papers, documents, photographs and tangible objects which defendant has in his/her possession or under his/her control and intends to introduce into evidence at the trial or concerning which the defendant intends to offer evidence at the trial and requests an opportunity, at a reasonable time and place, to inspect and reproduce the same. The State of Minnesota also requests an opportunity at a reasonable time, to inspect and photograph buildings or places in the defendant's possession or under his/her control concerning which the defendant intends to offer evidence at the trial.

If said books, papers, documents, photographs, tangible objects, buildings or places are not in defendant's possession or under his/her control, the State requests defendant advise the State of their location.

## 2) Reports of Examination and Tests

The State of Minnesota requests an opportunity, at a reasonable time and place, to inspect and reproduce any results or reports of physical or mental examinations, scientific tests, experiments or comparisons made in connection with the above-entitled matter within the possession or control of the defendant which he/she intends to introduce in evidence at the trial or which were prepared by witnesses who the defendant intends to call at the trial when the results or reports relate to his/her testimony.

The State of Minnesota also requests, for all expert witnesses the defendant may call to testify at trial, a written summary of the subject matter of the expert's testimony along with findings, opinions, or conclusions the expert will give, the basis for them and the expert's qualifications.

## 3) Notice of the Defense and Defense Witnesses and Criminal Record

a. The State of Minnesota requests that the defendant inform the State in writing of any defense, other than that of not guilty on which the defendant intends to rely at the trial, including but not limiting to the defense of self-defense, entrapment, mental illness or deficiency, duress, alibi, double jeopardy, statute of limitations, collateral estoppel, defense under Minn. Stat. Sec. 609.035, or intoxication.

The State further requests that the defendant supply the prosecuting attorney with the names and addresses of persons whom the defendant intends to call as witnesses at the trial together with their record of convictions, if any.

b. The State of Minnesota requests an opportunity to inspect and reproduce any relevant written or recorded statements of the persons whom the defendant intends to call as witnesses at the trial and also statements of prosecution witnesses obtained by defense counsel, the defendant or persons participating in the defense and which are within the possession or control of the defendant and the prosecuting attorney requests an opportunity to inspect and reproduce any written summaries within defense knowledge of the substance of any oral statements made by such witnesses to defense counsel or obtained by the defendant at the direction of his counsel. The prosecuting attorney requests that the defendant disclose the substance of any oral statements that relate to the case made by persons the defendant intends to call as witnesses at trial and that were made to defense counsel or persons participating in the defense.

c. Alibi and Entrapment.

The State of Minnesota requests that if the defendant intends to offer evidence of an alibi, that he/she inform the prosecuting attorney of the specific place or places where the defendant contends he/she was when the alleged offense occurred. The State further requests the names and addresses of the witnesses he/she intends to call at the trial in support of the alibi.

The State of Minnesota requests that if the defendant intends to offer evidence of entrapment, that the defendant inform the prosecuting attorney of the facts supporting the defense and elect whether to submit the defense to the court or a jury.

d. Criminal Record

The State of Minnesota requests the defense counsel inform the State of any prior convictions of the defendant.

Respectfully Submitted

Dated: February 16, 2023

s/Christopher P. Renz



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Prosecuting Attorney Metropolitan Airports Commission