

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF WINONA

THIRD JUDICIAL DISTRICT

State of Minnesota,

Plaintiff,

**STATE'S REQUEST FOR
DISCLOSURE BY DEFENDANT**

-vs-

Adam Taylor Fravel,

Defendant.

District Court File No.: 85-CR-23-937

County Attorney File No.: 65187

**PURSUANT TO RULE 9.02, SUBD. 1 OF MINNESOTA RULES OF CRIMINAL
PROCEDURE, STATE OF MINNESOTA, PLAINTIFF, HEREBY REQUESTS:**

- (1) That defendant disclose and permit the prosecuting attorney to inspect and reproduce books, papers, documents, photographs, and tangible objects which the defendant intends to introduce in evidence at the trial or concerning which the defendant intends to offer evidence at the trial.
- (2) That defendant disclose and permit the prosecuting attorney to inspect and photograph buildings or places concerning which the defendant intends to offer evidence at the trial.
- (3) That defendant disclose and permit the prosecuting attorney to inspect and reproduce any results or reports of physical or mental examination, scientific tests, experiments and comparisons made in connection with this particular case within the possession or control of the defendant which defendant intends to introduce in evidence at the trial or which were prepared by a witness whom the defendant intends to call at the trial when the results or reports related to his/her testimony.
- (4) That defendant inform the prosecuting attorney in writing of any defense, other than that of not guilty, on which the defendant intends to rely at the trial, including but not limited to the defense of self-defense, entrapment, mental illness or deficiency, duress, alibi, double jeopardy, statute of limitations, collateral estoppel, defense under Minn. Stat. 609.035, or intoxication.
- (5) That defendant supply the prosecuting attorney with the names and addresses of persons whom the defendant intends to call as witnesses at the trial.
- (6) That, if the defendant give notice that he/she intends to rely on the defense of mental illness or mental deficiency, he/she also notify the prosecuting attorney whether he/she also intends to rely on the defense of not guilty.
- (7) That defendant permit the prosecuting attorney 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 which are within the possession or control of the defendant and permit the prosecuting attorney to inspect and reproduce any written summaries within his/her knowledge of the substance of any oral statements made by such witnesses to defense counsel or obtained by the defendant at direction of his counsel.

(8) That if the defendant intends to offer evidence of an alibi, defendant inform the prosecuting attorney of the specific place or places where the defendant contends he/she was when the alleged offense occurred and addresses of the witnesses he/she intends to call at the trial in support of the alibi.

ALL DISCLOSURES REQUESTED BY THIS NOTICE MUST BE MADE A SUFFICIENT TIME BEFORE THE DATE OF THE OMNIBUS HEARING IN THIS MATTER TO ENABLE THE PROSECUTING ATTORNEY SUFFICIENT TIME TO INSPECT, REPRODUCE, OR PHOTOGRAPH THE DISCLOSED MATERIAL.

PURSUANT TO 9.03 MINNESOTA RULES OF CRIMINAL PROCEDURE, YOU ARE ALSO REQUIRED TO PROVIDE THIS OFFICE WITH ANY ADDITIONAL MATERIAL, INFORMATION OR WITNESSES SUBJECT TO DISCLOSURE THAT YOU DISCOVER SUBSEQUENT TO COMPLIANCE WITH THIS DISCOVERY REQUEST AND YOU FURTHER HAVE A CONTINUING DUTY AT ALL TIMES BEFORE AND DURING TRIAL TO CONTINUE TO SUPPLY THE MATERIAL AND INFORMATION REQUESTED ABOVE.

Dated: June 9, 2023

/s/ Karin L. Sonneman

Karin L. Sonneman
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