

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
Criminal No. 16-334(1) (JNE/KMM)

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	Discovery Declaration and
)	Outline of Pre-Trial Motions
PAUL R. HANSMEIER,)	
)	
Defendant.)	

Paul R. Hansmeier is charged in a 18-count indictment with Conspiracy to Commit Mail Fraud and Wire Fraud (Count 1); Mail Fraud (Counts 2-6); Wire Fraud (Counts 7-16); Conspiracy to Commit Money Laundering (Count 17); and Conspiracy to Commit and Suborn Perjury (Count 18). The above offenses are alleged to have occurred on dates between 2011 and 2014 as set forth in the Indictment (ECF No. 1). Through counsel, Mr. Hansmeier respectfully offers the following declaration concerning the status of discovery in this case and outline of the pre-trial motions that are being filed.¹

DISCOVERY

Counsel received collections of discovery on January 17 and March 2, 2017. The discovery is voluminous and includes written reports and various documents. Although it

¹ This submission is intended as a review of the discovery provided to date and of the discovery and suppression motions filed along with it, and not as a means of avoiding reciprocal discovery obligations under Rule 16 of the Federal Rules of Criminal Procedure. Counsel seek discovery of all materials to which the defense is entitled under any and all laws, rules and regulations, and do not object to the motions for reciprocal discovery that are now routinely offered by the government.

is impossible to know about a process from which we are excluded, the discovery contains no obvious omissions under Rule 16 of the Federal Rules of Criminal Procedure. To error on the safe side, Counsel has filed a discovery motion.

The disclosures provided to date do not contain indications of statements attributed to Mr. Hansmeier in response to interrogation by law enforcement agents. Similarly, no search warrants or reports of searches conducted with or without the authority of search warrants appear in the discovery materials. If it later becomes clear that interrogations or searches and seizures subject to Constitutional or other legal challenge were performed, we will seek leave of the Court to reopen these proceedings so that the underlying issues can be addressed.

MOTIONS

Aside from the discovery motion, Counsel has filed the following motions:

1. Disclosure of 404(b) evidence and Memorandum in Support
2. Disclosure of Brady evidence
3. Disclosure of Expert Testimony
4. Motion for Bill of Particulars
5. Motion to Dismiss Counts of the Indictment and Memorandum in Support.

MEET AND CONFER

On April 24, 2017, counsel conferred with the prosecution, pursuant to and in accordance with L.R. 12. 1, to clarify and narrow issues.

Dated: April 24, 2017

Respectfully submitted,

s/ Andrew H. Mohring

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