

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
Criminal No. 26MJ101 (JNE/DLM)

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	MOTION FOR DISCOVERY
v.	)	AND INSPECTION
	)	
JOSEPH FRANKLIN,	)	
	)	
Defendant.	)	

Joseph Franklin, through his attorney, Siri Carlson McDowell, respectfully moves the Court to order and requests the government to continue to disclose the following information; and the same make available for inspection, copying and photographing:

1. Any and all written or recorded statements made by Mr. Franklin or copies thereof within the possession, custody or control of the government, the existence of which is known, or by the exercise of due diligence may become known to the attorney for the government.

2. That portion of any written record containing the substance of any relevant oral statement made by Mr. Franklin whether before or after arrest in response to interrogation by a known government agent.

3. Substance of any relevant oral statement made by Mr. Franklin whether before or after arrest in response to any interrogation by any person, known to Mr. Franklin to be a government agent if the government intends to use that statement at trial.

4. A copy of the prior criminal record of Mr. Franklin, if any, which is in the possession, custody or control of the government, the existence of which is known or by the exercise of due diligence may become known to the attorney for the government.

5. Any books, papers, documents, photographs, tangible objects, buildings or places, or copies or portions thereof which are within the possession, custody or control of the government and which are material to the preparation of the defense or are intended for use by the government as evidence in chief at the trial, or were obtained from or belonged to Mr. Franklin.

6. Any results or reports of physical or mental examinations, and of scientific tests or experiments, or copies thereof which are within the possession, custody or control of the government, the existence of which is known, or by the exercise of due diligence may become known to the attorney for the government, and which are material to the preparation of the defense or are intended for use by the government as evidence in chief at trial.

7. A pretrial written summary of testimony the government intends to use pursuant to Rules 702, 703, or 705 of the Federal Rules of Evidence during its case in chief at trial. This summary must describe the witnesses' opinions, the bases and the reasons therefore, and the witnesses' qualifications.

If, prior to trial, the government discovers additional evidence or material previously requested or ordered which is subject to discovery or inspection as herein requested, the government is requested to notify the attorneys for Mr. Franklin about the existence of the additional material.

Dated: March 16, 2026

Respectfully submitted,

s/Siri Carlson McDowell

SIRI CARLSON MCDOWELL

Attorney ID No. 0401693

Attorney for Mr. Franklin

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