

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA
Criminal No: 26-mj-53 (MJD/LIB)

UNITED STATES OF AMERICA,

Plaintiff,

v.

MOHAMED ABDIRIZAK JAMA,

Defendant.

MOTION FOR DISCOVERY

Pursuant to Federal Rule of Criminal Procedure 16(a), *Brady*, *Giglio*, and applicable law, the Defendant moves for additional discovery from the United States.

The United States has provided the Defendant with copies of limited discovery and made unspecified other “items to be offered by the government at any hearing and/or trial” available for inspection. However, the Defendant believes that the government has not disclosed multiple other categories of information required to be disclosed under Rule 16(a) and applicable law, all of which are material to the motions hearing and preparing and presenting a defense at trial.

The Defendant seeks an order requiring the United States to disclose the following materials to the extent they relate to any DHS, CBP, ICE, Border Patrol, or any other law enforcement officer or agent that participated in any way in the stop,

pursuit, arrest, transportation, booking, release, re-arrest, interview of, or any other interaction with the Defendant in connection with these charges:

1) Copies of all cell phone video and body camera footage from all such agents and officers related in any way to this case.

2) Criminal histories and personnel files for each of the DHS and Border Patrol agents.

3) DHS or CBP training records for each such DHS and CBP agent.

4) Computer and cell phone browsing and search histories for each DHS and CBP agent from January 20 through the date of the Misdemeanor Information related in any way to the Defendant or this case, including all histories and search queries made on the Internet, on any intranet sites available to the agents, and on any CIS, vehicle registration, driver information, or other State or Federal database, whether or not available to the public.

5) Any and all records of any informational database reviewed, relied on, consulted, or considered by any DHS or CBP officer, or any other law enforcement officer who participated in this matter.

6) Copies of all radio traffic, dispatch records, cell phone communications, and any other communications between or among DHS agents, CBP agents, and any other law enforcement personnel regarding this incident, whether such data is stored on a government or private device or other storage media.

7) All documents, communications, phone records, text messages, chats, emails, transmittals, and any other exchange of information between or among DHS, CBP, the U.S. Attorney's Office for the District of Minnesota, the Department of Justice, and any other law enforcement or prosecutive authorities regarding the potential or actual charging, declination, presentment, dismissal, recharging, or recharacterization of any criminal charges related to the Defendant.

8) Any and all photographs, text messages, emails, chats, or other cell phone data captured by or depicting any of the aforementioned law enforcement officers.

9) Any and all draft affidavits prepared in anticipation of the potential charging of this matter by felony Complaint.

10) All law enforcement training records or curricula for any of the aforementioned law enforcement officers.

11) All disciplinary files, Internal Affairs files, adverse findings regarding credibility or fitness, any other adverse performance assessments for any of the aforementioned agents or officers.

12) Any reports by the police, DHS, ICE, Border Patrol, or any other law enforcement agencies regarding the events disclosed in the discovery or the operational goals of the agents and officers that participated in such events.

13) Any and all audio, photos, video (including any body-worn, dash-camera, surveillance footage, or recordings on the officers' personal devices), text messages,

emails, booking and arrest records, evidence and chain-of-custody logs, and any documented verbal conversations related to this matter.

Dated: March 6, 2026

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s/ Surya Saxena

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