

STATE OF MINNESOTA
COUNTY OF DAKOTA

DISTRICT COURT
FIRST JUDICIAL DISTRICT
Court File No. K6-04-736

State of Minnesota,

Plaintiff,

vs.

STATE'S DISCLOSURE
OF TRIAL WITNESSES

Phillip Randall Vance,

Defendant.

TO: THE ABOVE-NAMED DEFENDANT AND HIS ATTORNEY, NITU SINGH,
ASSISTANT PUBLIC DEFENDER, 7300 WEST 147TH STREET, SUITE 400,
APPLE VALLEY, MN 55124.

I hereby inform you, pursuant to Rule 9.01, Subd. 1(1), Minnesota Rules of
Criminal Procedure, that the State intends to call the following witnesses at trial in the
above-entitled matter:

1. Tariq Bakkri *-nitu*
[REDACTED]
Blaine, MN 55434
Phone: 651-226-8877
Record of Convictions: None
Inducements: None

2. Kathleen Johnson *→ Eyewitness - nitu*
[REDACTED]
South St. Paul, MN 55075
Phone: 651-455-2696
Record of Convictions: None
Inducements: None

3. Matthew Renville *→ teenager - nitu*
[REDACTED]
South St. Paul, MN 55075
Phone: 651-457-2541
Record of Convictions: None
Inducements: None

4. Samantha Renville - *niku*
 [Redacted]
 South St. Paul, MN 55075
 Phone: 651-457-2541
 Record of Convictions: None
 Inducements: None

5. Dale Marx, Jr. - *niku*
 [Redacted]
 South St. Paul, MN 55075
 Phone: 651-451-6783
 Record of Convictions: None
 Inducements: None

6. Dale Marx → *learn*
 [Redacted]
 South St. Paul, MN 55075
 Phone: 651-451-6783
 Record of Convictions:
 (1) 11/13/79: Unauthorized Use of a Motor Vehicle, Dakota County
 (2) 09/27/90: DWI, Dakota County
 (3) 03/27/97: DWI, Ramsey County
 Inducements: None

all to
 7. Melissa Stites, *learn* *boyfriend in prison in PA?*
 19121/2 Tittston Ave.
 Scranton, PA 18505
 Phone: Unknown at this time
 Record of Convictions:
 (1) 04/17/98: DWI, Ramsey County
 (2) 11/20/96: Check Forgery, Hennepin County
 Inducements: Please note, the following inducements were not promised in exchange for the testimony of the witness.
 (1) Witness was advised that she may be eligible for reward money from the victim's family.
 (2) Witness received funds from the Minnesota Gang Strike Force for relocation expenses. Amount unknown.
 (3) Witness received \$550.00 from the South St. Paul Police Department as informant pay and for relocation expenses.

learn
 8. Colleen McManus
 Current address unknown.
 Ms. McManus has retained Peter Orput for contact purposes.
 Peter Orput
 Attorney at Law
 4660 Slater Rd.

fall to need meeting

11. *Clear*
 Maynard Cross
 Minnesota Correctional Facility – Oak Park Heights
 5329 Osgood Ave. N.
 Stillwater, MN 55082
 Phone: 651-779-1400
 Record of Convictions:

- (1) 01/09/98: Assault in the Second Degree, Ramsey County
- (2) 03/12/02: Possession of Firearm by Felon, Hennepin County
- (3) 09/09/03: Murder in the First Degree, Hennepin County

Inducements: In exchange for the cooperation of this witness, the state agreed to request from the Minnesota Department of Corrections that the witness be transferred from the medium security facility of Rush City to the maximum-security facility of Oak Park Heights. This witness was also advised by the South St. Paul Police Department that the witness may be eligible for reward money from the victim's family.

talk to her

12. Yvonne White
 [REDACTED]
 Hastings, MN 55033
 Phone: 651-480-1114
 Record of Convictions: None
 Inducements: None

*nih
 Dantay Pubat
 Silene
 [scribble]*

talk to her

13. Amy Drager
 [REDACTED]
 Eagan, MN 55122
 Phone: 651-686-4676
 Record of Convictions: None
 Inducements: None

*nih
 house afterwards.*

14. Regina Haggerman
 [REDACTED]
 St. Paul, MN 55104
 Phone: 651-493-9126
 Record of Convictions: None
 Inducements: None

*nih
 Danelle awhie
 Vaneel told her you did it.
 Dantay locked up at Ramsey*

15. Vanessa Franco
 [REDACTED]
 St. Paul, MN 55102
 Phone: Unknown
 Record of Convictions: None
 Inducements: None

*Van's
 Stacks chicky*

- 16. Christopher Koskie *clear*
 [REDACTED] *→ Bartender at Butter.*
 St. Paul, MN 55102
 Phone: 651-330-1109
 Record of Convictions: None
 Inducements: None
- 17. Rochelle Perez *clear*
 [REDACTED] *shakes others air!*
 St. Paul, MN
 Phone: 651-340-5824
 Record of Convictions: None
 Inducements: None
- 18. Sonya Clark *niku*
 [REDACTED] *Vancee child's momma*
 Maple Grove, MN
 Phone: 763-416-0860
 Record of Convictions: None
 Inducements: None
- 19. John Martin *niku*
 [REDACTED] *→ Sous Che's at the Radisson*
 St. Paul, MN 55106
 Phone: Unknown
 Record of Convictions:
 (1) 10/16/03: Burglary in the Third Degree, Ramsey County
 Inducements: Please note, the following inducements were not promised in exchange for the testimony of the witness.
 (1) The South St. Paul Police Department paid the sum of \$169.50 to this witness as an informant.
- 20. Fabian Wilson *clear*
 [REDACTED] *DS \$*
 [REDACTED] *Vancee's sister's boyfriend*
 St. Paul, MN 55102
 Phone: 651-265-3476
 Record of Convictions:
 (1) 09/19/03: Burglary in the Third Degree, Ramsey County
 Record of Juvenile Adjudications:
 (1) 12/07/98: Simple Robbery
 Inducements: None

- 21. Nicole Rauschnot *with*
 [REDACTED] *-> driver*
 West St. Paul, MN 55118 *owner of blue Cadillac*
 Phone: Unknown
 Record of Convictions: None
 Inducements: None
- 22. Kentrell Anthony *with Regina's niece*
 956 Minnehaha Ave. E.
 St. Paul, MN 55106
 Phone: 651-772-8334
 Record of Convictions:
 (1) 07/02/04: Misdemeanor Theft, Ramsey County
 Record of Juvenile Adjudications:
 (1) 10/04/00: Aggravated Robbery in the First Degree, Ramsey County
 Inducements: None
- 23. Eric Griffin *clear J. Lewis name.*
 [REDACTED]
 St. Paul, MN 55104
 Phone: 651-207-5719
 Record of Convictions:
 (1) 10/02/97: Nonsupport, Missouri
 (2) 03/02/00: Controlled Substance Crime in the Fifth Degree, Ramsey County
 Inducements: This witness has a pending charge of controlled substance crime in the third degree in Ramsey County. The arresting agency was the Minnesota Gang Strike Force. This witness reached an agreement with the Strike Force that in exchange for his cooperation, the Strike Force will ask the Ramsey County Attorney's Office to dismiss the pending drug charge.
- 24. Tyrone Crawford *clear*
 Sherburne County Jail
 Record of Convictions:
 (1) 08/14/91: Controlled Substance Crime in the Third Degree, Ramsey County
 (2) 12/12/91: Controlled Substance Crime in the Fifth Degree, Ramsey County
 (3) 10/06/98: Check Forgery, Ramsey County
 (4) 02/19/04: Mail Fraud, Federal Court, District of Minnesota
 Inducements: None

25. Dontay Reese *with*

Goodhue County Jail

Record of Convictions:

- (1) 05/15/99: Misdemeanor Obstructing Legal Process, Hennepin County
- (2) 10/14/99: Gross Misdemeanor Theft, Ramsey County
- (3) 10/25/99: Misdemeanor Receiving Stolen Property, Hennepin County
- (4) 11/11/99: Misdemeanor Assault in the Fifth Degree, Ramsey County
- (5) 12/21/99: Misdemeanor Trespassing, Hennepin County
- (6) 03/02/00: Misdemeanor Assault in the Fifth Degree, Ramsey County
- (7) 05/04/00: Misdemeanor Trespass, Hennepin County
- (8) 06/01/00: Misdemeanor Theft, Ramsey County
- (9) 06/17/00: Burglary in the First Degree
- (10) 06/26/00: Controlled Substance Crime in the Fifth Degree, Ramsey County
- (11) 12/02/01: Theft of Motor Vehicle, Ramsey County
- (12) 09/16/02: Minor in Possession, Scott County *not this*

Record of Juvenile Adjudications:

- (1) 03/24/95: Misdemeanor Assault in the Fifth Degree, Dakota County
- (2) 08/16/95: Misdemeanor Motor Vehicle Tampering, Dakota County
- (3) 11/09/95: Misdemeanor Possession of a Small Amount of Marijuana, Dakota County
- (4) 11/09/95: Misdemeanor Theft, Dakota County
- (5) 05/12/98: Disorderly Conduct, Dakota County
- (6) 07/11/98: Misdemeanor Crime Against the Administration of Justice, Dakota County
- (7) 05/19/98: Misdemeanor Assault in the Fifth Degree, Dakota County

Inducements: The defendant is awaiting sentencing in Dakota County on a charge of Criminal Sexual Conduct in the Second Degree. In exchange for his cooperation, the state has agreed to a downward durational departure from 98 months to 62 months.

26. Katharine Bakkri *with*

[Redacted]

Blaine, MN 55434

Phone: 651-226-8877

Record of Convictions: None

Inducements: None

27. Troy Crawford *Clear*
 Minnesota Correctional Facility-St. Cloud
 2305 Minnesota Blvd. SE
 St. Cloud, MN 56304
 Phone: 320-240-3000
 Record of Convictions:
 (1) 02/21/01: Assault in the Second Degree, Ramsey County
 (2) 09/16/03: Unlawful Possession of a Pistol by a Felon, Ramsey County
 Inducements: None

28. Trevor Crawford *Clear*
 Minnesota Correctional Facility-St. Cloud
 2305 Minnesota Blvd. SE
 St. Cloud, MN 56304
 Phone: 320-240-3000
 Record of Convictions:
 (1) 08/10/01: DL/False Info, Ramsey County
 (2) 02/19/03: DL/ Unlawful Acts, Ramsey County
 (3) 03/14/03: DL/Unlawful Acts, Ramsey County
 (4) 04/28/03: Controlled Substance Crime in the Fifth Degree, Hennepin County
 (5) 06/30/04: Unlawful Possession of a Pistol by a Felon, Ramsey County
 Record of Juvenile Adjudications:
 (1) 09/08/98: Assault in the Fifth Degree, Ramsey County
 (2) 06/14/00: Controlled Substance Crime in the Fourth Degree
 Inducements: None

29. Dominique Blatcher *Clear* → *gets calls all night long*
 Address Unknown
 Phone: Unknown
 Record of Convictions: None
 Inducements: None

30. Lugene O'Connor *with* *Kentrall Grandfather*
 956 Minnehaha Ave. E.
 St. Paul, MN 55106
 Phone: 651-772-8334
 Record of Convictions: None
 Inducements: None
Stucks showed up drinking \$

- 31. Jacqueline Ezell *- nika*
956 Minnehaha Ave. E. *wife of Eugene.*
St. Paul, MN 55106
Phone: 651-772-8334
Record of Convictions: None
Inducements: None
- 32. Keitha McKinney *- Clean*
[REDACTED] *Hennessey's women*
St. Paul, MN *Robinson*
Unknown *Call all rights after phone*
Record of Convictions: *from Shucks + Thomee.*
(1) 01/21/03: Wrongfully Obtaining Public Assistance, Ramsey
County
Inducements: None
- 33. Richard Robinson *- Clean*
Ramsey County Jail
Record of Convictions:
(1) 02/19/02: DL/Unlawful Acts, Ramsey County
(2) 03/13/02: Receiving Stolen Property, Ramsey County
Inducements: None
- 34. South St. Paul Police Dept.
Dave Greengo
Richard Roehlen
Michael Smith
Mark Sawyer
Tom Kreager
Daniel Vujovich
Phillip Oeffling
Steve Ploeckelmann *nika*
- 35. Dakota County Sheriff's Dept.
David Sjogren
Brad Wayne *Clean*
- 36. Minnesota Gang Strike Force
John McManus
John Pyka
Andy Shoemaker *Clean*

Minnesota Gang Strike Force
1919 University Ave. #550
St. Paul, MN 55104

37. Minnesota Bureau of Criminal Apprehension

Kurt Moline
Dr. Mohamed Sedqi
Dr. Jay Wenner
Donald Melander
Joshua Bergeron
Sarah Leach
Susan Gross

with

MN BCA
1430 Maryland Ave. E.
St. Paul, MN 55106

38. Special Agent Dave Nygren
Dept. of the Treasury
Bureau of Alcohol, Tobacco and Firearms
190 E. 5th St. #310
St. Paul, MN 55101

with

Since the state does not have access to your file, it will only rely on written notices from you as to what witnesses you intend to call, what defenses you intend to raise, and what evidence you intend to introduce. If the state does not receive written notice, it will conclude that your only defense will be not guilty and your only witness will be the defendant.

DATED: August 13, 2004

JAMES C. BACKSTROM
DAKOTA COUNTY ATTORNEY

By:

Kathryn M. Keena
Kathryn M. Keena
Assistant County Attorney
Reg. No. 20092x
Dakota County Attorney's Office
1560 Highway 55
Hastings, MN 55033
Telephone: (651) 438-4438

STATE OF MINNESOTA
COUNTY OF DAKOTA

DISTRICT COURT
FIRST JUDICIAL DISTRICT
Court File No. K6-04-736

State of Minnesota,

Plaintiff,

vs.

STATE'S DISCLOSURE
OF TRIAL WITNESSES

Phillip Randall Vance,

Defendant.

**TO: THE ABOVE-NAMED DEFENDANT AND HIS ATTORNEY, NITU SINGH,
ASSISTANT PUBLIC DEFENDER, 7300 WEST 147TH STREET, SUITE 400,
APPLE VALLEY, MN 55124.**

I hereby inform you, pursuant to Rule 9.01, Subd. 1(1), Minnesota Rules of Criminal Procedure, that the State intends to call the following witnesses at trial in the above-entitled matter:

1. Tariq Bakkri → *nitu*
[Redacted]
Blaine, MN 55434
Phone: 651-226-8877
Record of Convictions: None
Inducements: None

2. Kathleen Johnson → *nitu*
[Redacted]
South St. Paul, MN 55075
Phone: 651-455-2696
Record of Convictions: None
Inducements: None

3. Matthew Renville - *nitu*
[Redacted]
South St. Paul, MN 55075
Phone: 651-457-2541
Record of Convictions: None
Inducements: None

4. Samantha Renville - *nihu*
[REDACTED]

South St. Paul, MN 55075
Phone: 651-457-2541
Record of Convictions: None
Inducements: None

5. Dale Marx, Jr. - *nihu*
[REDACTED]

South St. Paul, MN 55075
Phone: 651-451-6783
Record of Convictions: None
Inducements: None

6. Dale Marx - *Clear*
[REDACTED]

South St. Paul, MN 55075
Phone: 651-451-6783
Record of Convictions:
(1) 11/13/79: Unauthorized Use of a Motor Vehicle, Dakota County
(2) 09/27/90: DWI, Dakota County
(3) 03/27/97: DWI, Ramsey County
Inducements: None

→ 7. Melissa Stites - *Clear*

19121/2 Tittston Ave.
Scranton, PA 18505
Phone: Unknown at this time
Record of Convictions:

(1) 04/17/98: DWI, Ramsey County
* (2) 11/20/96: Check Forgery, Hennepin County
Inducements: Please note, the following inducements were not promised in exchange for the testimony of the witness.
(1) Witness was advised that she may be eligible for reward money from the victim's family.
(2) Witness received funds from the Minnesota Gang Strike Force for relocation expenses. Amount unknown.
(3) Witness received \$550.00 from the South St. Paul Police Department as informant pay and for relocation expenses.

→ 8. Colleen McManus - *Clear*

Current address unknown.
Ms. McManus has retained Peter Orput for contact purposes.
Peter Orput
Attorney at Law
4660 Slater Rd.

Suite 230
Eagan, MN 55122
651-209-0567

Record of Convictions: None

Inducements: Please note, the following inducements were not promised in exchange for the testimony of the witness.

- (1) The South St. Paul Police Department paid the sum of \$330.00 to this witness as an informant.

9. Lindsey Thomas, M.D. — *niter*
 Minnesota Regional Coroner's Office
 Regina Medical Center
 1175 Nininger Road
 Hastings, MN 55033
 Phone: 651-480-4253
 Criminal Convictions: None
 Inducements: None

→ 10. Geronimo Estrada — *niter*

West St. Paul, MN 55118

Phone: Unknown

Record of Convictions:

- (1) 09/08/87: Burglary, Dakota County
- (2) 10/20/92: Possession of Pistol by Ineligible Person, Ramsey County
- (3) 10/09/02: Controlled Substance Crime in the Fifth Degree, Ramsey County
- (4) 04/15/03: Controlled Substance Crime in the Second Degree, Dakota County
- (5) 03/08/04: Unauthorized Use of a Motor Vehicle, Wisconsin

Inducements: Please note, the following inducements were not promised in exchange for the testimony of the witness.

- (1) The South St. Paul Police Department paid the wife of this witness \$400.00 to defray phone costs between she and the witness while he was incarcerated at the Ramsey County Workhouse. \$200.00 was paid on March 11, 2004; \$100.00 was paid on March 19, 2004; and \$100.00 was paid on June 17, 2004.
- (2) The witness is currently on probation in Dakota County for Controlled Substance Crime in the Second Degree. On November 25, 2003, the witness admitted to a probation violation and was required to perform 25 days of EHM. The witness was subsequently incarcerated at the Ramsey County Workhouse. On May 4, 2004, Judge Sutherland entered an amended order on the Dakota County probation violation. Rather than serving 25 days of EHM, the witness was required to serve 30 days in jail, concurrent with the time he served in Ramsey County.

- 11. Maynard Cross — *Clear*
 Minnesota Correctional Facility — Oak Park Heights
 5329 Osgood Ave. N.
 Stillwater, MN 55082
 Phone: 651-779-1400
 Record of Convictions:
 (1) 01/09/98: Assault in the Second Degree, Ramsey County
 (2) 03/12/02: Possession of Firearm by Felon, Hennepin County
 (3) 09/09/03: Murder in the First Degree, Hennepin County
 Inducements: In exchange for the cooperation of this witness, the state agreed to request from the Minnesota Department of Corrections that the witness be transferred from the medium security facility of Rush City to the maximum-security facility of Oak Park Heights. This witness was also advised by the South St. Paul Police Department that the witness may be eligible for reward money from the victim's family.

- 12. Yvonne White — *Nita*
 [Redacted]
 Hastings, MN 55033 *Dontaye claims she's one of the white girls driving car*
 Phone: 651-480-1114 *Dontaye puts her @ Stone.*
 Record of Convictions: None
 Inducements: None

- 13. Amy Drager — *Nita*
 [Redacted] *→ supposedly was going to be used as alibi for Johnson's name.*
 Eagan, MN 55122
 Phone: 651-686-4676
 Record of Convictions: None
 Inducements: None

- 14. Regina Haggerman — *Nita*
 [Redacted] *Vance is a friend of her niece - sat B4 Super Bowl*
 St. Paul, MN 55104
 Phone: 651-493-9126
 Record of Convictions: None
 Inducements: None

- 15. Vanessa Franco — *Clear*
 [Redacted] *Says she doesn't know sh't.*
 St. Paul, MN 55102
 Phone: Unknown
 Record of Convictions: None
 Inducements: None

- 16. Christopher Koskie *Clear*
 [Redacted] *another bartender & butler who was there*
 St. Paul, MN 55102
 Phone: 651-330-1109
 Record of Convictions: None
 Inducements: None
- 17. Rochelle Perez *Clear*
 [Redacted] *was w/ Vance, Johnson, & Franco*
 St. Paul, MN *Lord & G did it*
 Phone: 651-340-5824
 Record of Convictions: None
 Inducements: None
- 18. Sonya Clark *niku*
 [Redacted] *Bought cell phone for Vance Baby mommy.*
 Maple Grove, MN
 Phone: 763-416-0860
 Record of Convictions: None
 Inducements: None
- 19. John Martin *niku*
 [Redacted] *Knew Nicole picked up Vance & Johnson and she has a blue car. Testifies @ grand jury.*
 St. Paul, MN 55106
 Phone: Unknown
 Record of Convictions:
 (1) 10/16/03: Burglary in the Third Degree, Ramsey County
 Inducements: Please note, the following inducements were not promised in exchange for the testimony of the witness.
 (1) The South St. Paul Police Department paid the sum of \$169.50 to this witness as an informant.
- 20. Fabian Wilson *Clear*
 [Redacted] *Has a child w/ Vance's sister*
 St. Paul, MN 55102 *Says Vance admitted it and*
 Phone: 651-265-3476 *said Vance said it to the head.*
 Record of Convictions:
 (1) 09/19/03: Burglary in the Third Degree, Ramsey County
 Record of Juvenile Adjudications:
 (1) 12/07/98: Simple Robbery
 Inducements: None

21. Nicole Rauschnot *Nita*
 [REDACTED] *owner of Blue vehicle*
 West St. Paul, MN 55118 *haird EARL GRAY*
 Phone: Unknown *white girl*
 Record of Convictions: None
 Inducements: None

22. Kentrell Anthony *Nita*
 956 Minnehaha Ave. E. *met Vance & Johnson through Nicole.*
 St. Paul, MN 55106
 Phone: 651-772-8334
 Record of Convictions:
 (1) 07/02/04: Misdemeanor Theft, Ramsey County
 Record of Juvenile Adjudications:
 (1) 10/04/00: Aggravated Robbery in the First Degree, Ramsey County
 Inducements: None

→ 23. Eric Griffin *clear*
 [REDACTED] *Battery that night says Vance says Robbery went wrong had to cap dude. → saw car a Blue car.*
 St. Paul, MN 55104
 Phone: 651-207-5719
 Record of Convictions:
 (1) 10/02/97: Nonsupport, Missouri
 (2) 03/02/00: Controlled Substance Crime in the Fifth Degree, Ramsey County

→ Inducements: This witness has a pending charge of controlled substance crime in the third degree in Ramsey County. The arresting agency was the Minnesota Gang Strike Force. This witness reached an agreement with the Strike Force that in exchange for his cooperation, the Strike Force will ask the Ramsey County Attorney's Office to dismiss the pending drug charge.

→ 24. Tyrone Crawford *clear*
 Sherburne County Jail *claims while in Fed Cust. Vance tells car he did.*
 Record of Convictions:
 (1) 08/14/91: Controlled Substance Crime in the Third Degree, Ramsey County
 (2) 12/12/91: Controlled Substance Crime in the Fifth Degree, Ramsey County
 (3) 10/06/98: Check Forgery, Ramsey County
 (4) 02/19/04: Mail Fraud, Federal Court, District of Minnesota
 Inducements: None

Suite 230
Eagan, MN 55122
651-209-0567

Record of Convictions: None

Inducements: Please note, the following inducements were not promised in exchange for the testimony of the witness.

- (1) The South St. Paul Police Department paid the sum of \$330.00 to this witness as an informant.

9. Lindsey Thomas, M.D. *nku*
 Minnesota Regional Coroner's Office
 Regina Medical Center
 1175 Nininger Road
 Hastings, MN 55033
 Phone: 651-480-4253
 Criminal Convictions: None
 Inducements: None

Added to WMM #10.

Geronimo Estrada *nku*

West St. Paul, MN 55118
Phone: Unknown
Record of Convictions:

- (1) 09/08/87: Burglary, Dakota County
- (2) 10/20/92: Possession of Pistol by Ineligible Person, Ramsey County
- (3) 10/09/02: Controlled Substance Crime in the Fifth Degree, Ramsey County
- (4) 04/15/03: Controlled Substance Crime in the Second Degree, Dakota County
- (5) 03/08/04: Unauthorized Use of a Motor Vehicle, Wisconsin

Inducements: Please note, the following inducements were not promised in exchange for the testimony of the witness.

- (1) The South St. Paul Police Department paid the wife of this witness \$400.00 to defray phone costs between she and the witness while he was incarcerated at the Ramsey County Workhouse. \$200.00 was paid on March 11, 2004; \$100.00 was paid on March 19, 2004; and \$100.00 was paid on June 17, 2004.
- (2) The witness is currently on probation in Dakota County for Controlled Substance Crime in the Second Degree. On November 25, 2003, the witness admitted to a probation violation and was required to perform 25 days of EHM. The witness was subsequently incarcerated at the Ramsey County Workhouse. On May 4, 2004, Judge Sutherland entered an amended order on the Dakota County probation violation. Rather than serving 25 days of EHM, the witness was required to serve 30 days in jail, concurrent with the time he served in Ramsey County.

25. Dontay Reese *nity* *did Represent Him.*
Goodhue County Jail

Record of Convictions:

- (1) 05/15/99: Misdemeanor Obstructing Legal Process, Hennepin County
- (2) 10/14/99: Gross Misdemeanor Theft, Ramsey County
- (3) 10/25/99: Misdemeanor Receiving Stolen Property, Hennepin County
- (4) 11/11/99: Misdemeanor Assault in the Fifth Degree, Ramsey County
- (5) 12/21/99: Misdemeanor Trespassing, Hennepin County
- (6) 03/02/00: Misdemeanor Assault in the Fifth Degree, Ramsey County
- (7) 05/04/00: Misdemeanor Trespass, Hennepin County
- (8) 06/01/00: Misdemeanor Theft, Ramsey County
- (9) 06/17/00: Burglary in the First Degree
- (10) 06/26/00: Controlled Substance Crime in the Fifth Degree, Ramsey County
- (11) 12/02/01: Theft of Motor Vehicle, Ramsey County
- (12) 09/16/02: Minor in Possession, Scott County

Record of Juvenile Adjudications:

- (1) 03/24/95: Misdemeanor Assault in the Fifth Degree, Dakota County
- (2) 08/16/95: Misdemeanor Motor Vehicle Tampering, Dakota County
- (3) 11/09/95: Misdemeanor Possession of a Small Amount of Marijuana, Dakota County
- (4) 11/09/95: Misdemeanor Theft, Dakota County
- (5) 05/12/98: Disorderly Conduct, Dakota County
- (6) 07/11/98: Misdemeanor Crime Against the Administration of Justice, Dakota County
- (7) 05/19/98: Misdemeanor Assault in the Fifth Degree, Dakota County

Inducements: The defendant is awaiting sentencing in Dakota County on a charge of Criminal Sexual Conduct in the Second Degree. In exchange for his cooperation, the state has agreed to a downward durational departure from 98 months to 62 months.

26. Katharine Bakkri *nity*
[Redacted]

Blaine, MN 55434
Phone: 651-226-8877
Record of Convictions: None
Inducements: None

→ 27. Troy Crawford *-lean*
 Minnesota Correctional Facility-St. Cloud *Dontaye and Cross say Crawford*
 2305 Minnesota Blvd. SE *was involved.*
 St. Cloud, MN 56304 *He denies everything.*
 Phone: 320-240-3000

Record of Convictions:
 (1) 02/21/01: Assault in the Second Degree, Ramsey County
 (2) 09/16/03: Unlawful Possession of a Pistol by a Felon, Ramsey County

Inducements: None

28. Trevor Crawford *-nita*
 Minnesota Correctional Facility-St. Cloud *Cross puts Trevor @ Battery*
 2305 Minnesota Blvd. SE *The night of the shooting.*
 St. Cloud, MN 56304 *But → Trevor was in jail*
 Phone: 320-240-3000

Record of Convictions:
 (1) 08/10/01: DL/False Info, Ramsey County
 (2) 02/19/03: DL/ Unlawful Acts, Ramsey County
 (3) 03/14/03: DL/Unlawful Acts, Ramsey County
 (4) 04/28/03: Controlled Substance Crime in the Fifth Degree, Hennepin County
 (5) 06/30/04: Unlawful Possession of a Pistol by a Felon, Ramsey County

Record of Juvenile Adjudications:
 (1) 09/08/98: Assault in the Fifth Degree, Ramsey County
 (2) 06/14/00: Controlled Substance Crime in the Fourth Degree
 Inducements: None

29. Dominique Blatcher *-lean*
 Address Unknown *Johnson's Baby Moma.*
 Phone: Unknown *Cop thinks she helped.*
 Record of Convictions: None
 Inducements: None

30. Lugene O'Connor *-nita*
 956 Minnehaha Ave. E. *granddaughter his Kentrell*
 St. Paul, MN 55106 *Johnson did shooting.*
 Phone: 651-772-8334
 Record of Convictions: None
 Inducements: None

37. Minnesota Bureau of Criminal Apprehension

nitu (

- Kurt Moline - *nitu*
- Dr. Mohamed Sedqi - *nitu*
- Dr. Jay Wenner
- Donald Melander
- Joshua Bergeron
- Sarah Leach
- Susan Gross

MN BCA
 1430 Maryland Ave. E.
 St. Paul, MN 55106

38. Special Agent Dave Nygren - *Clear*
 Dept. of the Treasury
 Bureau of Alcohol, Tobacco and Firearms
 190 E. 5th St. #310
 St. Paul, MN 55101

Since the state does not have access to your file, it will only rely on written notices from you as to what witnesses you intend to call, what defenses you intend to raise, and what evidence you intend to introduce. If the state does not receive written notice, it will conclude that your only defense will be not guilty and your only witness will be the defendant.

DATED: August 13, 2004

JAMES C. BACKSTROM
 DAKOTA COUNTY ATTORNEY

By:

Kathryn M. Keena
 Kathryn M. Keena
 Assistant County Attorney
 Reg. No. 20092x
 Dakota County Attorney's Office
 1560 Highway 55
 Hastings, MN 55033
 Telephone: (651) 438-4438

- 31. Jacqueline Ezell *nita*
956 Minnehaha Ave. E. *Lugene's Wife.*
St. Paul, MN 55106
Phone: 651-772-8334
Record of Convictions: None
Inducements: None
- 32. Keitha McKinney *nita Clear*
Richard Robinsons girlfriend.
[REDACTED] *Robinsons girlfriend in M.Bi*
St. Paul, MN
Unknown
Record of Convictions:
(1) 01/21/03: Wrongfully Obtaining Public Assistance, Ramsey County
Inducements: None *nita Clear*
- 33. Richard Robinson *HENNESSY*
Ramsey County Jail *don't know s.t.*
Record of Convictions:
(1) 02/19/02: DL/Unlawful Acts, Ramsey County
(2) 03/13/02: Receiving Stolen Property, Ramsey County
Inducements: None
- 34. South St. Paul Police Dept.
nita
Dave Greengo
Richard Roehlen
Michael Smith
Mark Sawyer
Tom Kreager
Daniel Vujovich
Phillip Oeffling
Steve Ploeckelmann
- 35. Dakota County Sheriff's Dept.
Clear
David Sjogren
Brad Wayne
- 36. Minnesota Gang Strike Force
Clear
John McManus
John Pyka
Andy Shoemaker

Minnesota Gang Strike Force
1919 University Ave. #550
St. Paul, MN 55104