

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA,

NO.: 26-mj-80 (KMM/EMB)

Plaintiff,

v.

**MOTION TO DISCLOSE
PURSUANT TO RULE
6(e)**

JOSHUA DOYLE,

Defendant.

Joshua Doyle, by and through his attorney, moves this Court, for disclosure of any grand jury proceedings in this case pursuant to Fed. R. Crim. P. 6(e). Specifically, Mr. Doyle moves for disclosure of: (1) any “No Bill” returned by the grand jury related to his and (2) any testimony or evidence presented to the grand jury that resulted in a “No Bill.”

The charge in this matter was initiated by a felony criminal complaint filed on January 26, 2026. (ECF No. 1). The criminal complaint charged Mr. Doyle with violation of 18 U.S.C. § 111(a). A subsequent misdemeanor information was filed on February 3, 2026. (ECF No. 12). The information charges Mr. Doyle with violation of 18 U.S.C. § 111(a)(1).

Rule 6(e)(2)(E)(ii) of the Federal Rules of Criminal Procedure allow this Court to order disclosure of grand jury proceedings, “at the request of a defendant who shows that a ground may exist to dismiss the indictment because of a matter that occurred before the grand jury”. In this case, Mr. Doyle finds himself in the unusual place were the Government filed a criminal complaint alleging he committed a felony charge. 18 U.S.C.

§ 111(a). Then 8 days later the Government filed an information signed only by a Special Assistant United States Attorney alleging Mr. Doyle committed misdemeanor simple assault. 18 U.S.C. § 111(a)(1). Perhaps the case was never brought before the grand jury, in that case the Government’s confirmation that Mr. Doyle’s case was not submitted to the grand jury moots this motion—a process that does not implicate any of the grand jury secrecy rules. However, if Mr. Doyle’s case was submitted to the grand jury, the lack of a returned indictment would form grounds for a motion to dismiss. A “No Bill” would certainly form basis to challenge the information which has been signed only by a Government attorney with no judicial oversight.

Dated: March 12, 2026.

Respectfully submitted,

s / Aaron J. Morrison
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