

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
Court File No. 26-mj-81 (KMM-SGE)

UNITED STATES OF AMERICA,

Plaintiff,

v.

PAUL ERVIN JOHNSON,

Defendant.

**GOVERNMENT’S RESPONSE TO MR.
JOHNSON’S MOTION FOR
DISCLOSURE UNDER RULE 6**

The United States of America, by and through its attorneys, Daniel N. Rosen, United States Attorney for the District of Minnesota, and Michael Hakes-Rodriguez, Special Assistant United States Attorney, hereby submits its response to Johnson’s motions for Disclosure under Fed. R. Crim P. 6(e).

On February 15, 2026, Johnson moved to compel discovery related to: (1) any “No Bill” returned by the grand jury related to Defendant or the conduct alleged in the Complaint; (2) any testimony or evidence presented to the grand jury that resulted in a “No Bill.”¹ Johnson seeks this information for three reasons: (1) it constitutes exculpatory information under *Brady v. Maryland*; (2) disclosure would expose the “falsehoods” posted by the Attorney General on X; (3) the return of a no bill is a matter of public interest.

For reasons that will be provided to the Court ex parte due to Grand Jury secrecy rules, this motion should be denied. To the extent that any Grand Jury information is

¹ Consistent with Rule 6(e), the United States does not acknowledge the existence or non-existence of any such information.

exculpatory as defined by Brady v. Maryland and its progeny or constitutes Jenks pursuant to 18 U.S.C. §3500, the United States agrees to disclose it.

Dated: March 3, 2026

Respectfully Submitted,

DANIEL N. ROSEN
United States Attorney

s/ Michael Hakes-Rodriguez
BY: Michael Hakes-Rodriguez
Special Assistant U.S. Attorney