

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

Criminal No. 22-cr-223 (NEB/DTS)

United States of America,

Plaintiff,

vs.

Abdirahman Mohamud Ahmed,

Defendant.

Motion to Compel Disclosure

Abdirahman Ahmed, through counsel, makes this motion to compel the government to promptly produce disclosure of the following:

1. The exhibits itemized below. Mr. Ahmed's counsel has been unable to locate these exhibits in the discovery so far produced. On December 8, 2025, counsel Dane DeKrey emailed a request for these exhibits to AUSA Melinda Williams, explaining that when counsel contacted the John Ellis firm about these exhibits, they recommended contacting the government to request them. On December 22nd, counsel Bruce Ringstrom followed up by emailing ASUA Harry Jacobs. No exhibits or response have been received.

- B-5 through B-7
- T-13
- T-15

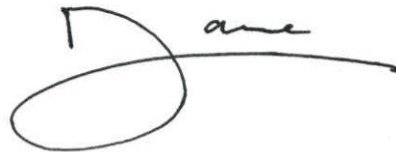
- T-34
- X-40
- X-71
- EE-1
- GG-41 through GG-43
- GG-50a
- GG-80 through GG 86
- LL-31

2. Safari's internal CCTV video footage. On December 17, 2025, counsel Dane DeKrey emailed a letter requesting this footage to AUSA Melinda Williams, explaining that according to the John Ellis firm, the government has kept video-type discovery in its custody, available upon request. On December 22nd, counsel Bruce Ringstrom followed up by emailing ASUA Harry Jacobs. No CCTV footage or response have been received.

Mr. Ahmed requests a remote/Zoom hearing on the motion, in order to receive this material with enough time to prepare for his June 8, 2026 trial.

Date: March 10, 2026

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Dane', with a large, stylized loop at the end.

Dane DeKrey (#0397334)
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