

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

CASE NO. 19-20450-CR-SCOLA

UNITED STATES OF AMERICA

v.

ALEX NAIN SAAB MORAN,

Defendant.

PROTECTIVE ORDER

THIS CAUSE came before the Court upon the Government's Unopposed Motion for Protective Order Regulating Disclosure Of Discovery And Sensitive Information Contained Therein (ECF No. 75). Having considered the Government's Motion, and being otherwise fully advised in this premises, it is hereby **ORDERED** and **ADJUDGED** that the Government's Motion is **GRANTED**. Pursuant to Fed. R. Crim. P.16(d), it is further ordered that:

1. Counsel for the government and for the Defendant shall not provide the material responsive to the Standing Discovery Order to any person except as specified in the Court's order or by prior approval of the Court.
2. The Defendant shall possess the material responsive to the Standing Discovery Order only as necessary for counsel to prepare the case.
3. Employees of the government or defense counsel may possess the material responsive to the Standing Discovery Order, but only as necessary to prepare the case.
4. The defense shall not show or disseminate any of the Sensitive Information to anyone other than the named defendant, attorneys of record for the named defendant, U.S. attorneys working with the attorneys of record, and staff from that defense counsel's law office, and


U.S.-based paralegals, investigators, expert witnesses and interpreters working for that law office;

5. The defense and the defendant shall not disclose, whether orally or in writing, to anyone not covered by the Court's order any information relating to a cooperating witness, confidential informant or on-going investigation;
6. The defense shall not show or disseminate any of the Sensitive Information to any foreign (non-U.S.) attorneys or other foreign individuals, other than the foreign attorney known to the parties as PD;
7. The defense shall not transmit any of the Sensitive Information outside of the United States;
8. To the extent it is necessary for a defendant to possess any of the Sensitive Information to assist in his defense, the defendant agrees not to show or disseminate any of the Sensitive Information to anyone else;
9. An individual who is not a defendant nor part of the defense team may be shown Sensitive Information if that individual created the Sensitive Information or had otherwise previously seen the Sensitive Information (including if the defense team has a good faith basis to believe that individual had previously seen the Sensitive Information), as in the case for example of an individual copied on an email message
10. Third parties contracted by the government or the defense to provide expert analysis or testimony may possess the material responsive to the Standing Discovery Order, but only as necessary to prepare the case.
11. Counsel for the Defendant shall ensure that the Defendant and any third party that obtains access to the material responsive to the Standing Discovery Order are provided a copy of the Court's order. No third party that obtains access to or possession of the material

responsive to the Standing Discovery Order shall retain such access or possession unless authorized by the Court's order. Any third party that obtains access to or possession of the material responsive to the Standing Discovery Order shall promptly destroy or return the materials once the third party no longer requires access to or possession of the material responsive to the Standing Discovery Order to assist in the preparation of the case.

12. Upon entry of final order of the Court in this matter and conclusion of any direct appeals, counsel for the government and the Defendant shall destroy or cause to be destroyed all copies of the material responsive to the Standing Discovery Order, except that they may maintain copies in their closed case files following their ordinary procedures.
13. Counsel for the government and for the Defendant shall promptly report any known violations of the Court's order to the Court.

DONE and **ORDERED** in Miami, Florida, on November 29, 2021.


HON. ROBERT N. SCOLA, JR.
UNITED STATES DISTRICT JUDGE

Cc: counsel of record