

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF MISSISSIPPI

UNITED STATES OF AMERICA

v.

CASE NO. 1:15CR098-SA-DAS

JAELYN DELSHAUN YOUNG

PROTECTIVE ORDER FOR DISCOVERY

Upon motion of the United States, the Court being advised as to the nature of this case, and there being no objection by the parties, it is hereby

ORDERED that the motion for protective order pertaining to discovery is GRANTED.

1. IT IS FURTHER ORDERED that, pursuant to Rule 16(d) of the Federal Rules of Criminal Procedure, that the material, including unclassified and declassified information, provided by the government in this case not be reproduced or disseminated to persons not a party to, or involved in, this case, and that the defendant shall have access to the material in the presence of counsel who shall retain possession of the material.

2. IT IS FURTHER ORDERED that copies of discovery material only be provided to those persons employed by defense counsel, and who are necessary to assist counsel in preparation for trial, and to such persons as the defense deems necessary to further legitimate investigation and preparation of this case. All persons employed by defense counsel in this case shall receive a copy of the Protective Order.

3. IT IS FURTHER ORDERED that any person who receives a copy of any document subject to this protective order from defense counsel is prohibited from using such document in any way except to assist counsel for defendant in the investigation or preparation of this case, and from reproducing or disseminating any such document in any way to any other person or entity except as provided for in the order.

4. IT IS FURTHER ORDERED that all materials are to be used by the parties solely for the purpose of allowing the parties to prepare their case and that none of the materials produced by the government shall be disseminated by the government or the defense to the media.

5. IT IS FURTHER ORDERED that all materials that are provided to the defense in this case are now and will forever remain the property of the United States Government. Defense counsel will return the materials, and all copies thereof, to the government at the conclusion of the case and it will erase from its computers and servers any of the materials that exist in electronic form. Any derivative materials such as copies, transcripts, and any other product in any way derived from discovery materials shall be returned to the government at the conclusion of the case. Attorney work product derived from discovery materials, such as attorney notes, shall be destroyed when all matters in the case are resolved.

6. IT IS FURTHER ORDERED that information about the actual or cover personal identifiers of Online Covert Employees (OCE) shall be handled as follows:

A. The defendant and counsel (including any member of

the defense team or person subject to this Order) will not publicly disclose the actual or cover names, or any other identifying information, of any OCE in any pretrial filing or at any pretrial hearing in open court;

B. The defendant and counsel will not show or provide any declassified information about an OCE except to (i) members of the defense team (co-counsel, paralegals, investigators, translators, litigation support personnel, the defendant, and secretarial staff); and (ii) experts retained to assist in the preparation of the defense.

7. IT IS FURTHER ORDERED that any papers to be served upon the Court by either party that include sensitive materials as identified by either party, or refer to the contents of sensitive materials as identified by either party, shall be filed under seal. Neither the government nor the defense shall disclose any designated sensitive material to law witnesses.

8. IT IS FURTHER ORDERED that except as limited in Paragraph 6 above, this protective order does not in any manner limit the right of defense counsel to reproduce or disseminate any information or document obtained from sources other than the government even if the same information is within the material provided to the defense by the government in the discovery process.

9. IT IS FURTHER ORDERED that if the defendant obtains substitute counsel, the defense counsel of record will not transfer any portion of the discovery material or any copies, notes, transcripts, documents, or other information derived or prepared from the discovery material.

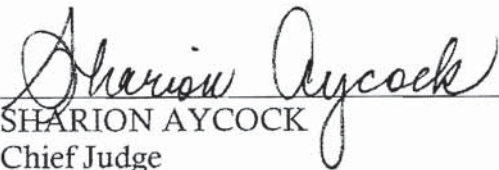
10. IT IS FURTHER ORDERED that this protective order does not apply to information that remains classified. All classified information will be governed by all applicable laws and rules applying to the disclosure and handling of classified

information, the Classified Information Procedures Act, 18 U.S.C. App. 3 § 1 et seq., and any Order of this Court.


11. IT IS FURTHER ORDERED that if any party believes an exception should be made to this protective order, the parties will confer and then seek guidance from this Court as necessary. The parties will advise the Court by letter of any agreed-upon exceptions made to the protective order.


12. IT IS FURTHER ORDERED that nothing in this Order shall preclude the government or the defendant from seeking a further protective order pursuant to Rule 16(d) as to particular items of discovery material.

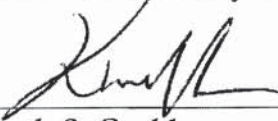
SO ORDERED on this 9th day of September, 2015.

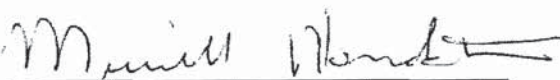

SHARION AYCOCK
Chief Judge
United States District Court
Northern District of Mississippi

Approved by:


Clay Joyner, AUSA
United States Attorney's Office


Robert H. Norman, AUSA
United States Attorney's Office


Kenneth S. Coghlan
Counsel for Defendant


Merrill Nordstrom

Counsel for Defendant