

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN

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UNITED STATES OF AMERICA,

Plaintiff,

v.

Case No. 19-CR-151

RUBEN NMI ORTIZ, JR.,  
ALEJANDRO NMI LOPEZ,  
FRANCISCO NMI MARTINEZ,  
HECTOR M. GOMEZ-SALAS,  
OSCAR NMI ALONSO,  
GABIEL Y. BONILLA,  
CEDRIC D. COHEN,  
TERRY A. JOHNSON,  
RICHARD D. GUYETTE,  
JAMES H. PARKINSON and  
STEPHANIE M. ORTIZ,

Defendants.

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**PROTECTIVE ORDER GOVERNING DISCOVERY**

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Upon the motion of the government and pursuant to Fed. R. Crim. P. 16(d), it is hereby **ORDERED**:

1. All of the discovery materials provided by the United States in preparation for, or in connection with, any stage of the proceedings in this case (collectively, “the materials”) are subject to this protective order and may be used by defense counsel (defined as the counsels of record in this case) solely in connection with the defense of this case, and for no other purpose, and in connection with no other proceeding, without further order of this Court.

2. Defense counsel shall not provide copies of the material directly to the defendants. The defense counsel may show copies of the materials to the defendants as necessary to prepare the defense, but defendants may not retain copies without prior permission of the Court.

3. Defendants and defense counsel shall not disclose the materials or their contents directly or indirectly to any person or entity other than persons employed to assist in the defense, persons who are interviewed as potential witnesses, counsel for potential witnesses, and other persons to whom the Court may authorize disclosure (collectively, “authorized persons”). With the exception of expert witnesses who may receive copies of the materials, potential witnesses and their counsel may be shown copies of the materials as necessary to prepare the defense, but may not retain copies without prior permission of the Court.

4. Defendants, defense counsel, and authorized persons shall not copy or reproduce the materials except as authorized by this Order. Such copies and reproductions shall be treated in the same manner as the original materials. Copies of the materials, redacted as to the names and identifying information of cooperating individuals, will be made available for the defendants review, in a private location within the jail or holding facility. The materials may not be copied or taken by the defendants to their cell or any other location other than the reviewing room within the jail.

5. The government has made available for each defendant a computer disk containing the discovery materials. The computer disk will be kept in the possession of the Brown County Jail, or any other facility maintaining custody of a defendant charged in this

case. The materials may be viewed by a defendant by arranging a time with the correctional facility staff. The defendant cannot print copies of any discovery materials.

6. Defendants are authorized to take notes summarizing the discovery materials or detailing questions they may have for counsel. These notes may be taken to and from their cell but shall not be disclosed to anyone other than an authorized person.

7. Before providing materials to an authorized person, defense counsel must provide the authorized person with a copy of this Order.

8. Upon conclusion of all stages of this case, all of the materials and all copies made thereof shall be disposed of in one of three ways, unless otherwise ordered by the Court. The materials may be (1) destroyed; (2) returned to the United States; or (3) retained in defense counsel's case file. In the event that the materials are retained by defense counsel, the restrictions of this Order continue in effect for as long as the materials are so maintained, and the materials may not be disseminated or used in connection with any other matter without further order of the Court.

9. The restrictions set forth in this Order do not apply to documents that are or become part of the public court record, including documents that have been received in evidence at other trials. Personal identifying information contained in any discovery material shall be redacted if the discovery material is filed with this Court. If it is necessary for the Court to review the personal identifying information contained within the discovery materials or a description thereof, such filing shall be made under seal.

10. Nothing contained in this Order shall preclude any party from applying to this Court for further relief or for modification of any provision hereof.

SO ORDERED this 25<sup>th</sup> day of September, 2019

*s/Nancy Joseph*

NANCY JOSEPH

United States Magistrate Judge