

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

CASE NO. 23-60173-CR-KMW-GRAHAM

UNITED STATES OF AMERICA

vs.

CAROLYN DENISE WADE,

Defendants.

**PROTECTIVE ORDER REGULATING DISCLOSURE OF
CERTAIN RECORDS AND SENSITIVE INFORMATION CONTAINED THEREIN**

The United States of America, having filed an unopposed motion for a protective order regulating the disclosure of records and sensitive information contained therein to defense counsel in this proceeding, and the Court finding good cause therefore:

IT IS HEREBY ORDERED that the government is authorized to disclose to counsel of record in this case certain records and sensitive information contained therein in the government's possession, custody, or control (the "Confidential Records");

IT IS FURTHER ORDERED that the government shall mark such Confidential Records, or any electronic folder containing such Confidential Records, as "Confidential";

IT IS FURTHER ORDERED that counsel of record for defendant in this proceeding shall hold the Confidential Records in strict confidence. Therefore, defense counsel shall restrict access to the Confidential Records, and shall disclose the Confidential Records to their clients, office staff, investigators, and to anticipated fact or expert witnesses only to the extent that defense counsel believes is necessary to assist in the defense of their clients in this matter and in a manner that will prohibit the disclosure of the Confidential Records to other persons not involved in the defense;

IT IS FURTHER ORDERED that counsel of record shall advise any person to whom the Confidential Records is disclosed that such information shall be held in strict confidence, and that further disclosure or dissemination is prohibited without defense counsel's express consent; and

IT IS FURTHER ORDERED that counsel of record shall obtain a certification from each person to whom the Confidential Records are disclosed, in which the recipient, (a) acknowledges these restrictions as set forth in the Protective Order of the Court, and (b) agrees that they will not disclose or disseminate the information without express consent of defense counsel. Counsel shall keep a copy of each certification to identify the individuals who received the Confidential Records and the date on which such information was first disclosed.

IT IS FURTHER ORDERED that counsel of record for the defendant agrees that, upon conclusion of the above captioned case, copies of the Confidential Records disclosed to defense counsel pursuant to the terms of this order shall be destroyed or returned to the United States.

DONE AND ORDERED in chambers at Miami, Florida, this __ day of May, 2024.

DONALD L. GRAHAM
SENIOR UNITED STATES DISTRICT JUDGE

cc: Counsel of record