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8 Attorneys for Plaintiff
UNITED STATES OF AMERICA

9 UNITED STATES DISTRICT COURT

10 FOR THE CENTRAL DISTRICT OF CALIFORNIA

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 KERWIN ALDRIC JORDAN,

15 Defendant.

No. 2:25-cr-801-SVW

STIPULATION AND JOINT REQUEST FOR
A PROTECTIVE ORDER REGARDING
DISCOVERY CONTAINING PERSONAL
IDENTIFYING INFORMATION AND
PRIVACY ACT INFORMATION

[PROPOSED ORDER FILED
SEPARATELY]

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19 Plaintiff, United States of America, by and through its counsel
20 of record, the First Assistant United States Attorney for the
21 Central District of California and Assistant United States Attorney
22 Ranee A. Katzenstein, and defendant Kerwin Aldric Jordan
23 ("defendant"), by and through his counsel of record, Deputy Federal
24 Public Defender Antonio Villaamil (collectively the "parties"), for
25 the reasons set forth below, request that the Court enter the
26 proposed protective order (the "Protective Order") governing the use
27 and dissemination of (1) personal identifying information ("PII") of
28 real persons pursuant to Federal Rule of Criminal Procedure Rule

1 16(d)(1), and (2) material that may contain information within the
2 scope of the Privacy Act.

3 Introduction and Grounds for Protective Order

4 1. Defendant is charged in this matter with violations of 26
5 U.S.C. § 7206(2): Aiding and Assisting in the Preparation of a False
6 Tax Return; and 18 U.S.C. § 1343: Wire Fraud. Defendant is released
7 on bond pending trial.

8 2. A protective order is necessary because the government
9 intends to produce to the defense materials containing third
10 parties' PII. The government believes that disclosure of this
11 information without limitation risks the privacy and security of the
12 information's legitimate owners. Because the government has an
13 ongoing obligation to protect third parties' PII, the government
14 cannot produce to defendant an unredacted set of discovery
15 containing this information without the Court entering the
16 Protective Order. Moreover, PII makes up a significant part of the
17 discovery in this case and such information itself, in many
18 instances, has evidentiary value. If the government were to attempt
19 to redact all this information in strict compliance with Federal
20 Rule of Criminal Procedure 49.1, the Central District of
21 California's Local Rules regarding redaction, and the Privacy Policy
22 of the United States Judicial Conference, the defense would receive
23 a set of discovery that would be highly confusing and difficult to
24 understand, and it would be challenging for defense counsel to
25 adequately evaluate the case, provide advice to defendant, or
26 prepare for trial.

27 3. An order is also necessary because the government intends
28 to produce to the defense materials that may contain information

1 within the scope of the Privacy Act, 5 U.S.C. § 552a ("Privacy Act
2 Information"). To the extent that these materials contain Privacy
3 Act Information, an order is necessary to authorize disclosure
4 pursuant to 5 U.S.C. § 552a(b)(11).

5 4. The purpose of the Protective Order is to (a) allow the
6 government to comply with its discovery obligations while protecting
7 this sensitive information from unauthorized dissemination, and
8 (b) provide the defense with sufficient information to adequately
9 represent defendant.

10 Definitions

11 5. The parties agree to the following definitions:

12 a. "PII Materials" includes any information that can be
13 used to identify a person, including a name, address, date of birth,
14 Social Security number, driver's license number, telephone number,
15 account number, email address, or personal identification number.

16 b. "Confidential Information" refers to any document or
17 information containing PII Materials that the government produces to
18 the defense pursuant to this Protective Order and any copies
19 thereof.

20 c. "Defense Team" includes (1) defendant's counsel of
21 record ("defense counsel"); (2) other attorneys at defense counsel's
22 law firm who may be consulted regarding case strategy in this case;
23 (3) defense investigators who are assisting defense counsel with
24 this case; (4) retained experts or potential experts; and
25 (5) paralegals, legal assistants, and other support staff to defense
26 counsel who are providing assistance on this case. The Defense Team
27 does not include defendant, defendant's family members, or any other
28 associates of defendant.

Terms of the Protective Order

6. The parties jointly request the Court enter the Protective Order, which will permit the government to produce Confidential Information in a manner that preserves the privacy and security of third parties. The parties agree that the following conditions in the Protective Order will serve these interests:

a. The government is authorized to provide defense counsel with Confidential Information marked with the following legend: "CONFIDENTIAL INFORMATION -- CONTENTS SUBJECT TO PROTECTIVE ORDER." The government may put that legend on the digital medium (such as DVD or hard drive) or simply label a digital folder on the digital medium to cover the content of that digital folder. The government may also redact any PII contained in the production of Confidential Information.

b. If defendant objects to a designation that material contains Confidential Information, the parties shall meet and confer. If the parties cannot reach an agreement regarding defendant's objection, defendant may apply to the Court to have the designation removed.

c. Defendant and the Defense Team agree to use the Confidential Information solely to prepare for any pretrial motions, plea negotiations, trial, and sentencing hearing in this case, as well as any appellate and post-conviction proceedings related to this case.

d. The Defense Team shall not permit anyone other than the Defense Team to have possession of Confidential Information, including defendant, while outside the presence of the Defense Team.

1 e. At no time, under no circumstance, will any
2 Confidential Information be left in the possession, custody, or
3 control of defendant, regardless of defendant's custody status.

4 f. Defendant may review PII Materials only in the
5 presence of a member of the Defense Team, who shall ensure that
6 defendant is never left alone with any PII Materials. At the
7 conclusion of any meeting with defendant at which defendant is
8 permitted to view PII Materials, defendant must return any PII
9 Materials to the Defense Team, and the member of the Defense Team
10 present shall take all such materials with him or her. Defendant
11 may not take any PII Materials out of the room in which defendant is
12 meeting with the Defense Team.

13 g. Defendant may see and review Confidential Information
14 as permitted by this Protective Order, but defendant may not copy,
15 keep, maintain, or otherwise possess any Confidential Information in
16 this case at any time. Defendant also may not write down or record
17 any data or information contained in the Confidential Information.

18 h. The Defense Team may review Confidential Information
19 with a witness or potential witness in this case, including
20 defendant. A member of the Defense Team must be present if PII
21 Materials are being shown to a witness or potential witness. No
22 member of the Defense Team shall permit a witness or potential
23 witness to retain Confidential Information or any notes generated
24 from Confidential Information.

25 i. The Defense Team shall maintain Confidential
26 Information safely and securely, and shall exercise reasonable care
27 in ensuring the confidentiality of those materials by (1) not
28 permitting anyone other than members of the Defense Team, defendant,

1 witnesses, and potential witnesses, as restricted above, to see
2 Confidential Information; (2) not divulging to anyone other than
3 members of the Defense Team, defendant, witnesses, and potential
4 witnesses, the contents of Confidential Information; and (3) not
5 permitting Confidential Information to be outside the Defense Team's
6 offices, homes, vehicles, or personal presence.

7 j. To the extent that defendant, the Defense Team,
8 witnesses, or potential witnesses create notes that contain, in
9 whole or in part, Confidential Information, or to the extent that
10 copies are made for authorized use by members of the Defense Team,
11 such notes, copies, or reproductions become Confidential Information
12 subject to the Protective Order and must be handled in accordance
13 with the terms of the Protective Order.

14 k. The Defense Team shall use Confidential Information
15 only for the litigation of this matter and for no other purpose.
16 Litigation of this matter includes any appeal filed by defendant and
17 any motion filed by defendant pursuant to 28 U.S.C. § 2255. In the
18 event that a party needs to file Confidential Information with the
19 Court or divulge the contents of Confidential Information in court
20 filings, the filing should be made under seal. If the Court rejects
21 the request to file such information under seal, the party seeking
22 to file such information publicly shall provide advance written
23 notice to the other party to afford such party an opportunity to
24 object or otherwise respond to such intention. If the other party
25 does not object to the proposed filing, the party seeking to file
26 such information shall redact any PII Materials and make all
27 reasonable attempts to limit the divulging of PII Materials.

1 l. The parties agree that any Confidential Information
2 inadvertently produced in the course of discovery prior to entry of
3 the Protective Order shall be subject to the terms of the Protective
4 Order. If Confidential Information was inadvertently produced prior
5 to entry of the Protective Order without being marked "CONFIDENTIAL
6 INFORMATION -- CONTENTS SUBJECT TO PROTECTIVE ORDER," the government
7 shall reproduce the material with the correct designation and notify
8 defense counsel of the error. The Defense Team shall take immediate
9 steps to destroy the unmarked material, including any copies.

10 m. Confidential Information shall not be used by the
11 defendant or Defense Team, in any way, in any other matter, absent
12 an order by this Court. All materials designated subject to the
13 Protective Order maintained in the Defense Team's files shall remain
14 subject to the Protective Order unless and until such order is
15 modified by this Court.

16 n. In the event that there is a substitution of counsel
17 prior to when such documents must be returned, new defense counsel
18 must be informed of, and agree in writing to be bound by, the
19 requirements of the Protective Order before the undersigned defense
20 counsel transfers any Confidential Information to the new defense
21 counsel. New defense counsel's written agreement to be bound by the
22 terms of the Protective Order must be returned to the Assistant U.S.
23 Attorney assigned to the case. New defense counsel then will become
24 the Defense Team's custodian of materials designated subject to the
25 Protective Order.

26 o. Defense counsel agrees to advise defendant and all
27 members of the Defense Team of their obligations under the
28 Protective Order and ensure their agreement to follow the Protective

Order, prior to providing defendant and members of the Defense Team with access to any materials subject to the Protective Order.

p. Defense Counsel has conferred with defendant regarding this stipulation and the proposed order thereon, and defendant agrees to the terms of the proposed order.

q. Accordingly, the parties have agreed to request that the Court enter a protective order in the form submitted herewith.

IT IS SO STIPULATED.

DATED: Nov. 12, 2025

BILAL A. ESSAYLI
First Assistant United States
Attorney

ALEXANDER B. SCHWAB
Assistant United States Attorney
Acting Chief, Criminal Division

_____/s/_____
RANEE A. KATZENSTEIN
Assistant United States Attorney

Attorneys for Plaintiff
UNITED STATES OF AMERICA

DATED: Nov. 14, 2025


ANTONIO VILLAAMIL
Attorneys for Defendant
KERWIN ALDRIC JORDAN