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UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

PORTLAND DIVISION

UNITED STATES OF AMERICA	**3:26-cr-00205-AN-01**
v.	**UNOPPOSED MOTION FOR PROTECTIVE ORDER**
DAVID STARLING,	
Defendant.	

The United States of America respectfully moves this Court for a protective order limiting the copying and dissemination of certain materials set forth below. Defendant's counsel does not object to this motion. In the interest of providing timely discovery to the defendant, the government respectfully requests that the Court enter the accompanying order.

The discovery material in the case includes highly sensitive information, including personal and financial information. Due to the large volume of discovery material, the frequency

with which the sensitive information appears throughout the documents, and the nature of the violations charged in this case, redaction of all discovery is not a feasible option.

As such, the government respectfully requests that the Court order that defendant's counsel shall not provide copies of the discovery material produced by the government to defendant which contains personal identifying information or financial information, defined as follows:

(a) Personal Information: personal identifying information of any individual, including without limitation, any individual's date of birth, social security number, address, telephone number, email address, driver's license number, professional license number, or family members' names; or

(b) Financial Information: financial information of any individual or business, including without limitation, bank account numbers, credit or debit card numbers, account passwords, account names and contact information, account history, account balances, account statements, tax return information, or taxpayer identification numbers,

unless defense counsel first redacts the Personal Information or Financial Information from the discovery materials or if the Personal Information or Financial Information is the defendant's own information.

The government further moves the Court to order that defendant's counsel and defendant neither share any discovery material produced by the government with others not involved in case-related activities nor make any public disclosure of the same, without the government's express written permission, except that defense counsel may provide discovery materials to those persons employed by defense counsel who are necessary to assist counsel for trial or other proceedings.

These restrictions should not hinder defendant's ability to prepare for trial and will protect others from potential harassment or exposure to misuse of their personal and financial information. Defense counsel is free to raise any issues regarding this protective order during the course of this litigation should this order impact counsel's representation of defendant.

For the foregoing reasons, the government respectfully requests that the Court enter the proposed Protective Order.

Dated: June 11, 2026

Respectfully submitted,

SCOTT E. BRADFORD
United States Attorney

/s/ Meredith D.M. Bateman
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