

STATE OF INDIANA)
) SS:
COUNTY OF CARROLL)

IN THE CARROLL CIRCUIT COURT

STATE OF INDIANA)
)
) VS.
)
RICHARD M. ALLEN)

CAUSE NUMBER: 08C01-2210-MR-00001

**STATE’S MOTION REQUESTING PROTECTIVE ORDER GOVERNING
DISCOVERY**

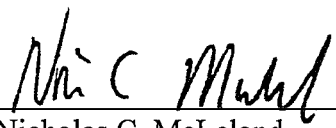
Now comes the State of Indiana, by Prosecuting Attorney Nicholas C. McLeland, and advises that the State has filed charges against the Defendant, under the above referenced cause number. That pursuant to Rule 26 of the Indiana Rules of Trial Procedure, the Defendant is entitled to discovery which includes materials of a sensitive nature. Therefore, pursuant to the provision of Rule 26(C), the State requests that the Court issue a protective Order governing these materials as follows:

1. That one copy of the discovery material shall be provided to Counsel for the Defendant.
2. That the discovery material shall not be used for any purpose other than to prepare for the defense in the above referenced cause number.
3. That the discovery material shall not be publicly exhibited, displayed, shown, used for educational, research or demonstrative purposes or used in any other manner, except in judicial proceedings in the above referenced action.
4. That the discovery material may be viewed only by parties, counsel and counsel’s investigators and experts.
5. That if copies of the discovery material are made and provided to the Defendant, investigators or experts for the Defense, that sensitive and private information contained in the discovery shall be redacted, including any social security numbers, IDAC information or NCIC information, any information related to the personal information of juveniles, including social security numbers, names and date of birth and any FBI sentinel information.
6. That discovery material shall not be distributed to any person not authorized to

view it, including witnesses, family members, relatives and friends of the Defendant.

7. That no person other than the Defendant, Counsel for the Defendant and those persons listed in paragraph 5 shall be granted access to said discovery material, or the substance of any portion thereof unless that person has signed an agreement in writing that he or she has received a copy of this Order and that he or she submits to the Court's jurisdiction and authority with respect to the material; agrees to be subject to the Court's contempt powers for any violation of this Order; and is granted prior permission by this Court to access said discovery material.
8. That upon final disposition of the case, the discovery material referred to in paragraph 1 and any and all transcripts shall be returned to the Carroll County Prosecutor's Office or maintained by Defense Counsel pursuant to the terms herein.
9. That Counsel for the Defendant shall be responsible to ensure that all persons involved in the defense of this case comply with this Order.
10. That the written documents/records provided by the State with the discovery material fall under the same rules as described above.

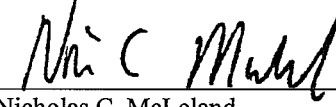
Wherefore the State respectfully asks that the Court to issue an Order protecting the sensitive material distributed to the Defense and for all other just and proper relief in the premises.



Nicholas C. McLeland
Attorney #28300-08
Prosecuting Attorney

CERTIFICATE OF SERVICE

The undersigned certifies that a copy of the foregoing instrument was served upon the Defendant's attorney of record, through personally delivery, ordinary mail with proper postage affixed or by service through the e filing system and filed with Carroll Circuit Court, this __13th__ day of February, 2023.



Nicholas C. McLeland
Attorney #28300-08
Prosecuting Attorney