

UNITED STATES DISTRICT COURT  
DISTRICT OF CONNECTICUT

UNITED STATES OF AMERICA	:	
	:	Criminal No. 3:20cr193(MPS)
v.	:	
	:	
KYLE FASOLD	:	

**PROTECTIVE ORDER**

IT IS HEREBY ORDERED, pursuant to Rule 16(d)(1) of the Federal Rules of Criminal Procedure, that the Government will provide defense counsel with the Video identified in the Government’s Memorandum in Support of a Protective Order.

IT IS FURTHER ORDERED THAT, except as permitted by this Order, or other court order, defense counsel shall not disclose, play or otherwise reveal the contents of the Video to another person, except that:

- a. defense counsel may show such material to the defendant;
- b. defense counsel may permit secretaries, clerical workers, paralegals, investigators hired by defense counsel, and experts retained to assist in the preparation of this case for trial to view the transcripts, statements, reports, memoranda, images, videos, and other discovery material solely for the purpose of assisting counsel to prepare for any trial, pre-trial litigation (e.g., in connection with the competency proceedings), sentencing or appeal.

IT IS FURTHER ORDERED THAT defense counsel shall take appropriate measures to ensure that each person to whom the defense discloses the Video covered by this Order, including counsel’s representatives and employees, is provided with a copy of this protective order and understands the limited purpose for which the Video is being disclosed and the prohibition against further dissemination;

IT IS FURTHER ORDERED THAT any notes or recorded notations of any kind that defense counsel, their secretaries, clerical workers, paralegals, investigators, or experts may make relating to the contents of the Video shall not be shown to anyone except their own client, and then only for the sole purpose of the defense of the charges in this case, and all members of the defense team shall maintain the confidentiality of these materials pursuant to the terms of this Order after this case is disposed of by trial, appeal, if any, or other resolution of the charges against the defendant;

IT IS FURTHER ORDERED THAT, in the event the terms of this Order are violated, defense counsel shall advise counsel for the United States immediately of the nature and circumstances of such violation.

IT IS FURTHER ORDERED THAT nothing contained in this Order shall restrict or prevent any party from describing the content of the Video in court papers filed in this case, provided such filings are made under seal where appropriate; and

FINALLY, IT IS ORDERED THAT this Order is entered without prejudice to either party's right to seek a revision of the Order by appropriate motion to the Court.

SO ORDERED this 19 day of July , 2021, at Hartford, Connecticut.

/s/  
HONORABLE MICHAEL P. SHEA UNITED  
STATES DISTRICT JUDGE