

STATE OF MAINE
PENOBSCOT, ss.

UNIFIED CRIMINAL DOCKET
PENCD-CR-23-2138

STATE OF MAINE)
)
 v.)
)
 GERALD MERRILL)
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)

**STATE’S MOTION FOR
PROTECTIVE ORDER
(M.R.U. Crim. P. 16(b)(6))**

NOW COMES the State of Maine, by and through its undersigned attorney, and moves for a protective order pursuant to Maine Rule of Unified Criminal Procedure 16(b)(6). In support of its motion, the State states as follows:

1. The State is in possession of personal identifiable information (PII) protected by Section 119.0712(2), Florida Statutes (2023).
2. Documents relating to the investigation and prosecution of this case include detailed financial information belonging to third parties, including account identifiers and/or other personal identifiable information (PII).
3. The State is in possession of a Suspicious Activity Report (SAR), maintained by the Internal Revenue Service and subject to limitations on its dissemination, 31 U.S.C. § 5311 et seq. (the Bank Secrecy Act).
4. The State has submitted a proposed protective order which it believes properly addresses the need to secure the above referenced evidence, but also conforms with the State’s duty to disclose discovery in criminal cases.
5. Walter F. McKee, attorney for the Defendant, **does not object** to the filing of this motion.

WHEREFORE, the State respectfully requests that the Court issue the included proposed protective order for the aforementioned reasons.

Dated: September 13, 2023

/s/ Charles Boyle

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