

2. Defense counsel is required (i) to use the confidential information only as necessary to prepare and present his client's defense; (ii) not to leave the confidential information in the control or custody of the defendant; (iii) not to leave the confidential information in the control or custody of any person who is not a professional member of the defense team (e.g., attorneys, para-legals, legal assistants, and expert witnesses); and (iv) to collect and return to the government all paper and electronic copies of the confidential information at the conclusion of this case.

3. Any confidential information disclosed by the government throughout the course of this case shall be used by the defendant, his counsel, and his counsel's agents only for purposes of preparing for and conducting the trial in this action, and for pursuing any appeals in this action. The parties may also use confidential information as exhibits at trial, assuming it is otherwise admissible.

4. The following information contained within disclosed confidential information is "confidential identifying information":

- a. social security numbers;
- b. driver's license numbers;
- c. other numbers issued for purposes of identification;
- d. dates of birth;
- e. addresses;
- f. bank account numbers; and
- g. other numbers associated with credit or debit cards or financial instruments.

5. In the context of witness interviews conducted as part of either party's trial preparation in this matter, disclosed documents containing confidential identifying information may be shown

to the witness, provided the witness is not permitted to retain copies of such documents or take notes regarding the confidential identifying information contained therein.

6. To the extent consistent with the other provisions of this Order, the confidential information may be provided by the parties to the following “designated persons”:

a. All personnel employed full-time by the United States that are associated with this matter, the defendant’s attorney, and his law firm;

b. Independent expert witnesses or expert advisors retained by either party or their attorneys in connection with this criminal action;

c. Witnesses or witnesses’ counsel prior to trial, provided, however, that confidential identifying information must be redacted from confidential information shown to witnesses or their attorneys unless the copies shown are the witnesses’s own tax returns, financial records, or identifying information; and

d. Such other persons as may hereinafter be authorized by the Court upon motion by the parties, provided, however, that confidential identifying information must be redacted from such copies unless the Court specifically authorizes the disclosure of unredacted documents.

7. The parties shall provide a copy of this Order to the designated persons (with the exception of personnel employed by the United States who are directly involved with this case, including any employee of the Federal Bureau of Investigation) to whom they provide the confidential information in the manner set forth above. Designated persons shall be subject to the terms of this Order. By accepting disclosure of confidential documents or information, such designated persons shall be deemed to submit themselves to the jurisdiction of the court for purposes of enforcement of this Protective Order.

8. The provisions of this Order shall not be construed as preventing the disclosure of any information in any motion, hearing, trial, or appeal held in this action, or to any Judge or Magistrate Judge of this Court, the United States Court of Appeals for the Eleventh Circuit, or the United States Supreme Court for purposes of this action.

9. Nothing in this Order shall restrict the use of documents or information obtained by a defendant from a source other than the United States' discovery production, provided that the defendant obtained such documents or information legally and under no obligation of confidentiality to the source. To the extent the United States' discovery production contains documents that are also publicly available (without fault of a defendant), nothing in this order shall restrict the use of such documents by a defendant notwithstanding the bates number attached to the document that demonstrates that it was produced as part of the United States' discovery in this action.

DONE this the ____ day of _____, _____.

U.S. MAGISTRATE JUDGE