

IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA

v.

MARCEL LEHEL LAZAR

a/k/a "GUCCIFER"  
a/k/a "GUCCIFER SEVEN"  
a/k/a "MICUL FUM"  
a/k/a "MARCEL LAZAR LEHEL"

Defendant.

Criminal No. 1:14-CR-213

Honorable James C. Cacheris

Trial: September 12, 2016

**GOVERNMENT'S UNOPPOSED MOTION FOR ENTRY  
OF AGREED PROTECTIVE ORDER**

The United States, through undersigned counsel, respectfully moves the Court under Federal Rule of Criminal Procedure 16(d)(1) to enter the attached proposed protective order to limit the parties' use of sensitive discovery in this case to case-related matters. The proposed order, to which defendant Marcel Lehel Lazar agrees, states that protected materials provided by the United States to the defendant shall be: (1) maintained in a secure manner by defense counsel; (2) reviewed only by the defendant, his attorneys of record, and those attorneys, paralegals, investigators, experts, and legal assistants who are employed by or working with defendant's attorneys of record and performing work in connection with their representation of defendant in this case; (3) restricted in their access by and disclosure to others, as further provided in the order; and (4) returned to the U.S. Attorney's Office at the conclusion of the litigation of the case and at the government's request.

The government has consulted with defense counsel on this matter, and defense counsel has indicated that defendant agrees to the entry of the proposed order.

Respectfully submitted,

Dana J. Boente  
United States Attorney

By:  /s/ Maya D. Song  
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**CERTIFICATE OF SERVICE**

I hereby certify that on April 26, 2016, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will automatically send electronic notification of such filing (NEF) to the following:

Shannon S. Quill  
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1650 King Street, Suite 500  
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*Counsel for defendant Marcel Lehel Lazar*

/s/ Maya D. Song  
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MARCEL LEHEL LAZAR

a/k/a "GUCCIFER"  
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a/k/a "MARCEL LAZAR LEHEL"

Defendant.

Criminal No. 1:14-CR-213

The Honorable James C. Cacheris

**AGREED PROTECTIVE ORDER**

Upon motion of the government, and with the agreement of the Defendant MARCEL LEHEL LAZAR, by and through his counsel, it is hereby

ORDERED THAT pursuant to its obligations under Part I of the Court's Discovery Order, the United States shall produce to defense counsel electronic copies of electronic communications by alleged victims, law enforcement reports that name alleged victims, and evidence the United States must produce as part of its discovery obligations that contains financial and personally identifiable information ("PII"). Such information will be marked "UNDER PROTECTIVE ORDER."

It is further ORDERED that as used in this Order, PII includes bank account numbers, credit card numbers, Social Security numbers, birth dates, names of victims or their family members, home addresses, telephone numbers, and any other information that, in combination with any other non-personally identifying information, would serve to identify an individual.

It is further ORDERED that defense counsel shall be responsible for maintaining the marked discovery materials provided by the government in a secure manner. Specifically, when not in use, the marked materials shall be maintained in a secure room, safe, file drawer, or cabinet. For purposes of this Order, the marked materials are “in use” if defense counsel is traveling or otherwise away from the office and has taken the marked materials with him or her for work on the case.

It is further ORDERED that access to the marked materials shall be restricted to persons authorized by this Order, namely:

- a. the attorneys of record, and
- b. attorneys, paralegals, investigators, experts, and legal assistants employed by or working with the attorneys of record and performing work in connection with their representation of the Defendant in this case.

Consistent with the Court’s Discovery Order, defense counsel may review the marked materials with the Defendant but cannot provide a copy of the materials to him.

It is further ORDERED that the following restrictions are placed on defense counsel, the Defendant, and the above-designated individuals, unless and until further ordered by the Court.


Defense counsel, the Defendant, and the above-designated individuals shall not:

- a. disclose any of the information contained in the marked materials unless the disclosure is reasonably and in good faith calculated to aid defense counsel in the interview or examination of a witness;
- b. allow copies of the marked materials to leave the control of the above-designated individuals; or
- c. permit others to make copies of the marked materials.

It is further ORDERED that upon conclusion of this case, defense counsel and the above-designated persons shall keep the materials secure until after the last appeal is final. At the conclusion of the litigation of the case, and at the request of the government and consistent with

the ethical responsibilities of defense counsel, all marked materials and reproductions thereof shall be returned to the U.S. Attorney's Office.

Date: 4/27/16  
Alexandria, Virginia



/s/  
James C. Cacheris  
United States District Judge

We ask for this:

Dana J. Boente  
United States Attorney

/s/ Maya D. Song  
Maya D. Song  
Jay V. Prabhu  
Assistant United States Attorneys

Seen and Agreed:

/s/ Shannon S. Quill  
Shannon S. Quill  
Assistant Federal Public Defender  
Counsel for Defendant Marcel Lazar