

STATE OF MAINE  
AROOSTOOK, ss.

UNITED CRIMINAL DOCKET  
DOCKET NO. AROCD-CR-2019-40788

STATE OF MAINE )  
 )  
 v. )  
 )  
 CINDY DESCHAINED )

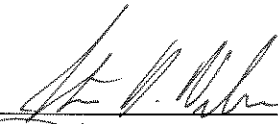
PROTECTIVE ORDER

Pursuant to the Court's authority under M.R.U. Crim. P. 16(b)(6) and consistent with *Brady v. Maryland*, 373 U.S. 83 (1963), it is hereby **ORDERED**:

The State will be disclosing in discovery certain records of Maine Revenue Services concerning the employment of the Defendant's Spouse. These materials may be used by defense counsel in his preparation of the Defendant's case and by either party at trial or in any Court proceeding in this matter. Defense counsel may share the contents of these materials with the Defendant as defense counsel sees fit in his professional judgment in order to prepare for proceedings in this matter. Defense counsel shall not copy said materials to Defendant and defense counsel shall not copy said materials or disclose them, or the information in them, to any person other than any expert(s) retained by defense counsel to work on this case or defense counsel's staff, *absent further order of the court.*

DATED:

*4/14/22*

  
\_\_\_\_\_  
Justice/Judge

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MOTION FOR PROTECTIVE ORDER  
[M.R.U. Crim. P. 16(b)(6)]

CARIBBEAN COURTS  
APR 14 '23 AM 10:29

Now comes the State, by and through counsel, and respectfully requests that this Honorable Court issue a protective order regarding certain records of Maine Revenue Services.

In support of its motion, the State states as follows:

1. The Defendant is charged with theft and attempted theft of income tax refunds through jointly filed income tax returns.
2. The State has previously provided the Defendant, through counsel, with discovery materials pursuant to M.R.U. Crim. P. 16 and *Brady v. Maryland*, 373 U.S. 83 (1963).
3. The previously provided discovery materials included the wage records of the Defendant's spouse ("Spouse").
4. The State is now in possession of records of Maine Revenue Services containing the same substantive information about the Spouse's wages as previously provided in the form of copies of the Spouse's IRS Form W2s.
5. The records of Maine Revenue Services concerning the Spouse's employment are confidential pursuant to 36 M.R.S. § 191(a).
6. The records of Maine Revenue Services concerning the Spouse's wages and withholdings are relevant to the prosecution of the Defendant.
7. The undersigned contacted defense counsel regarding this motion but has not heard back regarding his position on it.

Wherefore, the State respectfully requests that this Honorable Court issue a protective order regarding the records of Maine Revenue Services concerning the Spouse's wages and withholding.

Dated: April 13, 2022

Respectfully submitted,

/s/ Elizabeth T. Weyl  
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