

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
NORTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

NATHAN WEEDEN,

Defendant.

Case No. 2:23-cr-07

Honorable Robert J. Jonker
United States District Judge

**STIPULATED MOTION FOR ENTRY OF A PROTECTIVE ORDER
GOVERNING DISCOVERY**

Pursuant to Rule 16(d) of the Federal Rules of Criminal Procedure, the United States of America, by Nils Kessler, Assistant United States Attorney for the Western District of Michigan, and Elizabeth LaCosse, Assistant Federal Public Defender for said district, hereby respectfully move for the entry of a protective order, and in support thereof states as follows:

1. The indictment in this case charges the defendant with one count of conspiracy against rights in violation of Title 18, United States Code, Section 241, and one count of damage to religious property, in violation of Title 18, United States Code, Section 247.
2. The discovery to be turned over to the defense includes, amount other things, statements of the defendants, reports of the investigation, and communication among and between the defendant and others.

3. The discovery materials include potential identifying information regarding subjects in an ongoing investigation and law enforcement employees involved in such investigation. The investigation has also relied on undercover law enforcement activity. Unnecessary disclosure of such information would be detrimental to an ongoing investigation and would present a serious safety risk to individuals involved. While the government will redact certain information, a discovery protective order is necessary to limit unnecessary disclosures.

WHEREFORE, the parties respectfully move this Court to enter the proposed protective order.

Respectfully submitted,

MARK A. TOTTEN
United States Attorney

Dated: August 2, 2023

/s/ Nils R. Kessler
NILS R. KESSLER
Assistant United States Attorney
P.O. Box 208
Grand Rapids, MI 49501-0208
(616) 456-2404
nils.kessler@usdoj.gov

SHARON A. TUREK
Federal Public Defender

/s/ Elizabeth LaCosse(with permission)
ELIZABETH LACOSSE
Assistant Federal Public Defender
Federal Public Defender Office
925 W. Washington Street, Suite 104
Marquette, Michigan 49855