

WWM-CR24-191149-T : SUPERIOR COURT
STATE OF CONNECTICUT : JUDICIAL DISTRICT OF WINDHAM
V. 2024 DEC 17 A 9 2:1 AT DANIELSON
MARILYN APONTE : DECEMBER 17, 2024

STATE'S MOTION FOR PROTECTIVE ORDER

Pursuant to Connecticut General Statutes § 54-33c and Connecticut Practice Book §§ 36-2(b) & (c), §40-40 et. seq., and §42-49A(c), the State of Connecticut requests that the Court order that the supporting search warrant and arrest warrant affidavits be sealed from public inspection or disclosure, and no such information nor copies of such affidavits nor other records be released to any party, without further court orders that such disclosure be limited under such terms and conditions as it finds reasonable.

In support of this motion, the State claims there is good cause for the state's interest in continuing nondisclosure, and that such good cause substantially outweighs the defendant's and public's right to disclosure, insofar as:

- 1) The information within the affidavits provides information wherein the identity of confidential sources would be easily ascertained, endangering the life or physical safety of such sources,
- 2) Release of such information could lead to the flight from prosecution by other suspects,
- 3) Release of such information could lead to the destruction of or tampering with evidence,
- 4) Release of such information could lead to the intimidation of potential witnesses, or

5) Release of such information would otherwise seriously jeopardize ongoing criminal investigations.

Moreover, pursuant to Connecticut General Statute §36-2(b), this order would not limit the disclosure of such affidavits to the defendant's attorneys, subject to reasonable restrictions related to further disclosure of the contents of such affidavits.

The State respectfully requests this order remain in effect throughout the duration of the case based upon the continuing and ongoing concerns as set forth above.

THE STATE OF CONNECTICUT

By 
Asheley G. Pankratz
Deputy Assistant State's Attorney

CERTIFICATION

This is to certify that a true copy of the foregoing was delivered defense counsel, as required by Connecticut Practice Book §10-12.


Asheley G. Pankratz
Deputy Assistant State's Attorney

ORDER

The foregoing motion, having been presented to the Court, it is hereby ordered:

GRANTED/DENIED.

BY THE COURT

_____ J.