

IN THE IOWA DISTRICT COURT FOR _____ COUNTY

STATE OF IOWA,
Plaintiff

vs.

Defendant

Criminal No. _____

**APPLICATION FOR
PROTECTIVE ORDER**

COMES NOW, _____, as Prosecuting Attorney for _____ County, Iowa and in support of its Application for a Protective Order in the above-captioned matter, state the following:

The Defendant has filed a motion for discretionary discovery pursuant to Rule 2.14(2)(b) of the Iowa Rules of Criminal Procedure. Some of the items seized by law enforcement officers which are the subject of the Defendant's Motion for Discovery, include computers and computer related hardware and software, printed documents and other media that contain digital and graphical depictions of alleged minors engaging in or simulating prohibited sexual acts.

Out of consideration for the victim(s) depicted in these digital and graphical representations of minors engaged in or simulating prohibited sexual acts, the Court should enter a Protective Order pursuant to Iowa R. Crim. P. Rule 2.14(6)(a) that will govern the discovery and use of said evidence. In addition, a Protective Order would protect the victim(s) from having these images further distributed or disseminated in violation of state and federal laws.

WHEREFORE, the State respectfully requests that the Court enter a Protective Order regarding the discovery and use of the aforementioned evidence, including, but not limited to, the method of disclosure to the Defendant, limits on further distribution and dissemination, destruction of the evidence upon the conclusion of this matter and sanctions for violating any of the Court's orders.

DATED this ____ day of _____, 200__.

PROSECUTING ATTORNEY
_____ County