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October 31, 2023

Michele Hagen, Associate Clerk  
Androscoggin County Superior Court  
2 Turner Street  
Auburn, ME 04210

FILED VIA SHAREFILE

Sherri Harvey, Associate Clerk  
Sagadahoc County Superior Court  
101 New Meadows Road  
West Bath, ME 04530

RE: State of Maine v. Robert Card  
Docket Nos.: ANDCR-CR-23-3004/SW-23-163/SW-23-165/SW-23-(Search warrant  
for 207-837-3761

Dear Ms. Hagen and Ms. Harvey:

Enclosed for filing please find State's Motion to Redact Affidavit for Warrant of Arrest and Search Warrant Affidavits at SW-23-163, SW-23-165 and Search Warrant Affidavit for 207-837-3761 in the above-referenced matters.

I am sending these motions to both courts as we had search warrants filed in both counties. Please let me know if you should have any questions. Thank you for your assistance.

Sincerely,

A handwritten signature in black ink, appearing to read "Leane Zainea".

Leane Zainea  
Assistant Attorney General  
Criminal Division

LZ/tlc  
Enclosures

STATE OF MAINE  
ANDROSCOGGIN, SS

UNIFIED CRIMINAL DOCKET  
LEWISTON  
DOCKET NO. ANDCD-CR- 23-3004/  
SW-23-163/165/SW-23-\_\_\_\_\_

STATE OF MAINE )  
)  
)

v. )  
)  
)

ROBERT CARD )  
)

Defendant )  
)

MOTION TO REDACT  
AFFIDAVIT FOR WARRANT OF  
ARREST and SEARCH WARRANTS  
AFFIDAVITS AT SW-23-163 (1007 West  
Road, Bath), SW-23-165 (White Subaru)  
and SEARCH WARRANT AFFIDAVIT  
for 207-837-3761

NOW COMES the attorney for the State of Maine, and moves this Honorable Court to redact certain portions of the arrest warrant affidavit at CR-23-3004 and the search warrant affidavits at SW-23-163 (1007 West Road, Bath), SW-23-165 (White Subaru) and search warrant affidavit for 207-837-3761 before vacating the Impoundment Order. In support, undersigned counsel submits as follows:

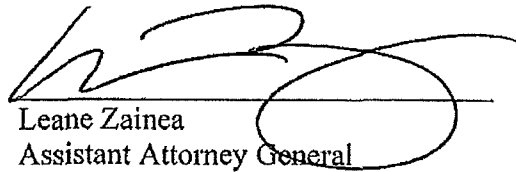
1. Undersigned counsel understands that this Court may grant the State's request to discontinue the Impoundment Order of the arrest warrant affidavit at CR- 23-3004 and the search warrant affidavits at SW-23-163 (1007 West Road, Bath), SW-23-165 (White Subaru) and search warrant affidavit for 207-837-3761.
2. The arrest warrant affidavit and search warrant affidavits contain several statements made by family members and other individuals who knew the defendant, Robert Card, and provided information to law enforcement.
3. This case has been a high-profile matter with significant media involvement, which is an additional hardship in and of itself for these family members and individuals who knew the defendant, Robert Card.

4. In order to balance the privacy rights of those family members and individuals who provided information to law enforcement and to allow the dissemination of information contained within the arrest warrant affidavit at CR- 23-3004 and the search warrant affidavits at SW-23-163 (1007 West Road, Bath), SW-23-165 (White Subaru) and search warrant affidavit for 207-837-3761 the State moves to redact the full name of family members and those individuals who provided information to law enforcement and replace their full names with only the first initial of the first and last name. See attached redacted Arrest Warrant Affidavit and Search Warrant Affidavits.
5. The purpose of these redactions is not to redact any substantive information from the Affidavits. Rather, the purpose is to protect the privacy rights of the family of Robert Card and individuals who knew Robert Card, who assisted law enforcement.

WHEREFORE, the State of Maine by and through its attorney, moves this Honorable Court to redact portions of the arrest warrant affidavit at CR-23-3004 and the search warrant affidavits at SW-23-163 (1007 West Road, Bath), SW-23-165 (White Subaru) and search warrant affidavit for 207-837-3761 before allowing for its release from impoundment.

Dated: October 31, 2023

Respectfully submitted,



Leane Zainea  
Assistant Attorney General  
Department of the Attorney General  
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Maine State Bar No. 3707

FILED VIA SHAREFILE

STATE OF MAINE  
ANDROSCOGGIN, SS

UNIFIED CRIMINAL DOCKET  
LEWISTON  
DOCKET NO. ANDCD-CR- 23-3004  
SW-23-163/165/SW-23-\_\_\_\_\_

STATE OF MAINE	)	
	)	
	)	
	)	
v.	)	ORDER ON MOTION TO REDACT
	)	AFFIDAVIT FOR WARRANT OF
	)	ARREST and SEARCH WARRANTS
	)	AFFIDAVITS AT SW-23-163 (1007 West
ROBERT CARD	)	Road, Bath), SW-23-165 (White Subaru)
Defendant	)	and SEARCH WARRANT AFFIDAVIT
	)	for 207-837-3761

The State of Maine’s Motion to Redact Affidavit for Warrant of Arrest at CR-23-3004 and Search Warrants Affidavits at SW-23-163 (1007 West Road, Bath), SW-23-165 (White Subaru) and search warrant affidavit for 207-837-3761 before allowing for its release from impoundment are hereby granted.

Dated:

\_\_\_\_\_  
JUSTICE