

AARON M. FREY  
ATTORNEY GENERAL



STATE OF MAINE  
OFFICE OF THE ATTORNEY GENERAL  
6 STATE HOUSE STATION  
AUGUSTA, MAINE 04333-0006

TEL: (207) 626-8800  
TTY USERS CALL MAINE RELAY 711

REGIONAL OFFICES  
84 HARLOW ST. 2ND FLOOR  
BANGOR, MAINE 04401  
TEL: (207) 941-3070  
FAX: (207) 941-3075

125 PRESUMPSCOT ST., SUITE 26  
PORTLAND, MAINE 04103  
TEL: (207) 822-0260  
FAX: (207) 822-0259

14 ACCESS HIGHWAY, STE. 1  
CARIBOU, MAINE 04736  
TEL: (207) 496-3792  
FAX: (207) 496-3291

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 Unimpond Complaint and Affidavit in Support of Probable Cause and Arrest Warrant at CR-23-3004 and Search Warrant Affidavits at SW-23-163, SW-23-165 and Search Warrant Affidavit for 207-837-3761 regarding 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', written over a circular stamp.

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-\_\_\_\_\_

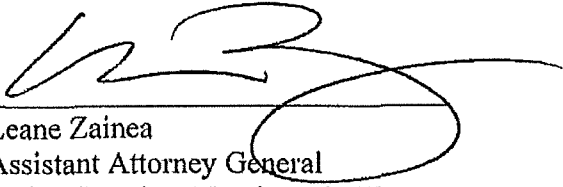
STATE OF MAINE	)	
	)	
	)	MOTION TO UNIMPOUND COMPLAINT
	)	AND AFFIDAVIT IN SUPPORT OF
v.	)	PROBABLE CAUSE AND ARREST WARRANT
	)	at CR-23-3004 AND SEARCH WARRANT AND
	)	AFFIDAVIT IN SUPPORT OF PROBABLE
ROBERT CARD	)	CAUSE for SW-23-163 (1007 West Road, Bath),
	)	SW-23-165 (White Subaru) and SEARCH
	)	WARRANT AND AFFIDAVIT for 207-837-3761

NOW COMES the State of Maine, by and through its attorney, Leane Zainea, Assistant Attorney General and respectfully requests this Honorable Court to order the un-impoundment of the complaint, affidavit in support of probable cause and arrest warrant and the search warrants and affidavits in support of probable cause at SW-23-163 (1007 West Road, Bath), SW-23-165 (White Subaru) and search warrant affidavit for 207-837-3761 submitted in connection with the above matters for the following reason:

1. The Court granted the State's Motion to Impound the complaint, affidavit in support of probable cause and arrest warrant in the above captioned matter and the search warrants and affidavits in support of probable cause at SW-23-163 (1007 West Road, Bath), SW-23-165 (White Subaru) and search warrant affidavit for 207-837-3761. Since the Court's Impoundment Order the defendant, Robert Card, has died.
2. The continued impoundment of the complaint, affidavit in support of probable cause and arrest warrant and the search warrants and affidavits in support of probable cause at SW-23-163 (1007 West Road, Bath), SW-23-165 (White Subaru) and search warrant affidavit for 207-837-3761 is no longer necessary because there will not be an arrest or prosecution of Robert Card.

WHEREFORE, the State of Maine respectfully requests that this Honorable Court unimpound this motion, proposed Order, Complaint and Affidavit in Support of Probable Cause in the above-captioned matter.

Dated: October 31, 2023



Leane Zainea  
Assistant Attorney General  
Maine State Bar Number: 3707  
Office of the Attorney General  
Criminal Division  
6 State House Station  
Augusta, ME 04333-0006  
(207) 626-8800

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	)	
	)	
	)	ORDER ON MOTION TO UNIMPOUND COMPLAINT
	)	AND AFFIDAVIT IN SUPPORT OF
v.	)	PROBABLE CAUSE AND ARREST WARRANT
	)	at CR-23-3004 AND SEARCH WARRANT AND
	)	AFFIDAVIT IN SUPPORT OF PROBABLE
ROBERT CARD	)	CAUSE for SW-23-163 (1007 West Road, Bath),
	)	SW-23-165 (White Subaru) and SEARCH WARRANT
	)	AFFIDAVIT for 207-837-3761

The State of Maine's Motion to Unimpond Complaint and Affidavit in Support of Probable Cause and Arrest Warrant and the search warrants and affidavits in support of probable cause at SW-23-163 (1007 West Road, Bath), SW-23-165 (White Subaru) and search warrant affidavit for 207-837-3761 is hereby granted. The Clerk shall unimpond the Complaint and Affidavit in Support of Probable Cause and Arrest Warrant and the Search Warrants and Affidavits in Support of Probable cause at SW-23-163 (1007 West Road, Bath), SW-23-165 (White Subaru) and search warrant affidavit for 207-837-3761.

Dated:

\_\_\_\_\_  
JUSTICE