

MATTHEW J. PLATKIN  
ATTORNEY GENERAL OF NEW JERSEY

By: Michael D. Grillo, Assistant Attorney General (Attorney I.D. 037892009)  
Office of Public Integrity and Accountability  
Office of Public Integrity & Accountability  
P.O. Box 085  
Trenton, N.J. 08625-0085

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STATE OF NEW JERSEY,

Plaintiff,

v.

GEORGE E. NORCROSS, III,  
PHILIP A. NORCROSS,  
WILLIAM M. TAMBUSI,  
DANA L. REDD,  
SIDNEY R. BROWN, and  
JOHN J. O'DONNELL,

Defendants.

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SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION, CRIMINAL PART  
MERCER COUNTY

INDICTMENT NO. 24-06-00111-S  
PROMIS/GAVEL NO. MER-24-001988

CRIMINAL ACTION

INTERIM CONSENT PROTECTIVE ORDER  
REGARDING DISCOVERY

**THIS MATTER** having been brought before the Court pursuant to R. 3:13-3(e) by the State of New Jersey, Assistant Attorney General Michael D. Grillo appearing on behalf of the State, for the entry of a Consent Protective Order Regarding the State's Discovery in the above-captioned matter; and the Defendants (Michael Critchley, Esq. appearing on behalf of the defendant, George E. Norcross, III; Kevin Marino, Esq. appearing on behalf of the defendant, Philip A. Norcross; Lee Vartan, Esq. appearing on behalf of the defendant, William M. Tambussi; Henry Klingeman, Esq. appearing on behalf of the defendant, Dana L. Redd; Lawrence S. Lustberg, Esq. appearing on behalf of the defendant, Sidney R. Brown; Gerald Krovatin, Esq. appearing on behalf of the defendant, John J. O'Donnell); and pending agreement to or a Court decision on a Final Protective Order which more specifically delineates the categories of confidential information to which it applies; and the parties and counsel for the parties having consented to the form and entry of this Order, and for other good

cause shown;

IT IS on this 6<sup>th</sup> day of November, 2024,

**ORDERED** as follows:

1. The State's motion pursuant to R. 3:13-3(e) for the issuance of a Consent Order regarding discovery in the above-captioned case is hereby **GRANTED**.

2. The State shall provide an unredacted copy of the State's discovery in the above-captioned matter to defense counsel; likewise, the Defendants will provide unredacted copies of any applicable defense discovery to the State.

3. This Interim Consent Protective Order ("Order") does not apply to information or records that are publicly available independent of the State's productions, nor does it apply to information or records which the Defendants or defense counsel came to possess by independent means, unrelated to the discovery process.

4. Counsel and the parties shall not copy, reproduce, duplicate, or otherwise disclose the discovery to any third party except as otherwise authorized by this Order.

5. Counsel for both parties may copy, reproduce, duplicate, image, and index the discovery for their use in the litigation of this matter.

6. Counsel for both parties may disclose or provide a copy of the discovery only to the following persons (referred to herein as "Designated Persons"):

- Investigative, secretarial, clerical, paralegal, and student personnel employed full-time or part-time by such counsel;
- Expert witnesses, investigators, advisors, consultants and vendors retained or consulted by the parties and/or their counsel in connection with this action;
- Prospective witnesses, and their counsel, to the extent deemed necessary by

counsel, for the purposes of the criminal proceedings in this case; and

- Such other persons who are essential to the litigation or the development of the litigation strategy of this case.

Nothing in this Order shall preclude the use of these such discovery by either party for us as Exhibits at trial or in connection with pretrial motions filed with the Court.

7. If such a disclosure or copy of the discovery is made, the Designated Persons to whom a disclosure or copy of the discovery is provided is also bound by the terms of this Order and, accordingly, counsel shall also provide a copy of this Order upon such Designated Persons before the disclosure or copy of the discovery is provided to that Designated Persons. Said Designated Persons shall not copy, reproduce, duplicate, or otherwise disclose the discovery. If a copy of the discovery is provided to the Designated Persons, the copy of the discovery must be returned to counsel at the conclusion of the litigation of the above-captioned matter. Counsel for both parties shall take reasonable measures to ensure that the copy of the discovery provided pursuant to this paragraph is returned to counsel, including, but not limited to, notifying the Court and the pertinent party within a reasonable time of any failure to return such discovery as required.

8. All persons who have been granted access under this Order to the Confidential Personal Identifiers and other materials contained in the discovery shall not use, copy, reproduce, duplicate, or otherwise disclose the Confidential Personal Identifiers and other confidential materials produced in discovery for any purpose not directly related to the litigation of the above-captioned matter without leave of the Court. Such an unauthorized use or disclosure may result in Contempt of Court or other appropriate proceedings for violation of this Order.

9. Upon the conclusion of this matter, counsel shall: (a) return the discovery and all copies thereof to the State or the applicable Defendant, as the case may be; (b) destroy all copies of the discovery; or (c) maintain all copies of the discovery in such a manner as to prevent unauthorized

disclosure.

10. Either side may move to relax or modify this Order, or for such other relief as may apply, for good cause shown on ten days' notice to the Court and the State.


11. The interim Consent Orders titled "Consent Protective Order Regarding the State's Discovery" entered on or about July 9, 2024 and August 7, 2024, as well as the interim Consent Order titled "Interim Consent Protective Order Regarding Discovery" entered on or about September 20, 2024, are hereby vacated.

12. If not previously vacated, this Order shall expire on January 22, 2025.

  
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HON. PETER E. WARSHAW, JR., P.J. Cr.

We hereby consent to the form and entry of this above Order:

MATTHEW J. PLATKIN  
ATTORNEY GENERAL OF NEW JERSEY

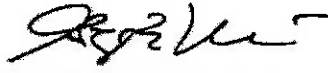
By:   
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Michael D. Grillo  
Assistant Attorney General

Date: October 28, 2024

CRITCHLEY, KINUM & LURIA, LLC  
COUNSEL FOR GEORGE E. NORCROSS, III

By:   
Michael Critchley, Esq.

Date: 11/5/24

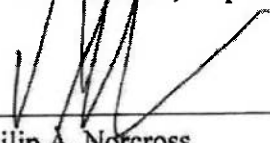
  
George E. Norcross, III

Date: 10/28/24

MARINO, TORTORELLA & BOYLE, P.C.  
COUNSEL FOR PHILIP A. NORCROSS

By:   
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Kevin H. Marino, Esq.

Date: October 30, 2024

  
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Philip A. Norcross

Date: 10/31/24

CHIESA, SHAHINIAN & GIANTOMASI, P.C.  
COUNSEL FOR WILLIAM M. TAMBUSSI

By: Lee Vartan  
Lee Vartan, Esq.

Date: October 28, 2024

William M. Tambussi  
William M. Tambussi

Date: October 28, 2024

KLINGEMAN CERIMELE  
COUNSEL FOR DANA L. REDD

By:   
Henry Klingeman, Esq.


Date: 10/29/2024

  
Dana L. Redd (DC) 29, 2024 11:28:10 AM  
Dana L. Redd


Date: 29/10/24



GIBBONS, P.C.  
COUNSEL FOR SIDNEY R. BROWN

By:   
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Lawrence Lustberg, Esq.

Date: 10/30/2024

  
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Sidney R. Brown

Date: 11/1/2024

KROVATIN NAU, LLC  
COUNSEL FOR JOHN J. O'DONNELL

By:   
Gerald Krovatin, Esq.

Date: 10/29/24

  
John J. O'Donnell

Date: 10/29/24