

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PENNSYLVANIA

COMMONWEALTH OF PENNSYLVANIA

VS.

STANLEY EUGENE WEST

CRIMINAL DIVISION

CP-02-MD-10416-2025

COMMONWEALTH'S PETITION FOR
NON-DISCLOSURE ORDER

Judge Edward J. Borkowski
Criminal Division Motions Judge

Filed on Behalf of the
Commonwealth of Pennsylvania

Counsel of Record for the
Commonwealth of Pennsylvania

STEPHEN A. ZAPPALA, JR.
DISTRICT ATTORNEY

By

Emma E. Schoedel
Deputy District Attorney
PA ID. No. 320534

Ryan S. Kiray
Deputy District Attorney
PA ID. No. 316718

Jennifer A. Berosh
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DEPT. OF COURT RECORDS
CRIMINAL DIVISION
ALLEGHENY COUNTY PA

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AND NOW, comes the Commonwealth of Pennsylvania, by and through its attorneys, STEPHEN A. ZAPPALA, JR., District Attorney of Allegheny County, Pennsylvania, and Emma E. Schoedel, Ryan S. Kiray, and Jennifer A. Berosh, Deputy District Attorneys, and files this Petition for Non-Disclosure Order and, in support thereof, hereby avers as follows:

1. The above-captioned matter is currently docketed at Pittsburgh Municipal Court at Offense Tracking Number R 863500-1 and is awaiting preliminary arraignment.
2. Defendant Stanley Eugene West (hereinafter "the Defendant") is charged with one count each of Criminal Homicide, brought pursuant to 18 Pa.C.S. § 2501, Criminal Attempt-Criminal Homicide, brought pursuant to 18 Pa.C.S. § 901 and 18 Pa.C.S. § 2501, and Recklessly Endangering Another Person, brought pursuant to 18 Pa.C.S. § 2705.
3. It is alleged, *inter alia*, that on October 3, 2025, the Defendant shot and killed Rakesh Bhagavan and shot and critically injured a second victim in Robinson Township.
4. During investigation of the above-captioned matter, video was obtained from the surveillance system located at the scene of the alleged incident.
5. Surveillance video of the incident has since begun circulating on the Internet website Instagram as well as traditional media outlets.
6. As of the time of this writing, the video has been "liked" by users over 18,000 times and "shared" nearly 27,000 times.

7. The video graphically depicts the shooting of Rakesh Bhagavan from point-blank range, with the camera situated in close proximity to the shooting.
8. The origin of the dissemination of this video is currently unknown.
9. The widespread nature of the dissemination of this surveillance video, if allowed to continue, poses a risk of interfering with the rights of the accused to a fair and impartial trial.
10. Pursuant to Rules 110 and 111 of the Rules of Criminal Procedure, the Commonwealth respectfully requests that this Honorable Court enter an Order barring statements by parties, witnesses and potential witnesses, and court personnel from the making of any extrajudicial statement regarding this matter that poses a risk of materially prejudicing an adjudicative proceeding, as well as from disseminating any evidence that may be in the individuals' possession that has not been duly entered into evidence and made a part of the public record.
11. The Commonwealth further requests that the Court impose appropriate sanctions upon any bound party that violates this order.
12. It is noted that, at this time, no counsel has been appointed to the Defendant, nor has any counsel entered an appearance on his behalf; the Commonwealth requests that this Order bind any future counsel.

WHEREFORE, the Commonwealth respectfully requests that this Honorable Court enter an order restricting extrajudicial statements or dissemination of evidence in a manner that may materially prejudice any adjudicative proceeding in this matter.

Respectfully submitted,

STEPHEN A. ZAPPALA, JR.
DISTRICT ATTORNEY

By: /s/ Emma Schoedel
Emma E. Schoedel
Deputy District Attorney

/s/ Ryan Kiray
Ryan S. Kiray
Deputy District Attorney

/s/ Jennifer Berosh
Jennifer A. Berosh
Deputy District Attorney

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PENNSYLVANIA
COMMONWEALTH OF PENNSYLVANIA CRIMINAL DIVISION

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CP-02-MD-

STANLEY EUGENE WEST

ORDER OF COURT

AND NOW, this _____ day of _____, 2025, it is hereby
ORDERED, ADJUDGED, and DECREED that a hearing will be held on the Commonwealth's
Petition for Non-Disclosure Order filed in the above-captioned matter on _____
_____, 2025, before the undersigned.

By the Court,

_____, J.

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PENNSYLVANIA
COMMONWEALTH OF PENNSYLVANIA CRIMINAL DIVISION

VS.

CP-02-MD-

STANLEY EUGENE WEST

ORDER OF COURT

AND NOW, this _____ day of _____, 2025, upon consideration of the Commonwealth's Petition for Non-Disclosure Order, it is hereby ORDERED, ADJUDGED, and DECREED, pursuant to Rules 110 and 111 of the Rules of Criminal Procedure, that:

1. The parties to this case, including the Commonwealth, the Defendant, and any counsel, past, present, or future, for the same, are hereby PROHIBITED from making extrajudicial statements, or directing others to make any statements, that such person knows or reasonably should know will be disseminated by means of public communication and will have a substantial likelihood of materially prejudicing an adjudicative proceeding in this matter.
2. Dissemination by public communication includes disclosure of information by traditional media outlets as well as through online websites and social media platforms.
3. Public communication in this context will explicitly include the dissemination of any video, exhibit, or other piece of evidence that has not been made a part of the record at any proceeding held in this matter.
4. Counsel and any person employed in the law firm or public office that employs any counsel for any party in this matter are ORDERED to comply with Pennsylvania Rule of Professional Conduct 3.6 which provides:

- (a) A lawyer who is participating or has participated in the investigation or litigation of a matter shall not make an extrajudicial statement that the lawyer knows or reasonably should know will be disseminated by means of public communication and will have a substantial likelihood of materially prejudicing an adjudicative proceeding in the matter.
 - (b) Notwithstanding paragraph (a), a lawyer may state:
 - a. the claim, offense or defense involved and, except when prohibited by law, the identity of the persons involved;
 - b. information contained in a public record;
 - c. that an investigation of the matter is in progress;
 - d. the scheduling or result of any step in litigation;
 - e. a request for assistance in obtaining evidence and information necessary thereto;
 - f. a warning of danger concerning the behavior of a person involved, when there is reason to believe that there exists the likelihood of substantial harm to an individual or to the public interest; and
 - g. in a criminal case, in addition to subparagraphs (1) through (6):
 - i. the identity, residence, occupation and family status of the accused;
 - ii. if the accused has not been apprehended, information necessary to aid in apprehension of that person;
 - iii. the fact, time and place of arrest; and
 - iv. the identity of investigating and arresting officers or agencies and the length of the investigation.
 - (c) Notwithstanding paragraph (a), a lawyer may make a statement that a reasonable lawyer would believe is required to protect a client from the substantial undue prejudicial effect of recent publicity not initiated by the lawyer or the lawyer's client. A statement made pursuant to this paragraph shall be limited to such information as is necessary to mitigate the recent adverse publicity.
 - (d) No lawyer associated in a firm or government agency with a lawyer subject to paragraph (a) shall make a statement prohibited by paragraph (a).
5. This order shall apply in equal measure to any witnesses or potential witnesses in this case; counsel for both parties shall advise any witness of this Order, including, but not limited to, investigators, law enforcement personnel, video and/or records custodians,

and any other person known to counsel to be involved in, or associated with, the litigation of this action.

6. All law enforcement personnel and employees, including, but not limited to, employees of the Robinson Township Police, Pittsburgh Police, Allegheny County Police, Pennsylvania State Police, Allegheny County Jail, and any other investigating agency who are directly or indirectly involved in the investigation or prosecution of this matter are further bound as described above and shall be informed of the same by the Allegheny County District Attorney's Office.
7. All Court personnel, as defined by Pa.R.Crim.P. 111 are further prohibited as delineated above.

By the Court,

_____, J.

CERTIFICATE OF COMPLIANCE

I hereby certify that this filing complies with the provisions of the *Case Records Public Access Policy of the Unified Judicial System of Pennsylvania* that require filing confidential information and documents differently than non-confidential information and documents.

/s/ Emma Schoedel
Emma E. Schoedel
Deputy District Attorney

/s/ Ryan Kiray
Ryan S. Kiray
Deputy District Attorney

/s/ Jennifer Berosh
Jennifer A. Berosh
Deputy District Attorney

10/8/2025
Date

VERIFICATION

We, the undersigned, do hereby declare that the statements of fact set forth in the foregoing motion are true and correct to the best of my knowledge, information and belief and are made subject to the penalties related to unsworn falsification to authorities under Section 4904 of the Pennsylvania Crimes Code, 18 Pa. C.S. § 4904.

/s/ Emma Schoedel
Emma E. Schoedel
Deputy District Attorney

/s/ Ryan Kiray
Ryan S. Kiray
Deputy District Attorney

/s/ Jennifer Berosh
Jennifer A. Berosh
Deputy District Attorney

10/8/2025
Date

CERTIFICATE OF SERVICE

I, Ryan S. Kiray, the undersigned, do hereby certify that on this 8th day of October, 2025, I have caused to be served upon the persons listed below a true and correct copy of the within Motion.

Service by hand delivery:

Stanley Eugene West

Service by electronic delivery:

Janice Radovick Dean, Esq.
Criminal Court Administrator
535 County Courthouse
Pittsburgh, PA 15219

The Honorable Edward J. Borkowski
Room 514 Courthouse
Pittsburgh, PA 15219

/s/ Ryan Kiray
Ryan S. Kiray
Deputy District Attorney