

FILED WITH THE
COURT SECURITY OFFICER
CSO:
DATE:

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA**

Alexandria Division

UNITED STATES OF AMERICA, vs. JEFFREY ALEXANDER STERLING, Defendant.))))))))))	Case No. 1:10-cr-00485-LMB
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SECOND CIPA § 5 FILING BY JEFFREY A. STERLING

Defendant Jeffrey Sterling ("Mr. Sterling"), by and through counsel, and pursuant to The Classified Information Procedures Act ("CIPA"), 18 U.S.C. App. 3 § 5 (a), hereby gives notice of his intention to disclose the following classified information in connection with the trial or pre-trial proceedings in this case. The defendant submits that he reasonably expects to disclose this information as part of the investigation of the case, and as part of the trial of this case. It is also submitted that this information will need to be disclosed by the defendant or his counsel as part of the pretrial investigation seeking exculpatory information.

Pursuant to CIPA § 6 (f), Mr. Sterling hereby requests that the United States provide reciprocal discovery of each and every item of information it intends to use to rebut any of the classified information identified in this notice and which the Court orders may be disclosed at trial or any pretrial proceeding.

The subject documents are listed below. For the Court's convenience, attached hereto are copies of the documents that are the subject of this Notice:

- 80. FBI 302 of William F_____ dated March 17, 2006 (F00033 - F00040) and the information and statements contained therein.

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81. FBI 302 of David S _____ dated May 12, 2006 (F00178 - F00182) and the information and statements contained therein.
82. FBI 302 of Robert S _____ dated June 26, 2003 (F00187 - F00192) and the information and statements contained therein.
83. FBI 302 of Bill H _____ dated April 14, 2003 (F00241 - F00244) and the information and statements contained therein.
84. FBI 302 of Jeffrey Sterling dated June 19, 2003 (F00246 - F00257) and the information and statements contained therein.
85. FBI 302 of Jeffrey Sterling dated June 23, 2006 (F00258 - F00260) and the information and statements contained therein.
86. FBI 302 of _____ dated April 12, 2003 (F00261) and the information and statements contained therein.
87. FBI 302 of Vicki Divoll dated October 10, 2004 (F00262 - F00268) and the information and statements contained therein.
88. FBI 302 of Lorenzo Goco dated November 14, 2005 (F00269 - F00270) and the information and statements contained therein.
89. FBI 302 of Condoleezza Rice dated April 17, 2006 (F00271 - F00275) and the information and statements contained therein.
90. FBI 302 of Donald C. Stone dated November 28, 2005 (F00276 - F00279) and the information and statements contained therein.
91. FBI 302 of Mark Zaid dated April 18, 2003 (F00280 - F00283) and the information and statements contained therein.
92. FBI 302 of _____ dated October 14, 2010 (F00284 - F00285) and the information and statements contained therein.
93. FBI 302 of Vicki Divoll dated October 12, 2010 (F00286 - F00290) and the information and statements contained therein.

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94. FBI 302 of Robert E____ dated October 12, 2010 (F00291 - F00292) and the information and statements contained therein.
95. FBI 302 of Lorenzo Goco dated July 26, 2010 (F00293 - F00295) and the information and statements contained therein.
96. FBI 302 of William (Bill) H____ dated May 13, 2010 (F00296 - F00301) and the information and statements contained therein.
97. FBI 302 of _____ dated September 14, 2010 (F00302) and the information and statements contained therein.
98. FBI 302 of Wyndee Parker dated October 6, 2010 (F00303 - F00308) and the information and statements contained therein.
99. FBI 302 of Anna Perez dated April 9, 2008 (F00309 - F00311) and the information and statements contained therein.
100. FBI 302 of Michael Sheehy dated October 13, 2010 (F00312 - F00314) and the information and statements contained therein.
101. FBI 302 of Robert S____ dated July 28, 2010 (F00315 - F00320) and the information and statements contained therein.
102. FBI 302 of Donald Stone dated May 27, 2010 (F00321 - F00322) and the information and statements contained therein.
103. FBI 302 of _____ dated September 16, 2010 (F00325 - F00326) and the information and statements contained therein.
104. FBI 302 of Mark Zaid dated September 1, 2010 (F00327 - F00329) and the information and statements contained therein.

Dated: April 6, 2011

JEFFREY A. STERLING
By counsel

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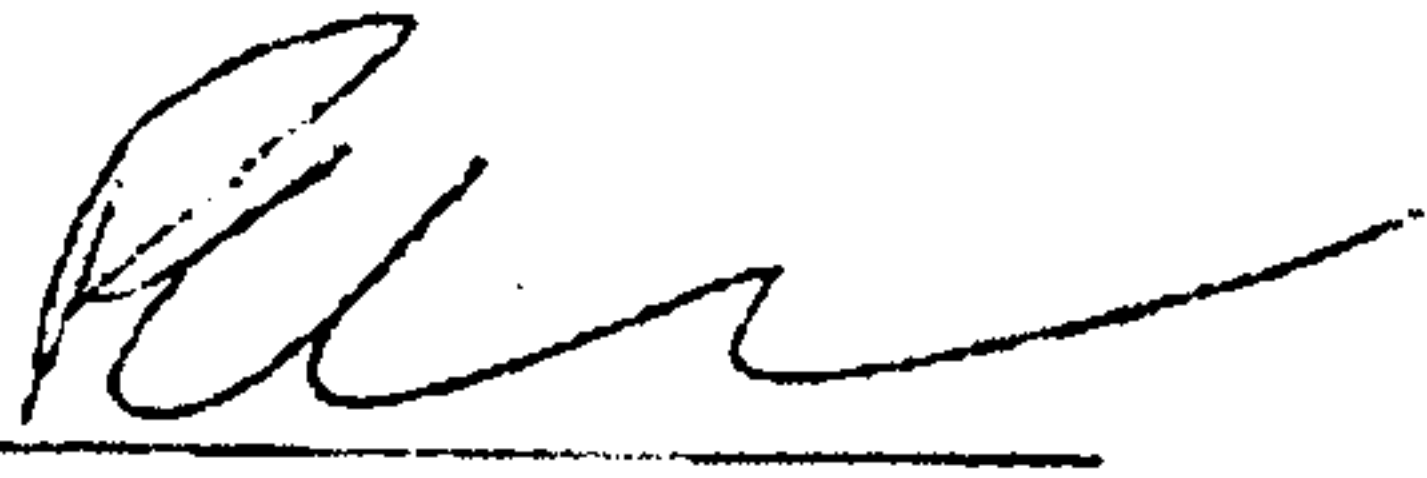
Counsel for Jeffrey A. Sterling

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CERTIFICATE OF SERVICE

I hereby certify that on April the 6th, 2011, I delivered an original of the following
Second CIPA § 5 Filing by Jeffrey Sterling to the CISO as directed by the Classified Information
Protective Order issued in this case.

By: 
Edward B. MacMahon, Jr. (VSB #25432)

Counsel for Jeffrey A. Sterling

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