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

FILED WITH THE
COURT SECURITY OFFICER
CSO:
DATE:

Alexandria Division

UNITED STATES OF AMERICA,

vs.

JEFFREY ALEXANDER STERLING,

Defendant.

Case No. 1:10-cr-00485-LMB

FIRST 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:

1. FBI 302 of Stephen B____ dated April 12, 2006 (F00002 - F00005) and the information and statements contained therein.

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2. FBI 302 of David C ___ dated August 1, 2003 (F00007 - F00008) and the information and statements contained therein.
3. FBI 302 of [REDACTED] dated July 21, 2006 (F00010 - F00012) and the information and statements contained therein.
4. FBI 302 of [REDACTED] dated September 4, 2007 (F00014 - F00018) and the information and statements contained therein.
5. FBI 302 of Laurie D ___ dated April 4, 2006 (F00020 - F00022) and the information and statements contained therein.
6. FBI 302 of Robert J. E ___ dated April 12, 2003 (F00024 - F00025) and the information and statements contained therein.
7. FBI 302 of [REDACTED] dated August 13, 2003 (F00027 - F00031) and the information and statements contained therein.
8. FBI 302 of [REDACTED] dated May 2, 2006 (F00042 - F00045) and the information and statements contained therein.
9. FBI 302 of Diane F ___ dated August 14, 2003 (F00047 - F00049) and the information and statements contained therein.
10. FBI 302 of [REDACTED] dated May 02, 2006 (F00051 - F00053) and the information and statements contained therein.
11. FBI 302 of Leonard G ___ dated May 11, 2006 (F00055 - F00059) and the information and statements contained therein.
12. FBI 302 of [REDACTED] dated July 18, 2003 (F00061 - F00065) and the information and statements contained therein.
13. FBI 302 of William (Bill) H ___ dated April 28, 2003 (F00067 - F00069) and the information and statements contained therein.
14. FBI 302 of Thomas H ___ dated July 21, 2003 (F00071 - F00073) and the information and statements contained therein.
15. FBI 302 of [REDACTED] dated August 13, 2003 (F00075 - F00078) and the information and statements contained therein.

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16. FBI 302 of [REDACTED] dated July 27, 2006 (F00080 - F00081) and the information and statements contained therein.
17. FBI 302 of Mark L. [REDACTED] dated August 13, 2006 (F00083 - F00085) and the information and statements contained therein.
18. FBI 302 of [REDACTED] dated November 23, 2007 (F00087 - F00096) and the information and statements contained therein.
19. FBI 302 of Carrie L. [REDACTED] dated August 11, 2006 (F00098 - F00103) and the information and statements contained therein.
20. FBI 302 of Dennis M. [REDACTED] dated March 14, 2006 (F00105 - F00108) and the information and statements contained therein.
21. FBI 302 of [REDACTED] dated December 14, 2007 (F00110 - F00118) and the information and statements contained therein.
22. FBI 302 of [REDACTED] dated July 25, 2007 (F00120 - F00122) and the information and statements contained therein.
23. FBI 302 of [REDACTED] dated March 13, 2006 (F00124 - F00131) and the information and statements contained therein.
24. FBI 302 of [REDACTED] dated March 11, 2008 (F00133 - F00134) and the information and statements contained therein.
25. FBI 302 of [REDACTED] dated June 09, 2010 (F00136 - F00144) and the information and statements contained therein.
26. FBI 302 of [REDACTED] dated April 13, 2003 (F00146 - F00148) and the information and statements contained therein.
27. FBI 302 of [REDACTED] dated May 7, 2003 (F00150 - F00151) and the information and statements contained therein.
28. FBI 302 of [REDACTED] dated May 9, 2003 (F00153 - F00154) and the information and statements contained therein.
29. FBI 302 of [REDACTED] dated August 19, 2010 (F00156 - F00161) and the information and statements contained therein.

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30. FBI 302 of [REDACTED] dated February 16, 2007 (F00163 - F00164) and the information and statements contained therein.
31. FBI 302 of [REDACTED] dated June 12, 2006 (F00166 - F00171) and the information and statements contained therein.
32. FBI 302 of Gayle S [REDACTED] dated August 19, 2010 (F00173 - F00176) and the information and statements contained therein.
33. FBI 302 of Robert S [REDACTED] dated April 12, 2003 (F00184 - F00185) and the information and statements contained therein.
34. FBI 302 of [REDACTED] dated February 29, 2008 (F00213 - F00214) and the information and statements contained therein.
35. FBI 302 of [REDACTED] dated March 16, 2006 (F00216 - F00218) and the information and statements contained therein.
36. FBI 302 of [REDACTED] dated February 27, 2007 (F00225 - F00226) and the information and statements contained therein.
37. FBI 302 of Zachary W [REDACTED] dated March 13, 2006 (F00228 - F00234) and the information and statements contained therein.
38. FBI 302 of Stephen [REDACTED] Y [REDACTED] dated March 13, 2006 (F00236 - F00239) and the information and statements contained therein.
39. CIA Cable [REDACTED] dated [REDACTED] (C00002 - C00003) and the information and statements contained therein.
40. CIA Cable [REDACTED] dated [REDACTED] (C00005 - C00006) and the information and statements contained therein.
41. CIA Cable [REDACTED] dated [REDACTED] (C00008 - C00009) and the information and statements contained therein.
42. CIA Cable [REDACTED] dated [REDACTED] (C00011) and the information and statements contained therein.
43. CIA Cable [REDACTED] dated [REDACTED] (C00013 - C00014) and the information and statements contained therein.

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- 44. CIA [redacted] Cable [redacted] dated [redacted] (C00016 - C00017) and the information and statements contained therein.
- 45. CIA [redacted] Cable [redacted] dated [redacted] (C00019) and the information and statements contained therein.
- 46. CIA [redacted] Cable [redacted] dated [redacted] (C00021) and the information and statements contained therein.
- 47. CIA [redacted] Cable [redacted] dated [redacted] (C00023 - C00024) and the information and statements contained therein.
- 48. CIA [redacted] Cable [redacted] dated [redacted] (C00026 - C00027) and the information and statements contained therein.
- 49. CIA [redacted] Cable [redacted] dated [redacted] (C00029 - C00030) and the information and statements contained therein.
- 50. CIA [redacted] Cable [redacted] dated [redacted] (C00032 - C00033) and the information and statements contained therein.
- 51. CIA [redacted] Cable [redacted] dated [redacted] (C00035 - C00037) and the information and statements contained therein.
- 52. CIA [redacted] Cable [redacted] dated [redacted] (C00039 - C00042) and the information and statements contained therein.
- 53. CIA [redacted] Cable [redacted] dated [redacted] (C00047 - C00048) and the information and statements contained therein.
- 54. CIA [redacted] Cable [redacted] dated [redacted] (C00053 - C00054) and the information and statements contained therein.
- 55. CIA [redacted] Cable [redacted] dated [redacted] (C00056 - C00058) and the information and statements contained therein.
- 56. CIA [redacted] Cable [redacted] dated [redacted] (C00060) and the information and statements contained therein.
- 57. CIA [redacted] Cable [redacted] dated [redacted] (C00062 - C00063) and the information and statements contained therein.

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- 58. CIA Cable [redacted] dated [redacted] (C00065 - C00067) and the information and statements contained therein.
- 59. CIA Cable [redacted] dated [redacted] (C00069 - C00070) and the information and statements contained therein.
- 60. CIA Cable [redacted] dated [redacted] (C00072 - C00073) and the information and statements contained therein.
- 61. CIA Cable [redacted] dated [redacted] (C00075 - C00076) and the information and statements contained therein.
- 62. CIA Cable [redacted] dated [redacted] (C00078 - C00079) and the information and statements contained therein.
- 63. CIA Cable [redacted] dated [redacted] (C00081 - C00082) and the information and statements contained therein.
- 64. CIA Cable [redacted] dated [redacted] (C00084 - C00085) and the information and statements contained therein.
- 65. CIA Cable [redacted] dated [redacted] (C00087 - C00088) and the information and statements contained therein.
- 66. CIA Cable [redacted] dated [redacted] (C00090 - C00091) and the information and statements contained therein.
- 67. CIA Cable [redacted] dated [redacted] (C00093 - C00094) and the information and statements contained therein.
- 68. CIA Cable [redacted] dated [redacted] (C00096 - C00097) and the information and statements contained therein.
- 69. CIA Cable [redacted] dated [redacted] (C00099 - C00101) and the information and statements contained therein.
- 70. CIA Cable [redacted] dated [redacted] (C00103 - C00104) and the information and statements contained therein.
- 71. CIA Cable [redacted] dated [redacted] (C00106 - C00107) and the information and statements contained therein.


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- 72. CIA [redacted] Cable [redacted] dated [redacted] (C00109 - C00110) and the information and statements contained therein.
- 73. CIA [redacted] Cable [redacted] dated [redacted] (C00112 - C00113) and the information and statements contained therein.
- 74. CIA [redacted] Cable [redacted] dated [redacted] (C00115 - C00116) and the information and statements contained therein.
- 75. CIA [redacted] Cable [redacted] dated [redacted] (C00118 - C00119) and the information and statements contained therein.
- 76. CIA [redacted] Cable [redacted] dated [redacted] (C00121 - C00122) and the information and statements contained therein.
- 77. CIA [redacted] Cable [redacted] dated [redacted] (C00124 - C00125) and the information and statements contained therein.
- 78. CIA [redacted] Cable [redacted] dated [redacted] (C00127 - C00129) and the information and statements contained therein.
- 79. CIA [redacted] Cable [redacted] dated [redacted] (C00131 - C00133) and the information and statements contained therein.

Dated: April 1, 2011

JEFFREY A. STERLING
By counsel

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CERTIFICATE OF SERVICE

I hereby certify that on April 1st, 2011 I delivered an original of the following First CIPA § 5 Filing by Jeffrey Sterling to the CISO as directed by the Classified Information Protective Order issued by this case.

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

Counsel for Jeffrey A. Sterling