

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF GEORGIA
AUGUSTA DIVISION

UNITED STATES OF AMERICA

v.

REALITY LEIGH WINNER,

Defendant.

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CR 117-34

**GOVERNMENT’S RESPONSE TO DEFENDANT’S MOTION FOR PRODUCTION OF
JENCKS MATERIAL IN ADVANCE OF TRIAL (DOC. 22)**

COMES NOW the United States of America, by and through James D. Durham, Acting United States Attorney for the Southern District of Georgia, and responds to Defendant Reality Leigh Winner’s Motion for Production of Jencks Material in Advance of Trial (docs. 16, 22) as follows:

The government does not oppose the defendant’s motion insofar as it requests the production of written and recorded witness statements prior to trial. The government will produce the grand jury transcript in this matter on or before July 5, 2017. Other witness statements are currently classified SECRET//NOFORN and are not available for dissemination prior to the issuance of a Protective Order by the Court, the signing of a Memorandum of Understanding by defense counsel, and the appropriate grant of clearance to defense counsel. Once those prophylactic measures are in place and pursuant to any scheduling orders, the government will disclose all witness statements other than those that may be subject to CIPA Section 4 litigation.

CONCLUSION

The Government will timely disclose to the defense, in accordance with CIPA and the Court's scheduling orders, all written and recorded witness statements relevant to the instant case.

Respectfully submitted,

JAMES D. DURHAM
ACTING UNITED STATES ATTORNEY

//s// Jennifer G. Solari

Jennifer G. Solari
Assistant United States Attorney

//s// David C. Aaron

David C. Aaron
Trial Attorney
U. S. Department of Justice
National Security Division

//s// Julie Edelstein

Julie Edelstein
Trial Attorney
U. S. Department of Justice
National Security Division

CERTIFICATE OF SERVICE

This is to certify that I have on this day served all the parties in this case in accordance with the notice of electronic filing ("NEF") which was generated as a result of electronic filing in this Court.

This 30th day of June, 2017.

JAMES D. DURHAM
ACTING UNITED STATES ATTORNEY

//s// Jennifer G. Solari

Jennifer G. Solari
Assistant United States Attorney

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