

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF GEORGIA
AUGUSTA DIVISION

UNITED STATES OF AMERICA

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v.

NO. 1:17-CR-00034

REALITY LEIGH WINNER

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MEMORANDUM OF UNDERSTANDING REGARDING RECEIPT OF
CLASSIFIED INFORMATION

Having familiarized myself with the applicable statutes, regulations, and orders, I understand that I may be the future recipient of information and documents that concern the present and future security of the United States and which belong to the United States, and that such documents and information together with the methods and sources of collecting it are classified by the United States Government. In consideration for the disclosure of classified information and documents:

(1) I agree that I shall never divulge, publish, or reveal either by word, conduct or any other means, such classified documents and information unless specifically authorized in writing to do so by an authorized representative of the United States Government; or as expressly authorized by the Court pursuant to the Classified Information Procedures Act and the Protective Order entered in United States v. Reality Leigh Winner, criminal number 17-34, Southern District of Georgia.

(2) I agree that this Memorandum will remain forever binding on me.

(3) I have received, read, and understand the Protective Order entered by the United States District Court for the Southern District of Georgia on August 3, 2017, in United States v.

Reality Leigh Winner, criminal number 117-34, relating to classified information, and I agree to comply with the provisions thereof.

(4) I understand that any prior contractual obligations that may bind me to continue to protect classified information remain in full force and effect, and are not superseded by this Memorandum of Understanding. Additionally, I understand that this Memorandum of Understanding does not absolve me of any criminal or civil penalties that may otherwise be imposed upon me as a result of my unauthorized disclosure of classified information.

(5) I declare under the penalty of perjury under the laws of the United States that the foregoing is true and correct.

Respectfully submitted,

BY: 
Joe D. Whitley (Bar No. 756150)
Admitted *Pro Hac Vice*

**BAKER, DONELSON, BEARMAN,
CALDWELL & BERKOWITZ, P.C.**
3414 Peachtree Rd., NE Suite 1600
Atlanta, GA 30326
(404) 577-6000
JWhitley@bakerdonelson.com

**ATTORNEY FOR DEFENDANT
REALITY LEIGH WINNER**

CERTIFICATE OF SERVICE

I hereby certify that on October 19, 2017, I electronically filed the foregoing with the Clerk of the Court using the ECF system, which sent notification of such filing to counsel of record for all parties.

/s/Joe D. Whitley
JOE D. WHITLEY

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF GEORGIA
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Respectfully submitted,

BY:



Matthew S. Chester (La. Bar No. 36411)
Admitted *Pro Hac Vice*
**BAKER, DONELSON, BEARMAN,
CALDWELL & BERKOWITZ, P.C.**
201 St. Charles Ave., Suite 3600
New Orleans, LA 70170
(504) 566-5200
Mchester@bakerdonelson.com

**ATTORNEY FOR DEFENDANT
REALITY LEIGH WINNER**

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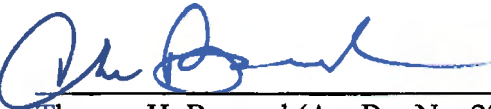
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Respectfully submitted,

BY: 
Thomas H. Barnard (Az. Bar No. 27488)
Admitted *Pro Hac Vice*
**BAKER, DONELSON, BEARMAN,
CALDWELL & BERKOWITZ, P.C.**
100 Light Street.
Baltimore, MD 21202
(410) 685-1120
TBarnard@bakerdonelson.com

**ATTORNEY FOR DEFENDANT
REALITY LEIGH WINNER**

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/s/Joe D. Whitley
JOE D. WHITLEY

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Respectfully submitted,

BY: 
Jill E. McCook (Tn. Bar No. 033813)
Admitted *Pro Hac Vice*
**BAKER, DONELSON, BEARMAN,
CALDWELL & BERKOWITZ, P.C.**
265 Brookview Centre Way, Suite 600
Knoxville, TN 37919
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JMCook@bakerdonelson.com

**ATTORNEY FOR DEFENDANT
REALITY LEIGH WINNER**

CERTIFICATE OF SERVICE

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/s/ Joe D. Whitley
JOE D. WHITLEY

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Respectfully submitted,

BY: 
Holly L. Hampton
**BAKER, DONELSON, BEARMAN,
CALDWELL & BERKOWITZ, P.C.**
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Atlanta, GA 30326
(404) 577-6000
HHampton@bakerdonelson.com

**GOVERNMENT ENFORCEMENT &
INVESTIGATIONS COORDINATOR FOR
DEFENDANT REALITY WINNER**

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