

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

DANIEL RICHMAN,

Petitioner,

v.

UNITED STATES OF AMERICA,

Respondent.

Civil Action No. 25-0170 (CKK)

CERTIFICATION OF COMPLIANCE

The undersigned hereby certifies that the Government has complied with the Court's December 12, 2025, Order as subsequently modified and clarified. ECF Nos. 20, 50 (granting consent motion). The Government:

1. Acknowledges that the definition of "covered materials" comprises the materials identified as "covered materials" in the December 12 Order, including all copies of covered materials, including non-forensic copies, but does not include derivative materials;
2. Has permanently deleted or destroyed any electronic media and forensic images that included the classified memorandum to include the original hard drive obtained from Petitioner's computer;
3. Has permanently deleted a Department of Justice Relativity Database maintained in South Carolina that contained covered materials, as well as any copies or backups of that database that contain Government tagging and coding;
4. Has permanently deleted the two other networked backups containing covered materials that are identified in its [48] Consent Motion;

5. Acknowledges that its obligation to return, delete, or destroy covered materials is limited to covered materials of which the Government is aware and has located;
6. Has returned or permanently deleted and/or destroyed all covered materials of which it is presently aware and has located; and
7. Acknowledges that, if it locates additional covered materials after submitting this certification, the Government and its agents shall:
 - a. Neither access those materials nor share, disseminate, disclose, or transfer them to any person without first seeking and obtaining leave of this Court;
 - b. Promptly notify the Court and Petitioner Richman of this discovery; and
 - c. Seek this Court's leave to either return the materials to Petitioner Richman or delete and destroy them.


The Government also lodged with the Eastern District of Virginia District Court on December 29, 2025, the complete set of covered materials previously in the possession of the Department of Justice's Litigation Security Group; and returned to Petitioner, through counsel, on January 9, 2026, all electronic storage devices constituting or containing Petitioner's original seized materials or forensic copies of those materials, not including those devices that contained the classified memorandum.

Accordingly, the undersigned certifies that the Government has fully complied with the Court's December 12 Order, as subsequently modified and clarified.

[Signature on next page]

Dated: January 28, 2026

Respectfully submitted,



Stanley E. Woodward, Jr. (D.C. Bar. No. 997320)
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*Counsel for Respondent
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CERTIFICATE OF SERVICE

On January 28, 2026, the undersigned hereby certifies that a true and correct copy of the foregoing was electronically filed and served via the CM/ECF system, which will automatically send electronic notification of such filing to all registered parties.

Dated: January 28, 2026

Respectfully submitted,

A handwritten signature in black ink, consisting of a stylized 'S' and 'W' combined, positioned above a horizontal line.

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