



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

May 8, 2023

BY ECF

The Honorable Jennifer H. Rearden
United States District Judge
500 Pearl Street
Southern District of New York
New York, New York 10007

Re: *United States v. Charles McGonigal and Sergey Shestakov*, 23 Cr. 16 (JHR)

Dear Judge Rearden:

At the March 6, 2023 *ex parte* conference held pursuant to Section 2 of the Classified Information Procedures Act ("CIPA") in the above-referenced case, the Government described to the Court certain materials that the Government was seeking to declassify. The Government writes to confirm that those materials have been declassified and produced to the defendants. At this time, the Government does not anticipate making a filing pursuant to Section 4 of CIPA and believes it has met its discovery obligations with respect to classified information.

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney

By: /s/
Rebecca T. Dell
Hagan Scotten
Derek Wikstrom
Assistant United States Attorneys
(212) 637-2198 / 2410 / 1085

Cc: Defense Counsel
Daniella Medel, Classified Information Security Officer