

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

UNITED STATES OF AMERICA,)	
)	
v.)	Case No. 1:21-cr-00245-AJT
)	
IGOR Y. DANCHENKO,)	
)	
Defendant.)	

**DEFENDANT IGOR DANCHENKO’S NOTICE REGARDING
SUPPLEMENTAL CIPA SECTION 5 FILING**

Defendant Igor Danchenko, by and through counsel, hereby provides this notice regarding his supplemental CIPA Section 5 filing. Counsel for Mr. Danchenko and the Special Counsel have continued discussions regarding the use of classified information during the upcoming October trial. Based on those discussions, Mr. Danchenko does not intend to provide further notice of additional classified information that he would reasonably expect to introduce at trial. At the time of this filing, the Special Counsel has produced a portion of the declassified materials that were previously litigated as a result of Mr. Danchenko’s first CIPA Section 5 notice. It is expected that the remaining requested materials will be declassified and produced in time for use at trial.

However, because some materials have not yet been produced and the defense, therefore, has not been able to determine whether the Special Counsel’s proposed summaries and redactions are acceptable, Mr. Danchenko may ask leave of the Court to file a supplemental CIPA Section 5 notice should it become necessary. All parties continue to act in good faith to resolve any classified information issues without the need for intervention by the Court and it is expected that no further litigation will be necessary. Nevertheless, the Special Counsel has informed undersigned counsel that he will not object to the filing of a renewed or supplemental CIPA Section 5 notice should the need for one arise.

CERTIFICATE OF SERVICE

I hereby certify that on the 20th day of September, 2022, I electronically filed a true copy of the foregoing reply with the Clerk of Court using the CM/ECF system, which will send a notification of such filing (NEF) to all parties.

/s/

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