

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

UNITED STATES OF AMERICA :
 : **CRIMINAL NO. 21-cr-506 (TNM)**
 v. :
 :
ANDREW C. ERICSON, :
 :
 Defendant. :

**STIPULATION REGARDING RETURN OF DIGITAL DEVICES AND
ELECTRONICALLY STORED INFORMATION**

The United States of America and defendant Andrew C. Ericson (“Defendant”) hereby agree and stipulate as follows:

RECITALS

1. On or about January 22, 2021, pursuant to a court-authorized search warrant in Case No. 21-MJ-05-GMP (Eastern District of Oklahoma), government agents seized certain digital devices and electronically stored information from defendant’s residence and/or person.

2. Defendant has requested the return of the following specified digital devices and electronically stored information (the “Digital Media”):

- Silver Apple iPhone, model A1784 (Item Number 1B1, Barcode E6048953);
- Dark gray Macbook with serial number C02D77Q8MD6R (Item Number 1B3, Barcode E6048955);
- White HP Chromebook with serial number 5CD7152QN1 (Item Number 1B13, Barcode E6048965);
- Blue and silver USB with marking “Truth Bible Radio with Dr J Vernon McGee” (Item Number 1B15, Barcode E6048967);
- Silver USB and red and white “Attache” USB (Item Number 1B16, Barcode E6048968);
- Black Toshiba storage device with serial number Z2KCTB7NTTS8 (Item Number 1B17, Barcode E6048969);
- Red Scandisk USB with serial number BE0806NKEB (Item Number 1B18, Barcode E6048970);
- White iPhone, model A1638 (Item Number 1B19, Barcode E6048971);

- Gray Lenovo laptop (Item Number 1B20, Barcode E6048972);
- Silver Macbook with serial number C1MRN7F7H3QD (Item Number 1B23, Barcode E6641547); and
- Black tablet with serial number 329F668837FB (Item Number 1B24, Barcode E6641548).

3. The government has created an exact and accurate image (the “Image”) of each of the Digital Media specified in paragraph 2 by performing an extraction for the purpose of searching the Image.

4. The government intends to use materials discovered as a result of its search(es) as evidence in the pending and ongoing investigation and prosecution including, possibly, introducing those materials into evidence at trial or other proceedings.

STIPULATION

Accordingly, the parties AGREE and STIPULATE as follows:

1. The Images are accurate duplicates of the Digital Media and were created using reliable methods.
2. The government will retain, and upon request will provide to defense counsel, the Images extracted from the Digital Media.
3. The Digital Media will be returned to Andrew C. Ericson.
4. The government will retain the Images of the Digital Media, including all evidence thereon, for use at trial and any other proceedings in this matter.
5. The Images of the Digital Media and/or any other copies are “admissible [into evidence] to the same extent as the original,” within the meaning of Federal Rule of Evidence 1003.
6. The government may continue to examine the Images for materials identified in the Search Warrant consistent with the terms of the Search Warrant.

7. Defendant retains the right to challenge the Search Warrant and move to suppress the Images of the Digital Media pursuant to Fed. R. Crim. P. 41(h).

So stipulated.

Respectfully submitted and agreed,

CHANNING D. PHILLIPS
ACTING UNITED STATES ATTORNEY
D.C. Bar Number 415793

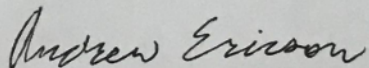
Date: 10/15/2021

By:



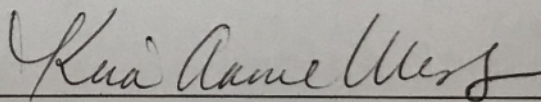
Christine M. Macey
Assistant United States Attorney
555 4th Street, N.W.
Washington, D.C. 20530

Date: 10/15/21



Andrew C. Ericson
Defendant

Date: 10/11/21



Kira Anne West
Attorney for Defendant