

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

<b>UNITED STATES OF AMERICA</b>	:	
	:	<b>CRIMINAL NO. 21-cr-162</b>
<b>v.</b>	:	
	:	
<b>GLEN CROY and TERRY LINDSEY,</b>	:	
	:	
<b>Defendants.</b>	:	

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

The United States of America and defendants Glen Croy and Terry Lindsey hereby agree and stipulate as follows:

**RECITALS**

1. On or about February 17, 2021, government agents seized certain digital devices and electronically stored information from the person of Glen Croy incident to arrest.
2. Defendant Glen Croy has requested the return of the following specified digital devices and electronically stored information (the “Digital Media”): Samsung E10 cellular telephone, IMEI 352808101694180
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 Image is an accurate duplicate of the Digital Media and was created using reliable methods and defendants waive the right to object to the admissibility of the Images of the Digital Media and the right to question witnesses or make arguments concerning the reliability of the methods used to create the Images.
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 Defendant Glen Croy, as requested by defense counsel.
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 Glen Croy 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).

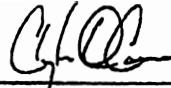
So stipulated.

Respectfully submitted and agreed.

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

Date: Aug 13, 2021

By:



**CLAYTON O'CONNOR**  
Trial Attorney, detailee  
555 4th Street, N.W.  
Washington, D.C. 20530

Date: Aug 16, 2021



**GLEN CROY**  
Defendant

Date: August 16, 2021



**KIRA WEST**  
Attorney for Defendant Glen Croy

Date:

8-29-21



**TERRY LINDSEY**  
Defendant

Date:

8/30/21



**RICHARD STERN**  
Attorney for Defendant Terry Lindsey