No. 25-14507

IN THE UNITED STATES COURT OF APPEALS
FOR THE ELEVENTH CIRCUIT

United States of America,

Plaintiff-Appellee,

v.

Knight First Amendment Institute at Columbia University, American Oversight,

Interested Parties-Appellants

Donald J. Trump; Waltine Nauta; Carlos de Oliveira,

Defendants-Appellees.

On Appeal from the United States District Court
for the Southern District of Florida

No. 9:23-cr-80101-AMC

JOINT APPENDIX TO APPELLANTS' OPENING BRIEFS, VOLUME I

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Case No. 23-cr-80101-AMC, S.D. Fla.,

District Court Docket Sheet

APPEAL,BER,BNDDUTY,REF_EVENTS ONLY (NEFs)

U.S. District Court
Southern District of Florida (West Palm Beach)
CRIMINAL DOCKET FOR CASE #: 9:23-cr-80101-AMC-1

Case title: USA v. Trump, et al.

Date Filed: 06/08/2023

Date Terminated: 07/15/2024

Assigned to: Judge Aileen M. Cannon
Referred to: Magistrate Judge Bruce E. Reinhart

Appeals court case numbers: 24-12311-J USCA, 25-10076-G USCA

Defendant (1)

Donald J. Trump
63675-510
YOB: 1946; English
TERMINATED: 07/15/2024

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Pending Counts | **Disposition**

None

Highest Offense Level (Opening)

None

Terminated Counts | **Disposition**

WILLFUL RETENTION OF NATIONAL DEFENSE INFORMATION/18:793.F (1-31)

WILLFUL RETENTION OF NATIONAL DEFENSE INFORMATION 18:793.F (1s-32s)

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CONSPIRACY TO OBSTRUCT JUSTICE/18:1512K.F
(32)

WITHHOLDING A DOCUMENT OR RECORD/18:1512B.F
(33)

CONSPIRACY TO OBSTRUCT JUSTICE 18:1512K.F
(33s)

CORRUPTLY CONCEALING A DOCUMENT OR RECORD/18:1512C.F
(34)

WITHHOLDING A DOCUMENT OR RECORD 18:1512B.F
(34s)

CONCEALING A DOCUMENT IN A FEDERAL INVESTIGATION/18:1519.F
(35)

CORRUPTLY CONCEALING A DOCUMENT OR RECORD 18:1512C.F
(35s)

SCHEME TO CONCEAL/18:1001.F
(36)

CONCEALING A DOCUMENT IN A FEDERAL INVESTIGATION 18:1519.F
(36s)

FALSE STATEMENTS AND REPRESENTATIONS/18:1001.F
(37)

SCHEME TO CONCEAL 18:1001.F
(37s)

FALSE STATEMENTS AND REPRESENTATIONS 18:1001.F
(38s)

ALTERING, DESTROYING, MUTILATING, OR CONCEALING AN OBJECT 18:1512B.F
(40s)

CORRUPTLY ALTERING, DESTROYING, MUTILATING OR CONCEALING A DOCUMENT, RECORD, OR OTHER OBJECT 18:1512C.F
(41s)

Highest Offense Level (Terminated)

Felony

Complaints **Disposition**

None

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Date Filed	#	Docket Text
06/08/2023	1	MOTION to seal by USA as to Donald J. Trump, Waltine Nauta. (sl) (Entered: 06/08/2023)
06/08/2023	2	ORDER granting 1 Motion to seal as to Donald J. Trump (1), Waltine Nauta (2). Signed by Ch. Magistrate Judge Edwin G. Torres on 6/8/2023. *See attached document for full details*. (sl) (Entered: 06/08/2023)
06/08/2023	3	INDICTMENT as to Donald J. Trump (1) count(s) 1-31, 32, 33, 34, 35, 36, 37, Waltine Nauta (2) count(s) 32, 33, 34, 35, 36, 38. (sl) (Additional attachment(s) added on 6/8/2023: # 1 Restricted Unredacted Indictment) (sl). (Entered: 06/08/2023)
06/08/2023	4	Criminal Summons Issued in case as to Donald J. Trump. Documents contained herein are restricted from public viewing pursuant to the Judicial Conference Policy on Privacy and Public Access to Electronic Case Files. Initial Appearance set for 6/13/2023 03:00 PM in Miami Division (Courtroom 13-3 Wilkie D. Ferguson Building) before MIA Duty Magistrate Judge. (sl) (Entered: 06/08/2023)
06/09/2023	6	MOTION to Unseal by USA as to Donald J. Trump, Waltine Nauta. (sl) (Entered: 06/09/2023)
06/09/2023	7	ORDER UNSEALING CASE, Granting 6 Motion to Unseal as to Donald J. Trump (1), Waltine Nauta (2). Signed by Ch. Magistrate Judge Edwin G. Torres on 6/9/2023. *See attached document for full details*. (sl) (Entered: 06/09/2023)
06/09/2023	8	Press Motion to Intervene and Unseal The Indictment of Former President Donal Trump by WP Company LLC, TEGNA Inc., Reuters News & Media Inc., POLITICO LLC, The New York Times Company, NBC Universal Media, LLC, National Public Radio, Inc., Publisher of The Los Angeles Times, Los Angeles Times Communications LLC, Gray Media Groups, Inc., The E.W. Scripps Company, Publisher of The Wall Street Journal, Dow Jones & Company, Inc., Cox Enterprises, Inc., CBS Broadcasting, Inc., Bloomberg L.P., The Associated Press, American Broadcasting Companies, Inc., Advance Publications, Inc., Cable News Networks, Inc., CMG Media Corporation as to Donald J. Trump. (drz) (Entered: 06/12/2023)
06/12/2023		Attorney update in case as to Donald J. Trump, Waltine Nauta. Attorney Charles David Tobin, Chad R. Bowman, Maxwell S. Mishkin, Lauren Russell for WP Company LLC,

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		TEGNA Inc., Reuters News & Media Inc., POLITICO LLC, The New York Times Company, NBC Universal Media, LLC, National Public Radio, Inc., Los Angeles Times Communications LLC, Gray Media Groups, Inc., The E.W. Scripps Company, Dow Jones & Company, Inc., Cox Enterprises, Inc., CBS Broadcasting, Inc., Charles David Tobin, Bloomberg L.P., The Associated Press, American Broadcasting Companies, Inc., Advance Publications, Inc., Cable News Networks, Inc. added (sk) (Entered: 06/12/2023)
06/12/2023	9	Bar Letter re: Admissions sent to attorneys Chad R. Bowman, Maxwell S. Mishkin, Lauren Russell and Todd Blanche, mailing date June 12, 2023, as to Donald J. Trump, Waltine Nauta. (cw) (Entered: 06/12/2023)
06/12/2023	10	MOTION for (1) pre-hearing photography and videorecording and (2) release of courtroom audio recording by WP Company LLC, TEGNA Inc., Reuters News & Media Inc., POLITICO LLC, The New York Times Company, NBC Universal Media, LLC, National Public Radio, Inc., Los Angeles Times Communications LLC, Gray Media Groups, Inc., The E.W. Scripps Company, Dow Jones & Company, Inc., Cox Enterprises, Inc., CBS Broadcasting, Inc., Bloomberg L.P., The Associated Press, American Broadcasting Companies, Inc., Advance Publications, Inc., Cable News Networks, Inc., CMG Media Corporation as to Donald J. Trump, Waltine Nauta. Responses due by 6/26/2023 (Tobin, Charles) (Entered: 06/12/2023)
06/12/2023	11	ORDER ON "PRESS COALITION" MOTION. Signed by Magistrate Judge Jonathan Goodman on 6/12/2023. *See attached document for full details*. (mkr) (Entered: 06/12/2023)
06/13/2023	12	PAPERLESS ORDER denying as moot 8 Press Motion to Intervene and Unseal the Indictment of Former President Donald Trump. Movants seek to intervene for the "limited purpose of seeking an order promptly unsealing [the] indictment" 8 . By prior Order, the Court already unsealed the indictment 7 . Thus, the Press Motion to Intervene and Unseal is moot. Signed by Judge Aileen M. Cannon on 6/13/2023. (sj00) Modified on 6/13/2023 (tci). (Entered: 06/13/2023)
06/13/2023	13	NOTICE OF ATTORNEY APPEARANCE: Christopher Michael Kise appearing for Donald J. Trump . Attorney Christopher Michael Kise added to party Donald J. Trump(pty:dft). (Kise, Christopher) (Entered: 06/13/2023)
06/13/2023	14	MOTION to Appear Pro Hac Vice, Consent to Designation, and Request to Electronically Receive Notices of Electronic Filing for Todd Blanche. Filing Fee $ 200.00. Receipt # AFLSDC-16688222 by Donald J. Trump. Responses due by 6/27/2023 (Attachments: # 1 Certification, # 2 Text of Proposed Order)(Kise, Christopher) (Entered: 06/13/2023)
06/13/2023		Attorney update in case as to Donald J. Trump, Waltine Nauta. Attorney Todd Blanche for Donald J. Trump added (pt) (Entered: 06/13/2023)
06/13/2023	15	PAPERLESS ORDER granting 14 Motion to Appear *Pro Hac Vice*, Consent to Designation, and Requests to Electronically Receive Notices of Electronic Filings for Attorney Todd Blanche. The Court reserves the power to withdraw permission for special appearance at any time. Failure to abide by any court order or failure to appear at any scheduled matter may result in immediate revocation of counsel's *pro hac vice* status. Local counsel must be ready to adequately represent the party at any time. Signed by Judge Aileen M. Cannon on 6/13/2023. (sj00) (Entered: 06/13/2023)
06/13/2023		Arrest of Donald J. Trump (mdc) (Entered: 06/14/2023)
06/13/2023	16	Minute Order for proceedings held before Magistrate Judge Jonathan Goodman: Initial Appearance and **ARRAIGNMENT** as to Donald J. Trump (1) Count 1-31,32,33,34,35,36,37 held on 6/13/2023. Todd Blanche, pro hac vice and Christopher Kise appeared as PERMANENT Counsel of Record. Bond set: Donald J. Trump (1)

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		Personal Recognizance. *See document for full details.* Court Reporter: Stephanie McCarn, 305-523-5518 / Stephanie_McCarn@flsd.uscourts.gov. It is ORDERED AND ADJUDGED that pursuant to the Due Process Protections Act, the Court confirms the United States obligation to disclose to the defendant all exculpatory evidence- that is, evidence that favors the defendant or casts doubt on the United States case, as required by *Brady v. Maryland*, 373 U.S. 83 (1963) and its progeny, and ORDERS the United States to do so. The government has a duty to disclose any evidence that goes to negating the defendants guilt, the credibility of a witness, or that would reduce a potential sentence. The defendant is entitled to this information without a request. Failure to disclose exculpatory evidence in a timely manner may result in consequences, including, but not limited to, exclusion of evidence, adverse jury instructions, dismissal of charges, contempt proceedings, disciplinary action, or sanctions by the Court. PAPERLESS STANDING DISCOVERY ORDER: The defendant(s) having been arraigned this date in open Court, it is Ordered that within 14 days of the date of this order that all parties to this action shall review and comply with Southern District of Florida Local Rules 88.10 (Criminal Discovery), and 88.9(c) (Motions in Criminal Cases). Upon a sufficient showing, the Court may at any time, upon a properly filed motion, order that the discovery or inspection provided for by this Standing Order be denied, restricted or deferred, or make such other order as is appropriate. It is expected by the Court, however, that counsel for both sides shall make a good faith effort to comply with the letter and spirit of this Standing Order. It shall be the continuing duty of counsel for both sides to immediately reveal to opposing counsel all newly discovered information or other material within the scope of Local Rule 88.10. Signed by Magistrate Judge Jonathan Goodman on 6/13/2023. (mdc) (Entered: 06/14/2023)
06/13/2023	17	Personal Recognizance Bond Entered as to Donald J. Trump Approved by Magistrate Judge Jonathan Goodman. *Please see bond image for conditions of release*. (mdc) (Additional attachment(s) added on 6/14/2023: # 1 Restricted Bond with 7th Page) (mdc). (Main Document 17 replaced on 6/14/2023) (mdc). (Attachment 1 replaced on 6/14/2023) (mdc). (Entered: 06/14/2023)
06/15/2023	20	PAPERLESS ORDER: **On or before June 16, 2023**, all attorneys of record and forthcoming attorneys of record shall contact the Litigation Security Group of the U.S. Department of Justice, if they have not done so already, to expedite the necessary clearance process for all team members anticipated to participate in this matter, and thereafter file a Notice of Compliance **no later than June 20, 2023**. Signed by Judge Aileen M. Cannon on 6/15/2023. (sj00) (Entered: 06/15/2023)
06/16/2023	21	NOTICE of Compliance by Donald J. Trump re 20 Order, (Kise, Christopher) (Entered: 06/16/2023)
06/16/2023	22	NOTICE OF ATTORNEY APPEARANCE Julie A. Edelstein appearing for USA. . Attorney Julie A. Edelstein added to party USA(pty:pla). (Edelstein, Julie) (Entered: 06/16/2023)
06/16/2023	23	MOTION for Protective Order by USA as to Donald J. Trump, Waltine Nauta. Responses due by 6/30/2023 (Attachments: # 1 Text of Proposed Order)(Bratt, Jay) (Entered: 06/16/2023)
06/16/2023	24	NOTICE OF ATTORNEY APPEARANCE Karen E. Gilbert appearing for USA. . Attorney Karen E. Gilbert added to party USA(pty:pla). (Gilbert, Karen) (Entered: 06/16/2023)

06/16/2023	25	PAPERLESS ORDER. Pursuant to 28 U.S.C. § 636 and the Magistrate Rules of the Local Rules of the Southern District of Florida, the Government's Motion for Protective Order 23 is hereby referred to Magistrate Judge Bruce E. Reinhart for appropriate disposition. Signed by Judge Aileen M. Cannon on 6/16/2023. (sj00) (Entered: 06/16/2023)
06/16/2023	26	NOTICE OF ATTORNEY APPEARANCE David Harbach appearing for USA. . Attorney David Harbach added to party USA(pty:pla). (Harbach, David) (Entered: 06/16/2023)
06/19/2023	27	ORDER granting 23 Unopposed Motion for Protective Order as to Donald J. Trump (1), Waltine Nauta (2). Signed by Magistrate Judge Bruce E. Reinhart *See attached document for full details*. (BER) (Entered: 06/19/2023)
06/20/2023	28	OMNIBUS ORDER SETTING TRIAL DATE AND ESTABLISHING PRETRIAL INSTRUCTIONS AND SENTENCING PROCEDURES as to Donald J. Trump. In Limine Motions due by 7/24/2023. Motions due by 7/24/2023. Calendar Call set for 8/8/2023 01:45 PM in Fort Pierce Division before Judge Aileen M. Cannon. Jury Trial set for 8/14/2023 in Fort Pierce Division before Judge Aileen M. Cannon. Signed by Judge Aileen M. Cannon on 6/20/2023. *See attached document for full details*. (drz) **Pattern Jury Instruction Builder -** To access the latest, up to date changes to the 11th Circuit Pattern Jury Instructions go to https://pji.ca11.uscourts.gov or click here. (Entered: 06/20/2023)
06/21/2023	29	NOTICE OF ATTORNEY APPEARANCE Michael Thakur appearing for USA. . Attorney Michael Thakur added to party USA(pty:pla). (Thakur, Michael) (Entered: 06/21/2023)
06/21/2023	30	First RESPONSE to Standing Discovery Order by USA as to Donald J. Trump, Waltine Nauta (Edelstein, Julie) (Entered: 06/21/2023)
06/22/2023	31	TRANSCRIPT of Initial Appearance and Arraignment as to Donald J. Trump, Waltine Nauta held on 06/13/23, before Magistrate Judge Jonathan Goodman, 1-36 pages, Court Reporter: Stephanie McCarn, 305-523-5518 / Stephanie_McCarn@flsd.uscourts.gov. Transcript may be viewed at the court public terminal or purchased by contacting the Court Reporter/Transcriber before the deadline for Release of Transcript Restriction. After that date it may be obtained through PACER. Redaction Request due 7/13/2023. Redacted Transcript Deadline set for 7/24/2023. Release of Transcript Restriction set for 9/20/2023. (smn) (Entered: 06/22/2023)
06/23/2023	32	MOTION for Hearing *Pursuant to Classified Information Procedures Act* by USA as to Donald J. Trump, Waltine Nauta. Responses due by 7/7/2023 (Attachments: # 1 Text of Proposed Order)(Bratt, Jay) (Entered: 06/23/2023)
06/23/2023	33	MOTION for Bond *to Implement Special Condition of Release* by USA as to Donald J. Trump, Waltine Nauta. Responses due by 7/7/2023 (Attachments: # 1 Text of Proposed Order)(Bratt, Jay) (Entered: 06/23/2023)
06/23/2023	34	MOTION to Continue Trial by USA as to Donald J. Trump, Waltine Nauta. Responses due by 7/7/2023 (Attachments: # 1 Exhibit A, # 2 Exhibit B, # 3 Exhibit C)(Harbach, David) (Entered: 06/23/2023)
06/26/2023	35	MOTION to Intervene and Oppose the Government's Motion to File Witness List Under Seal by WP Company LLC, TEGNA Inc., Reuters News & Media Inc., POLITICO LLC, The New York Times Company, NBC Universal Media, LLC, National Public Radio, Inc., Los Angeles Times Communications LLC, Gray Media Groups, Inc., The E.W. Scripps Company, Dow Jones & Company, Inc., Cox Enterprises, Inc., CBS Broadcasting, Inc., Bloomberg L.P., The Associated Press, American Broadcasting Companies, Inc., Advance Publications, Inc., Cable News Networks, Inc., CMG Media

		Corporation as to Donald J. Trump, Waltine Nauta re 35 MOTION for Bond *to Implement Special Condition of Release* Replies due by 7/3/2023.. Attorney Charles David Tobin added to party CMG Media Corporation(pty:ip). (Tobin, Charles) Modified Title Text and to convert to a Motion on 6/26/2023 (pcs). (Entered: 06/26/2023)
06/26/2023	36	MOTION to Appear Pro Hac Vice, Consent to Designation, and Request to Electronically Receive Notices of Electronic Filing for Chad R. Bowman. Filing Fee $ 200.00. Receipt # FLSDC-16717919 by Univision Networks & Studios, Inc., Telemundo Network Group LLC, Reuters News & Media Inc., Radio Television Digital News Association, National Cable Satellite Corporation, WP Company LLC, TEGNA Inc., POLITICO LLC, The New York Times Company, NBC Universal Media, LLC, National Public Radio, Inc., Los Angeles Times Communications LLC, Gray Media Groups, Inc., The E.W. Scripps Company, Dow Jones & Company, Inc., Cox Enterprises, Inc., CBS Broadcasting, Inc., Bloomberg L.P., The Associated Press, American Broadcasting Companies, Inc., Advance Publications, Inc., Cable News Networks, Inc. as to Donald J. Trump, Waltine Nauta. Responses due by 7/10/2023 (Attachments: # 1 Certification, # 2 Text of Proposed Order) (Tobin, Charles) (Entered: 06/26/2023)
06/26/2023	37	MOTION to Appear Pro Hac Vice, Consent to Designation, and Request to Electronically Receive Notices of Electronic Filing for Maxwell S.Mishkin. Filing Fee $ 200.00. Receipt # FLSDC-16717981 by Univision Networks & Studios, Inc., Telemundo Network Group LLC, Reuters News & Media Inc., Radio Television Digital News Association, National Cable Satellite Corporation, WP Company LLC, TEGNA Inc., POLITICO LLC, The New York Times Company, NBC Universal Media, LLC, National Public Radio, Inc., Los Angeles Times Communications LLC, Gray Media Groups, Inc., The E.W. Scripps Company, Dow Jones & Company, Inc., Cox Enterprises, Inc., CBS Broadcasting, Inc., Bloomberg L.P., The Associated Press, American Broadcasting Companies, Inc., Advance Publications, Inc., Cable News Networks, Inc. as to Donald J. Trump, Waltine Nauta. Responses due by 7/10/2023 (Attachments: # 1 Certification, # 2 Text of Proposed Order) (Tobin, Charles) (Entered: 06/26/2023)
06/26/2023	38	MOTION to Appear Pro Hac Vice, Consent to Designation, and Request to Electronically Receive Notices of Electronic Filing for Matthew S.L. Cate. Filing Fee $ 200.00. Receipt # FLSDC-16718009 by Univision Networks & Studios, Inc., Telemundo Network Group LLC, Reuters News & Media Inc., Radio Television Digital News Association, National Cable Satellite Corporation, WP Company LLC, TEGNA Inc., POLITICO LLC, The New York Times Company, NBC Universal Media, LLC, National Public Radio, Inc., Los Angeles Times Communications LLC, Gray Media Groups, Inc., The E.W. Scripps Company, Dow Jones & Company, Inc., Cox Enterprises, Inc., CBS Broadcasting, Inc., Bloomberg L.P., The Associated Press, American Broadcasting Companies, Inc., Advance Publications, Inc., Cable News Networks, Inc. as to Donald J. Trump, Waltine Nauta. Responses due by 7/10/2023 (Attachments: # 1 Certification, # 2 Text of Proposed Order) (Tobin, Charles) (Entered: 06/26/2023)

06/26/2023	39	MOTION to Appear Pro Hac Vice, Consent to Designation, and Request to Electronically Receive Notices of Electronic Filing for Lauren Russell. Filing Fee $ 200.00. Receipt # FLSDC-16718168 by Univision Networks & Studios, Inc., Telemundo Network Group LLC, Reuters News & Media Inc., Radio Television Digital News Association, National Cable Satellite Corporation, WP Company LLC, TEGNA Inc., POLITICO LLC, The New York Times Company, NBC Universal Media, LLC, National Public Radio, Inc., Los Angeles Times Communications LLC, Gray Media Groups, Inc., The E.W. Scripps Company, Dow Jones & Company, Inc., Cox Enterprises, Inc., CBS Broadcasting, Inc., Bloomberg L.P., The Associated Press, American Broadcasting Companies, Inc., Advance Publications, Inc., Cable News Networks, Inc. as to Donald J. Trump, Waltine Nauta. Responses due by 7/10/2023 (Attachments: # 1 Certification, # 2 Text of Proposed Order) (Tobin, Charles) (Entered: 06/26/2023)
06/26/2023		Attorney update in case as to Donald J. Trump, Waltine Nauta. Attorney Matthew S.L. Cate for Univision Networks & Studios, Inc., Matthew S.L. Cate for Telemundo Network Group LLC, Matthew S.L. Cate for Reuters News & Media Inc., Matthew S.L. Cate for Radio Television Digital News Association, Matthew S.L. Cate for National Cable Satellite Corporation, Matthew S.L. Cate for WP Company LLC, Matthew S.L. Cate for TEGNA Inc., Matthew S.L. Cate for POLITICO LLC, Matthew S.L. Cate for The New York Times Company, Matthew S.L. Cate for NBC Universal Media, LLC, Matthew S.L. Cate for National Public Radio, Inc., Matthew S.L. Cate for Los Angeles Times Communications LLC, Matthew S.L. Cate for Gray Media Groups, Inc., Matthew S.L. Cate for The E.W. Scripps Company, Matthew S.L. Cate for Dow Jones & Company, Inc., Matthew S.L. Cate for Cox Enterprises, Inc., Matthew S.L. Cate for CBS Broadcasting, Inc., Matthew S.L. Cate for Bloomberg L.P., Matthew S.L. Cate for The Associated Press, Matthew S.L. Cate for American Broadcasting Companies, Inc., Matthew S.L. Cate for Advance Publications, Inc., Matthew S.L. Cate for Cable News Networks, Inc. added (pt) (Entered: 06/26/2023)
06/26/2023		Attorney update in case as to Donald J. Trump, Waltine Nauta. Attorney Maxwell S. Mishkin, Chad R. Bowman for National Cable Satellite Corporation added (pt) (Entered: 06/26/2023)
06/26/2023		Attorney update in case as to Donald J. Trump, Waltine Nauta. Attorney Maxwell S. Mishkin, Chad R. Bowman for Radio Television Digital News Association added (pt) (Entered: 06/26/2023)
06/26/2023		Attorney update in case as to Donald J. Trump, Waltine Nauta. Attorney Matthew S.L. Cate for Reuters News & Media Inc. added (pt) (Entered: 06/26/2023)
06/26/2023		Attorney update in case as to Donald J. Trump, Waltine Nauta. Attorney Matthew S.L. Cate for Reuters News & Media Inc. added (pt) (Entered: 06/26/2023)
06/26/2023		Attorney update in case as to Donald J. Trump, Waltine Nauta. Attorney Maxwell S. Mishkin, Chad R. Bowman for Telemundo Network Group LLC added (pt) (Entered: 06/26/2023)
06/26/2023		Attorney update in case as to Donald J. Trump, Waltine Nauta. Attorney Maxwell S. Mishkin, Chad R. Bowman for Univision Networks & Studios, Inc. added (pt) (Entered: 06/26/2023)
06/26/2023		Attorney update in case as to Donald J. Trump, Waltine Nauta. Attorney Lauren Russell for Univision Networks & Studios, Inc., Lauren Russell for Telemundo Network Group LLC, Lauren Russell for Radio Television Digital News Association, Lauren Russell for National Cable Satellite Corporation added (pt) (Entered: 06/26/2023)

06/26/2023		SYSTEM ENTRY - Docket Entry 40 restricted/sealed until further notice. (pcs) (Entered: 06/26/2023)
06/26/2023	41	PAPERLESS ORDER denying without prejudice 33 Government's Motion to Implement Special Condition of Release. The Government seeks an order implementing a special condition of bond related to Defendants' communication with eighty-four listed witnesses about the facts of the case, except through counsel [ECF No. 17 p. 4]. The Government conditions its request on the filing of the non-exhaustive list under seal. Defendants take no position on the Government's seal request but reserve the right to object to the special condition and the manner by which the Government intends to implement it. In the meantime, numerous news organizations have moved to intervene to oppose the Government's Motion to File Witness List Under Seal, citing the First Amendment and related legal principles 35 . Upon review of the foregoing materials, the Government's Motion 33 is denied without prejudice, and the Motion to Intervene 35 and accompanying Motions to Appear Pro Hac Vice 36 37 38 39 are denied as moot. The Government's Motion does not explain why filing the list with the Court is necessary; it does not offer a particularized basis to justify sealing the list from public view; it does not explain why partial sealing, redaction, or means other than sealing are unavailable or unsatisfactory; and it does not specify the duration of any proposed seal. *See* S.D. Fla. L.R. 5.4(a), (c)(1). The Clerk is directed to return the Pro Hac Vice fees to the filing attorneys. Signed by Judge Aileen M. Cannon on 6/26/2023. (sj00) (Entered: 06/26/2023)
06/26/2023	42	Order Granting Unopposed Motion for Pretrial Conference Pursuant to Section 2 of the Classified Information Procedures Act. A pretrial conference pursuant to Section 2 of the CIPA is set for 7/14/2023 at 10:00 AM in the Fort Pierce Division before Judge Aileen M. Cannon. Signed by Judge Aileen M. Cannon on 6/26/2023. *See attached document for full details*. (kts) (Entered: 06/26/2023)
06/26/2023	43	PAPERLESS ORDER: On or before July 6, 2023, Defendants shall respond to the Government's Motion for Continuance 34 , either individually or in a combined filing. Signed by Judge Aileen M. Cannon on 6/26/2023. (kts) (Entered: 06/26/2023)
06/27/2023	45	MOTION TO FILE DOCUMENTS UNDER SEAL. (amb) Modified to Unseal per DE 558 on 5/21/2024 (amb). (Entered: 06/28/2023)
06/28/2023		SYSTEM ENTRY - Docket Entry 45 restricted/sealed until further notice. (amb) (Entered: 06/28/2023)
06/28/2023		SYSTEM ENTRY - Docket Entry 46 restricted/sealed until further notice. (amb) (Entered: 06/28/2023)
06/29/2023	48	ORDER Granting 45 MOTION TO FILE DOCUMENTS UNDER SEAL as to Donald J. Trump (1), Waltine Nauta (2). The Motion [ECF No. 45], Notice [ECF No. 46], and accompanying exhibit [ECF No. 46-1] shall remain under SEAL until further Court order. Signed by Judge Aileen M. Cannon on 6/29/2023. *See attached document for full details*. (cds) Modified to Unseal per DE 558 on 5/21/2024 (amb). (Entered: 06/29/2023)
06/29/2023		SYSTEM ENTRY - Docket Entry 48 restricted/sealed until further notice. (cds) (Entered: 06/29/2023)
06/30/2023	49	PAPERLESS ORDER: In light of the postponement of Defendant Waltine Nauta's arraignment 44 47 , the deadline for Defendants to respond to the Government's Motion for Continuance 34 is hereby reset to July 10, 2023. Signed by Judge Aileen M. Cannon on 6/30/2023. (kts) (Entered: 06/30/2023)

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06/30/2023		Set/Reset Deadlines/Hearings as per order DE#49 in case as to Donald J. Trump, Waltine Nauta 34 MOTION to Continue Trial . Responses due by 7/10/2023 (drz) (Entered: 06/30/2023)
07/06/2023	56	Clerk's Notice of Filing Fee refunded pursuant to ECF No. 41 PAPERLESS ORDER in the amount of $200.00 on July 06, 2023 re: 36 MOTION to Appear Pro Hac Vice, Consent to Designation, and Request to Electronically Receive Notices of Electronic Filing for Chad R. Bowman. Filing Fee $ 200.00. Receipt # AFLSDC-16717919. Additional Notice of Electronic Filing (NEF) sent to Financial Clerk (jc) (Entered: 07/06/2023)
07/06/2023	57	PAPERLESS ORDER: On or before July 13, 2023, and as directed by the Litigation Security Group of the Department of Justice, all attorneys of record shall complete all outstanding applicant tasks required to obtain the requisite security clearances in this matter, and thereafter file a Notice of Compliance no later than July 13, 2023. Signed by Judge Aileen M. Cannon on 7/6/2023. (kts) (Entered: 07/06/2023)
07/06/2023	58	ORDER granting provisional CM/ECF access to Defendant Waltine Nauta's counsel, Sasha Dadan. Signed by Ch. Magistrate Judge Edwin G. Torres on 7/6/2023. *See attached document for full details*. (elk) (Entered: 07/06/2023)
07/06/2023	59	Second RESPONSE to Standing Discovery Order by USA as to Donald J. Trump, Waltine Nauta (Edelstein, Julie) (Entered: 07/06/2023)
07/07/2023	60	Clerk's Notice of Filing Fee refunded pursuant to ECF No. 41 PAPERLESS ORDER in the amount of $200.00 on July 07, 2023 re: 37 MOTION to Appear Pro Hac Vice, Consent to Designation, and Request to Electronically Receive Notices of Electronic Filing for Maxwell S.Mishkin. Filing Fee $ 200.00. Receipt # FLSDC-16717981. Additional Notice of Electronic Filing (NEF) sent to Financial Clerk (jc) (Entered: 07/07/2023)
07/07/2023	61	Clerk's Notice of Filing Fee refunded pursuant to ECF No. 41 PAPERLESS ORDER in the amount of $200.00 on July 07, 2023 re: 38 MOTION to Appear Pro Hac Vice, Consent to Designation, and Request to Electronically Receive Notices of Electronic Filing for Matthew S.L. Cate. Filing Fee $ 200.00. Receipt # AFLSDC-16718009. Additional Notice of Electronic Filing (NEF) sent to Financial Clerk (jc) (Entered: 07/07/2023)
07/07/2023	62	Clerk's Notice of Filing Fee refunded pursuant to ECF No. 41 PAPERLESS ORDER in the amount of $200.00 on July 07, 2023 re: 39 MOTION to Appear Pro Hac Vice, Consent to Designation, and Request to Electronically Receive Notices of Electronic Filing for Lauren Russell. Filing Fee $ 200.00. Receipt # AFLSDC-16718168. Additional Notice of Electronic Filing (NEF) sent to Financial Clerk (jc) (Entered: 07/07/2023)
07/10/2023	65	RESPONSE to Motion by Donald J. Trump as to Donald J. Trump, Waltine Nauta re 63 MOTION to Continue *pretrial CIPA conference* Replies due by 7/17/2023. (Kise, Christopher) (Entered: 07/10/2023)
07/10/2023	66	RESPONSE in Opposition by Donald J. Trump as to Donald J. Trump, Waltine Nauta re 34 MOTION to Continue Trial Replies due by 7/17/2023. (Kise, Christopher) (Entered: 07/10/2023)
07/11/2023	68	PAPERLESS ORDER: Being fully advised in the premises, the Court grants in part 63 and authorizes a 4-Day Continuance of the Pretrial CIPA Section 2 Conference. The Pretrial CIPA Section 2 Conference is hereby rescheduled to July 18, 2023, at 2:00 P.M. in

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		the Fort Pierce Division. All other aspects of the Court's prior Order remain in effect. Signed by Judge Aileen M. Cannon on 7/11/2023. (sj00) (Entered: 07/11/2023)
07/11/2023		Reset Hearings as to Donald J. Trump, Waltine Nauta: Per DE#68. Pretrial CIPA Section 2 Conference set for 7/18/2023 DE# Modified on 7/11/2023 (cqs). (Entered: 07/11/2023)
07/11/2023	72	SPEEDY TRIAL REPORT *First Speedy Trial Report* by USA as to Donald J. Trump, Waltine Nauta (Bratt, Jay) (Entered: 07/11/2023)
07/12/2023	74	MOTION to Appear Pro Hac Vice, Consent to Designation, and Request to Electronically Receive Notices of Electronic Filing for Stephen H. Weiss. Filing Fee $ 200.00. Receipt # AFLSDC-16760010 by Donald J. Trump. Responses due by 7/26/2023 (Attachments: # 1 Certification, # 2 Text of Proposed Order)(Kise, Christopher) (Entered: 07/12/2023)
07/13/2023		Attorney update in case as to Donald J. Trump. Attorney Stephen H. Weiss for Donald J. Trump added (pt) (Entered: 07/13/2023)
07/13/2023	75	PAPERLESS ORDER granting 74 the Motion to Appear *Pro Hac Vice*, Consent to Designation, and Request to Electronically Receive Notices of Electronic Filing for Attorney Stephen H. Weiss. The Court reserves the power to withdraw permission for special appearance at any time. Failure to abide by any court order or failure to appear at any scheduled matter may result in immediate revocation of counsel's *pro hac vice* status. Local counsel must be ready to adequately represent the party at any time. Signed by Judge Aileen M. Cannon on 7/13/2023. (kts) (Entered: 07/13/2023)
07/13/2023	76	REPLY TO RESPONSE to Motion by USA as to Donald J. Trump, Waltine Nauta re 34 MOTION to Continue Trial (Harbach, David) (Entered: 07/13/2023)
07/13/2023	77	NOTICE of Compliance by Donald J. Trump re 57 Order, (Kise, Christopher) (Entered: 07/13/2023)
07/17/2023	79	MOTION for Protective Order *Pursuant to Section 3 of the Classified Information Procedures Act* by USA as to Donald J. Trump, Waltine Nauta. Responses due by 7/31/2023 (Attachments: # 1 Text of Proposed Order)(Edelstein, Julie) (Entered: 07/17/2023)
07/17/2023	80	Supplemental RESPONSE to Standing Discovery Order by USA as to Donald J. Trump, Waltine Nauta (Edelstein, Julie) (Entered: 07/17/2023)
07/17/2023	81	PAPERLESS ORDER: The parties shall be prepared to discuss the Government's Motion for Continuance and Proposed Revised Scheduling Order 34 at the CIPA Section 2 pretrial conference scheduled for July 18, 2023, including the proposed deadlines contained therein [34-2] and particularized objections thereto, in light of 18 U.S.C. § 3161, the Federal Rules of Criminal Procedure, and the CIPA. Signed by Judge Aileen M. Cannon on 7/17/2023. (kts) (Entered: 07/17/2023)
07/18/2023	82	PAPERLESS Minute Entry for proceedings held before Judge Aileen M. Cannon: Pretrial Conference Pursuant to Section 2 of CIPA held on July 18, 2023. The Court heard argument from the parties on the Government's Motion for Continuance and Request for Proposed Revised Scheduling Order 34 . The Court denied the Government's Motion for Protective Order 79 without prejudice for lack of meaningful conferral. Order to follow. Total time in court: 1 hour, 40 minutes. Attorney Appearances: Jay I. Bratt, David Harbach, Julie A. Edelstein, Christopher Michael Kise, Todd Blanche, Sasha Dadan, Stanley E. Woodward. Other Appearances: Waltine Nauta. Court Reporter: Diane Miller, 772-467-2337 / Diane_Miller@flsd.uscourts.gov. (kts) (Entered: 07/19/2023)
07/21/2023	83	ORDER GRANTING IN PART GOVERNMENT'S MOTION 34 TO CONTINUE TRIAL AND RESETTING DEADLINES. The Government's Motion to Continue Trial and Revised Proposed Schedule 34 is GRANTED IN PART. Calendar Call is hereby reset

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		for Tuesday, 5/14/2024 at 01:45 PM in Fort Pierce Division before Judge Aileen M. Cannon. Jury Trial is hereby reset for Monday, 5/20/2024 at 09:30 AM in Fort Pierce Division before Judge Aileen M. Cannon. Signed by Judge Aileen M. Cannon on 7/21/2023. *See attached document for full details*. (mno) (Entered: 07/21/2023)
07/27/2023	84	Renewed MOTION for Protective Order *Pursuant to Section 3 of the Classified Information Procedures Act* by USA as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira. Responses due by 8/10/2023 (Attachments: # 1 Text of Proposed Order) (Edelstein, Julie) (Entered: 07/27/2023)
07/27/2023	85	SUPERSEDING INDICTMENT as to Donald J. Trump (1) count(s) 1s-32s, 33s, 34s, 35s, 36s, 37s, 38s, 40s, 41s, Waltine Nauta (2) count(s) 33s, 34s, 35s, 36s, 37s, 39s, 40s, 41s, Carlos De Oliveira (3) count(s) 33s, 40s, 41s, 42s. (mdc) (Additional attachment(s) added on 7/27/2023: # 1 Restricted Unredacted Indictment) (mdc). (Entered: 07/27/2023)
07/27/2023	86	NOTICE *of Superseding Indictment* by USA as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira re 85 Indictment, (Thakur, Michael) (Entered: 07/27/2023)
07/31/2023	92	Supplemental RESPONSE to Standing Discovery Order by USA as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira (Edelstein, Julie) (Entered: 07/31/2023)
08/01/2023	93	SPEEDY TRIAL REPORT *Second Speedy Trial Report* by USA as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira (Bratt, Jay) (Entered: 08/01/2023)
08/01/2023	94	PAPERLESS Order as to Donald J. Trump and Waltine Nauta. The Arraignment on the Superseding Indictment is set for 8/10/2023 at 10:00 AM in the Fort Pierce Division before U.S. Magistrate Judge Shaniek Mills Maynard at the Alto Lee Adams, Sr. United States Courthouse, 101 South U.S. Highway 1, 4th Floor - Courtroom 4074, Fort Pierce, FL 34950. Signed by Ch. Magistrate Judge Edwin G. Torres on 8/1/2023. (mdc) (Entered: 08/01/2023)
08/02/2023		SYSTEM ENTRY - Docket Entry 95 restricted/sealed until further notice. (amb) (Entered: 08/02/2023)
08/02/2023		SYSTEM ENTRY - Docket Entry 96 restricted/sealed until further notice. (amb) (Entered: 08/02/2023)
08/04/2023	98	WAIVER of Personal Appearance at Arraignment and Entry of Plea of Not Guilty by Donald J. Trump (Kise, Christopher) (Entered: 08/04/2023)
08/07/2023	100	ORDER STRIKING SEALED FILINGS AND ORDERING BRIEFING. Order denying 95 Sealed Motion. Clerk is directed to Strike from the docket sealed entries 95 and 96. Waltine Nauta shall file a response to the Motion for a Garcia hearing 97 on or before 8/17/2023. Special Counsel shall reply on or before 8/22/2023. Signed by Judge Aileen M. Cannon on 8/7/2023. *See attached document for full details*. (jmd) (Entered: 08/07/2023)
08/07/2023	101	*UNSEALED* SEALED ORDER REQUIRING SEALED WRITTEN SUBMISSIONS. *See attached document for full details*. Status Report(s) deadline: 8/11/2023. Signed by Judge Aileen M. Cannon on 8/7/2023. (jmd) Modified on 4/23/2024; Unsealed, per Order DE #472. (jmd) (Entered: 08/07/2023)
08/07/2023	102	Unopposed MOTION to Bring Electronic Equipment into the courtroom *for the August 10, 2023 Arraignment* by USA Today, The Palm Beach Post, WPLG, Inc., Univision Networks & Studios, Inc., Telemundo Network Group LLC, Sun-Sentinel Company, LLC, Radio Television Digital News Association, Orlando Sentinel Media Group, National Cable Satellite Corporation, The McClatchy Company, LLC, Insider Inc., Guardian News & Media Limited, Fort Myers Broadcasting Company, WP Company LLC, TEGNA Inc., Reuters News & Media Inc., POLITICO LLC, The New York Times

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		Company, NBC Universal Media, LLC, National Public Radio, Inc., Los Angeles Times Communications LLC, Gray Media Groups, Inc., The E.W. Scripps Company, Dow Jones & Company, Inc., Cox Enterprises, Inc., CBS Broadcasting, Inc., Bloomberg L.P., The Associated Press, American Broadcasting Companies, Inc., Advance Publications, Inc., Cable News Networks, Inc., CMG Media Corporation as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira. Responses due by 8/21/2023 (Tobin, Charles) (Entered: 08/07/2023)
08/09/2023	103	PAPERLESS ORDER denying 102 motion for permission to bring electronic equipment into the Alto Lee Adams Sr. United States Courthouse for the August 10, 2023 arraignment. Signed by Judge Aileen M. Cannon on 8/9/2023. (sj00) (Entered: 08/09/2023)
08/09/2023	104	RESPONSE in Opposition by Donald J. Trump re 84 Renewed MOTION for Protective Order *Pursuant to Section 3 of the Classified Information Procedures Act* Replies due by 8/16/2023. (Attachments: # 1 Exhibit 1 - Affirmation of Todd Blanche, # 2 Exhibit 2 - July 18, 2023 Hearing Transcript) (Kise, Christopher) (Entered: 08/09/2023)
08/10/2023	106	Minute Order for proceedings held before Magistrate Judge Shaniek Mills Maynard: **ARRAIGNMENT** as to Donald J. Trump (1) Count 1s-32s,33s,34s,35s,36s,37s,38s,40s,41s held on 8/10/2023. Defendant waived his appearance for his arraignment. Defendant pleads not guilty, demands a trial by jury, and the Standing Discovery Order entered on June 13, 2023 remains in effect. Court Reporter: Diane Miller, 772-467-2337 / Diane_Miller@flsd.uscourts.gov. Signed by Magistrate Judge Shaniek Mills Maynard on 8/10/2023. (mab) (Entered: 08/10/2023)
08/10/2023	111	WAIVER of Personal Appearance at Arraignment and Entry of Plea of Not Guilty by Donald J. Trump. (mab) (Entered: 08/10/2023)
08/11/2023	113	Supplemental RESPONSE to Standing Discovery Order by USA as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira (Edelstein, Julie) (Entered: 08/11/2023)
08/11/2023	114	PAPERLESS ORDER: On or before August 22, 2023, all new counsel of record who do not already possess a required security clearance shall initiate and complete all tasks as directed by the Litigation Security Group of the U.S. Department of Justice, and thereafter file a Notice of Compliance no later than August 23, 2023. Signed by Judge Aileen M. Cannon on 8/11/2023. (kts) (Entered: 08/11/2023)
08/11/2023	115	*UNSEALED* REPORT in Response to the Court's Sealed Order on August 7, 2023 by USA as to all Defendants. (Attachments: # 1 Attachment A) (kpe) Modified on 4/23/2024; Unsealed, per Order DE #472. (jmd) (Entered: 08/11/2023)
08/11/2023	116	*UNSEALED* SUPPLEMENTAL REPORT in Response to the Court's Sealed Order on August 7, 2023 by USA as to all Defendants. (Attachments: # 1 Exhibit A) (kpe) Modified on 4/23/2024; Unsealed, per Order DE #472. (jmd) (Entered: 08/11/2023)
08/14/2023	119	ORDER granting DE# 117 Motion to Extend Time. Defendant Nauta's Brief for the Court DE # 118 is considered timely filed. Signed by Judge Aileen M. Cannon on 8/14/2023. *See attached document for full details*. (jmd) Modified to Unseal per DE 534 Order on 5/9/2024 (amb). (Entered: 08/14/2023)
08/14/2023	120	REPLY TO RESPONSE to Motion by USA as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira re 84 Renewed MOTION for Protective Order *Pursuant to Section 3 of the Classified Information Procedures Act* (Edelstein, Julie) (Entered: 08/14/2023)
08/15/2023	122	Supplemental RESPONSE to Standing Discovery Order by USA as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira (Edelstein, Julie) (Entered: 08/15/2023)

08/17/2023	124	ORDER Scheduling Sealed Hearing on CIPA Section 3 Protective Order. Signed by Judge Aileen M. Cannon on 8/17/2023. *See attached document for full details*. (kts) (Entered: 08/17/2023)
08/17/2023	125	NOTICE *Regarding Filings In A Separate Case* by Donald J. Trump (Attachments: # 1 Exhibit 1, # 2 Exhibit 2, # 3 Exhibit 3) (Kise, Christopher) (Entered: 08/17/2023)
08/17/2023	126	RESPONSE in Opposition by Waltine Nauta as to Donald J. Trump, Waltine Nauta re 97 MOTION for Hearing *on Potential Conflicts of Interest, pursuant to United States v. Garcia, 517 F.2d 272 (5th Cir. 1975),* Replies due by 8/24/2023. (Dadan, Sasha) (Entered: 08/17/2023)
08/18/2023	127	Supplemental MOTION for Protective Order *Pursuant to Section 3 of the Classified Information Procedures Act* by USA as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira. Responses due by 9/1/2023 (Attachments: # 1 Text of Proposed Order) (Edelstein, Julie) (Entered: 08/18/2023)
08/22/2023	130	SPEEDY TRIAL REPORT *Third Speedy Trial Report* by USA as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira (Bratt, Jay) (Entered: 08/22/2023)
08/25/2023	136	NOTICE *of Filing* by USA as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira (Attachments: # 1 Exhibit Exhibit 1) (Bratt, Jay) (Entered: 08/25/2023)
09/01/2023	139	SEALED ORDER as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira re 138 Sealed Motion.(Sur-Reply due by 9/5/2023., Telephonic Motion Hearing set for 9/1/2023 11:00 AM before Judge Aileen M. Cannon.) Signed by Judge Aileen M. Cannon on 9/1/2023. (pcs) Modified to Unseal per DE 558 on 5/21/2024 (amb). (Entered: 09/01/2023)
09/01/2023		SYSTEM ENTRY - Docket Entry 142 restricted/sealed until further notice. (pcs) (Entered: 09/01/2023)
09/01/2023	143	Supplemental RESPONSE to Standing Discovery Order by USA as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira (Edelstein, Julie) (Entered: 09/01/2023)
09/07/2023	146	NOTICE OF ATTORNEY APPEARANCE John M. Pellettieri appearing for USA. . Attorney John M. Pellettieri added to party USA(pty:pla). (Pellettieri, John) (Entered: 09/07/2023)
09/12/2023	147	SPEEDY TRIAL REPORT *Fourth Speedy Trial Report* by USA as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira (Bratt, Jay) (Entered: 09/12/2023)
09/12/2023	149	PAPERLESS Minute Entry for proceedings held before Judge Aileen M. Cannon: Sealed Hearing held on September 12, 2023. The Court heard argument from the parties on the Special Counsel's Motions for Protective Order Pursuant to Section 3 of the Classified Information Procedures Act 84 127 . Orders to follow. Total time in court: 2 hours, 5 minutes. Attorney Appearances: Jay I. Bratt, David Harbach, John M. Pellettieri, Christopher Michael Kise, Todd Blanche, Sasha Dadan, Stanley E. Woodward, Larry Donald Murrell, Jr., John S. Irving. Other Appearances: Waltine Nauta. Court Reporter: Diane Miller, 772-467-2337 / Diane_Miller@flsd.uscourts.gov. (kts) (Entered: 09/13/2023)
09/13/2023	150	Protective Order Pertaining to Classified Information Disclosed to Former President Donald J. Trump and Defense Counsel. Signed by Judge Aileen M. Cannon on 9/13/2023. *See attached document for full details*. (kts) (Entered: 09/13/2023)
09/13/2023	153	Order Following CIPA Section 3 Hearing. Signed by Judge Aileen M. Cannon on 9/13/2023. *See attached document for full details*. (kts) (Entered: 09/13/2023)

09/14/2023	155	NOTICE OF ATTORNEY APPEARANCE David Raskin appearing for USA. . Attorney David Raskin added to party USA(pty:pla). (Raskin, David) (Entered: 09/14/2023)
09/14/2023	156	NOTICE OF ATTORNEY APPEARANCE Brett Reynolds appearing for USA. . Attorney Brett Reynolds added to party USA(pty:pla). (Reynolds, Brett) (Entered: 09/14/2023)
09/14/2023	157	NOTICE *of Filing of CIPA Section 10 Notice* by USA as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira (Attachments: # 1 Exhibit) (Reynolds, Brett) (Entered: 09/14/2023)
09/14/2023	158	STATUS REPORT *Joint Discovery Report* by USA as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira (Bratt, Jay) (Entered: 09/14/2023)
09/18/2023	159	NOTICE *of Filing* by USA as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira (Attachments: # 1 Exhibit, # 2 Exhibit) (Reynolds, Brett) (Entered: 09/18/2023)
09/22/2023	160	MOTION For A Revised Schedule For Motions To Compel And CIPA § 4 Litigation by Donald J. Trump. Responses due by 10/6/2023 (Kise, Christopher) (Entered: 09/22/2023)
09/25/2023	161	PAPERLESS ORDER granting in part Special Counsel's 97 123 Motions for *Garcia* Hearings. The Court will hold two separate *Garcia* hearings on October 12, 2023, in the Fort Pierce Division. Defendant Carlos De Oliveira's hearing will commence at 1:00 P.M. Defendant Waltine Nauta's hearing will commence at 3:00 P.M. Defendants De Oliveira and Nauta, associated defense counsel, and attorneys for the Office of Special Counsel must be present. The potential witnesses identified in the Special Counsel's 97 123 Motions need not appear. The Office of Special Counsel shall be prepared to articulate the nature and scope of the potential conflicts identified in its 97 123 Motions, along with any evidence in support. Defendants shall be prepared to respond. At its discretion, the Court may elect to hold a portion of each hearing sealed and *ex parte* to protect privileged communications. References during the hearing to the identified potential witnesses are to be made in accordance with the witness designations as stated in the Motions 97 123 . The remainder of the Special Counsel's 97 123 Motions are denied without prejudice. Signed by Judge Aileen M. Cannon on 9/25/2023. (kts) (Entered: 09/25/2023)
09/27/2023	165	RESPONSE in Opposition by USA as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira re 160 MOTION For A Revised Schedule For Motions To Compel And CIPA § 4 Litigation Replies due by 10/4/2023. (Edelstein, Julie) (Entered: 09/27/2023)
10/03/2023	166	SPEEDY TRIAL REPORT *Fifth Speedy Trial Report* by USA as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira (Bratt, Jay) (Entered: 10/03/2023)
10/04/2023	167	REPLY TO RESPONSE to Motion by Donald J. Trump re 160 MOTION For A Revised Schedule For Motions To Compel And CIPA § 4 Litigation (Kise, Christopher) (Entered: 10/04/2023)
10/06/2023	168	PAPERLESS ORDER temporarily staying CIPA § 4 deadlines 83 pending consideration and resolution of Defendants' Motion for a Revised Schedule for Motions to Compel and CIPA § 4 Litigation 160 and the Supplemental Briefs on CIPA §§ 3 and 4 162 163 164 . Signed by Judge Aileen M. Cannon on 10/6/2023. (kts) (Entered: 10/06/2023)
10/06/2023		SYSTEM ENTRY - Docket Entry 169 restricted/sealed until further notice. (amb) (Entered: 10/06/2023)
10/06/2023		SYSTEM ENTRY - Docket Entry 170 restricted/sealed until further notice. (amb) (Entered: 10/06/2023)
10/06/2023		SYSTEM ENTRY - Docket Entry 171 restricted/sealed until further notice. (jmd) (Entered: 10/06/2023)

10/06/2023	172	Supplemental RESPONSE to Standing Discovery Order by USA as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira (Edelstein, Julie) (Entered: 10/06/2023)
10/09/2023	173	RESPONSE in Opposition by USA as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira re 160 MOTION For A Revised Schedule For Motions To Compel And CIPA § 4 Litigation *Government's Opposition to Defendants' Motion for Adjournment of Trial Date* Replies due by 10/16/2023. (Bratt, Jay) (Entered: 10/09/2023)
10/10/2023	174	MOTION to Appear Pro Hac Vice, Consent to Designation, and Request to Electronically Receive Notices of Electronic Filing for Emil Bove. Filing Fee $ 200.00. Receipt # AFLSDC-16981314 by Donald J. Trump. Responses due by 10/24/2023 (Attachments: # 1 Certification, # 2 Text of Proposed Order)(Kise, Christopher) (Entered: 10/10/2023)
10/10/2023	175	MOTION To Intervene And Be Heard On Closure Of The Courtroom During The Oct. 12, 2023 Garcia Hearings by USA Today, The Palm Beach Post, WPLG, Inc., Univision Networks & Studios, Inc., Telemundo Network Group LLC, Sun-Sentinel Company, LLC, Radio Television Digital News Association, Orlando Sentinel Media Group, National Cable Satellite Corporation, The McClatchy Company, LLC, Insider Inc., Guardian News & Media Limited, Fort Myers Broadcasting Company, WP Company LLC, TEGNA Inc., Reuters News & Media Inc., POLITICO LLC, The New York Times Company, NBC Universal Media, LLC, National Public Radio, Inc., Los Angeles Times Communications LLC, Gray Media Groups, Inc., The E.W. Scripps Company, Dow Jones & Company, Inc., Cox Enterprises, Inc., CBS Broadcasting, Inc., Bloomberg L.P., The Associated Press, American Broadcasting Companies, Inc., Advance Publications, Inc., Cable News Networks, Inc., CMG Media Corporation as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira. Responses due by 10/24/2023 (Tobin, Charles) (Entered: 10/10/2023)
10/10/2023		Attorney update in case as to Donald J. Trump. Attorney Emil Bove for Donald J. Trump added (pt) (Entered: 10/10/2023)
10/11/2023	176	PAPERLESS ORDER granting 174 the Motion to Appear *Pro Hac Vice*, Consents to Designation, and Requests to Electronically Receive Notices of Electronic Filing for Attorney Emil Bove. The Court reserves the power to withdraw permission for special appearance at any time. Failure to abide by any court order or failure to appear at any scheduled matter may result in immediate revocation of counsel's *pro hac vice* status. Local counsel must be ready to adequately represent the party at any time. Signed by Judge Aileen M. Cannon on 10/11/2023. (mys) (Entered: 10/11/2023)
10/11/2023	177	PAPERLESS ORDER: The Court is in receipt of the Movant Press Coalition's 175 Motion to Intervene and be Heard on Possible Limited Closure of the Courtroom during the October 12, 2023, *Garcia* Hearings. Upon review of the Motion, the Court determines as follows. Should a basis arise to warrant consideration of a temporary closure of the courtroom to protect confidential attorney-client communications, Movant, through counsel, will be given an opportunity to be heard prior to any decision on closure. Accordingly, on or before 9:00 A.M. on October 12, 2023, designated counsel shall file a Notice on the docket specifying the name of the singular counsel to deliver any such presentation. Insofar as the Press Coalition's Motion seeks relief beyond an opportunity to be heard in the event of a possible limited closure, any such broader request for relief is denied. Signed by Judge Aileen M. Cannon on 10/11/2023. (mys) (Entered: 10/11/2023)
10/11/2023	178	REPLY TO RESPONSE to Motion by Donald J. Trump re 160 MOTION For A Revised Schedule For Motions To Compel And CIPA § 4 Litigation *And Motion For Adjournment Of The Trial Date* (Kise, Christopher) (Entered: 10/11/2023)
10/11/2023	179	NOTICE *of Counsel Appearing on Behalf of Press Coalition for October 12, 2023 Hearing* by USA Today, The Palm Beach Post, WPLG, Inc., Univision Networks &

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		Studios, Inc., Telemundo Network Group LLC, Sun-Sentinel Company, LLC, Radio Television Digital News Association, Orlando Sentinel Media Group, National Cable Satellite Corporation, The McClatchy Company, LLC, Insider Inc., Guardian News & Media Limited, Fort Myers Broadcasting Company, WP Company LLC, TEGNA Inc., Reuters News & Media Inc., POLITICO LLC, The New York Times Company, NBC Universal Media, LLC, National Public Radio, Inc., Los Angeles Times Communications LLC, Gray Media Groups, Inc., The E.W. Scripps Company, Dow Jones & Company, Inc., Cox Enterprises, Inc., CBS Broadcasting, Inc., Bloomberg L.P., The Associated Press, American Broadcasting Companies, Inc., Advance Publications, Inc., Cable News Networks, Inc., CMG Media Corporation as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira re 177 Order,,, (Fugate, Rachel) (Entered: 10/11/2023)
10/11/2023	180	PAPERLESS ORDER clarifying Movant Press Coalition's 179 Notice of Attorney Appearance. The Court has not authorized intervention in this proceeding or otherwise acted upon Movant's Motion to Intervene except to the extent reflected in the Court's prior Order permitting designated counsel to be heard if, and only if, a basis arises during the October 12, 2023, public hearing to close the courtroom temporarily to protect confidential attorney-client communications 177 . To the extent the Notice 179 suggests that Movant has been given intervenor status or that such an opportunity to be heard necessarily will arise, the Notice is hereby narrowed in that respect. Signed by Judge Aileen M. Cannon on 10/11/2023. (mys) (Entered: 10/11/2023)
10/15/2023	183	MOTION for Extension of Time of Deadline for Discovery Requests and Motions to Compel by Donald J. Trump. Responses due by 10/30/2023 (Kise, Christopher) (Entered: 10/15/2023)
10/16/2023	184	Supplemental RESPONSE to Standing Discovery Order by USA as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira (Edelstein, Julie) (Entered: 10/16/2023)
10/16/2023	187	Memorandum in Opposition by USA as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira re 183 MOTION for Extension of Time of Deadline for Discovery Requests and Motions to Compel Replies due by 10/23/2023. (Bratt, Jay) (Entered: 10/16/2023)
10/17/2023	188	PAPERLESS ORDER: The parties are advised that production of classified discovery to defense counsel is deemed timely upon placement in an accredited facility in the Southern District of Florida, not in another federal district. It is the responsibility of the Office of the Special Counsel to make and carry out arrangements to deposit such discovery to defense counsel in this District, in consultation with the Litigation Security Group for security purposes. The Office of the Special Counsel shall update and/or clarify any prior responses to the Standard Discovery Order in accordance with this Order. Signed by Judge Aileen M. Cannon on 10/17/2023. (AMC) (Entered: 10/17/2023)
10/18/2023	189	SUPPLEMENT by USA as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira *Supplement to Garcia Motion* (Pellettieri, John) (Entered: 10/18/2023)
10/19/2023	190	Supplemental RESPONSE to Standing Discovery Order by USA as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira (Edelstein, Julie) (Entered: 10/19/2023)
10/19/2023	191	Reply by Donald J. Trump to 190 Response to Standing Discovery Order (Kise, Christopher) (Entered: 10/19/2023)
10/19/2023	192	PAPERLESS NOTICE SCHEDULING HEARING on pending scheduling Motions 160 183 for November 1, 2023, at 1:00 P.M. in the Fort Pierce Division. Defense counsel and attorneys for the Office of Special Counsel must be present. The October 2023 deadlines set forth in the Court's Scheduling Order 83 are temporarily stayed pending this hearing and further Court order. Signed by Aileen M. Cannon on 10/19/2023. (jf01) (Entered: 10/19/2023)

10/24/2023	195	SPEEDY TRIAL REPORT *Sixth Speedy Trial Report* by USA as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira (Bratt, Jay) (Entered: 10/24/2023)
10/24/2023	196	PAPERLESS ORDER denying as moot Movant Press Coalition's 175 Motion to Intervene and be Heard on Possible Limited Closure of the Courtroom during *Garcia* Hearings. The hearings were held publicly 181 194 . Signed by Judge Aileen M. Cannon on 10/24/2023. (jf01) (Entered: 10/24/2023)
10/25/2023	197	NOTICE OF ATTORNEY APPEARANCE Anne McNamara appearing for USA. . Attorney Anne McNamara added to party USA(pty:pla). (McNamara, Anne) (Entered: 10/25/2023)
10/26/2023	199	Supplemental RESPONSE to Standing Discovery Order by USA as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira (Edelstein, Julie) (Entered: 10/26/2023)
10/30/2023	200	Unopposed MOTION for Remote Appearance by Donald J. Trump. Responses due by 11/13/2023 (Kise, Christopher) (Entered: 10/30/2023)
10/31/2023	201	PAPERLESS ORDER granting Unopposed Motion for Telephonic Appearance by Co-Counsel Christopher Kise Due to Trial Conflict 200 . Remaining counsel to appear in person. Signed by Judge Aileen M. Cannon on 10/31/2023. (mys) (Entered: 10/31/2023)
11/01/2023	202	ORDER Following CIPA Section 3 Supplemental Briefing. Signed by Judge Aileen M. Cannon on 11/1/2023. *See attached document for full details*. (mys) (Entered: 11/01/2023)
11/02/2023	203	NOTICE *of Filing in District of Columbia* by USA as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira (Attachments: # 1 Exhibit) (Bratt, Jay) (Entered: 11/02/2023)
11/02/2023	204	Supplemental RESPONSE to Standing Discovery Order by USA as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira (Edelstein, Julie) (Entered: 11/02/2023)
11/03/2023	205	PAPERLESS Minute Entry for proceedings held before Judge Aileen M. Cannon: Hearing held on November 1, 2023. The Court heard argument from the parties on Defendants' pending motions to continue 160 167 183 . Pre-trial deadlines temporarily stayed pending order to follow. Total time in court: 1 hour, 38 minutes. Attorney Appearances: Jay I. Bratt, David Harbach, John M. Pellettieri, Michael Thakur, John S. Irving, Larry Donald Murrell, Jr., Todd Blanche, Emil Bove, Christopher Michael Kise (telephonic), Sasha Dadan, Stanley E. Woodward. Court Reporter: Diane Miller, 772-467-2337 / Diane_Miller@flsd.uscourts.gov. (mys) (Entered: 11/03/2023)
11/03/2023	206	PAPERLESS ORDER ON NOTICES: The parties are hereby reminded of the requirements of Local Rule 7.8 on Notices of Supplemental Authority. Except as authorized by Court order, the substantive content of any such notice (or response) may not exceed 200 words and may not be used as a surreply absent leave of Court. Future non-compliant notices or unauthorized filings will be stricken without further notice. Signed by Judge Aileen M. Cannon on 11/3/2023. (AMC) (Entered: 11/03/2023)
11/03/2023		SYSTEM ENTRY - Docket Entry 207 restricted/sealed until further notice. (tci) (Entered: 11/03/2023)
11/03/2023	208	MOTION for Disclosure *of Advice of Counsel Defense* by USA as to Donald J. Trump. Responses due by 11/17/2023 (Harbach, David) (Entered: 11/03/2023)
11/08/2023	209	TRANSCRIPT of Pretrial/Scheduling Hearing as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira held on 7/18/2023 before Judge Aileen M. Cannon, 1-83 pages, Court Reporter: Diane Miller, 772-467-2337 / Diane_Miller@flsd.uscourts.gov. Transcript may be viewed at the court public terminal or purchased by contacting the Court Reporter/Transcriber before the deadline for Release of Transcript Restriction. After that

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		date it may be obtained through PACER. Redaction Request due 11/29/2023. Redacted Transcript Deadline set for 12/11/2023. Release of Transcript Restriction set for 2/6/2024. (dmr) (Entered: 11/08/2023)
11/08/2023	210	TRANSCRIPT of Arraignment Hearing as to Donald J. Trump, Waltine Nauta, held on 8/10/2023 before Magistrate Judge Shaniek Mills Maynard, 1-12 pages, Court Reporter: Diane Miller, 772-467-2337 / Diane_Miller@flsd.uscourts.gov. Transcript may be viewed at the court public terminal or purchased by contacting the Court Reporter/Transcriber before the deadline for Release of Transcript Restriction. After that date it may be obtained through PACER. Redaction Request due 11/29/2023. Redacted Transcript Deadline set for 12/11/2023. Release of Transcript Restriction set for 2/6/2024. (dmr) (Entered: 11/08/2023)
11/08/2023	211	TRANSCRIPT of Garcia Hearing as to Waltine Nauta held on 10/20/23 before Judge Aileen M. Cannon, 1-44 pages, Court Reporter: Diane Miller, 772-467-2337 / Diane_Miller@flsd.uscourts.gov. Transcript may be viewed at the court public terminal or purchased by contacting the Court Reporter/Transcriber before the deadline for Release of Transcript Restriction. After that date it may be obtained through PACER. Redaction Request due 11/29/2023. Redacted Transcript Deadline set for 12/11/2023. Release of Transcript Restriction set for 2/6/2024. (dmr) (Entered: 11/08/2023)
11/09/2023		SYSTEM ENTRY - Docket Entry 212 restricted/sealed until further notice. (amb) (Entered: 11/09/2023)
11/10/2023	215	ORDER GRANTING IN PART DEFENDANTS' MOTIONS TO CONTINUE PRETRIAL DEADLINES 160 183 AND DENYING WITHOUT PREJUDICE MOTION TO ADJOURN TRIAL 167 . Signed by Judge Aileen M. Cannon on 11/10/2023. *See attached document for full details*. (AMC) (Entered: 11/10/2023)
11/10/2023		Set/Reset Deadlines/Hearings per order de 215 as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira: Motions due by 2/22/2024. Status Report due by 1/9/2024. Scheduling Conference set for 3/1/2024 before Judge Aileen M. Cannon. (drz) (Entered: 11/13/2023)
11/13/2023	216	Unopposed MOTION to Reschedule Hearing on CIPA § 4 Motions by Donald J. Trump. Responses due by 11/27/2023 (Kise, Christopher) (Entered: 11/13/2023)
11/14/2023	217	SPEEDY TRIAL REPORT *Seventh Speedy Trial Report* by USA as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira (Bratt, Jay) (Entered: 11/14/2023)
11/14/2023	218	TRANSCRIPT of Motions Hearing as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira held on 11/1/2023 before Judge Aileen M. Cannon, 1-78 pages, Court Reporter: Diane Miller, 772-467-2337 / Diane_Miller@flsd.uscourts.gov. Transcript may be viewed at the court public terminal or purchased by contacting the Court Reporter/Transcriber before the deadline for Release of Transcript Restriction. After that date it may be obtained through PACER. Redaction Request due 12/5/2023. Redacted Transcript Deadline set for 12/15/2023. Release of Transcript Restriction set for 2/12/2024. (dmr) (Entered: 11/14/2023)
11/15/2023	219	MOTION for Disclosure *Motion for CIPA Section 5 Notification* by USA as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira. Responses due by 11/29/2023 (Bratt, Jay) (Entered: 11/15/2023)
11/16/2023	220	PAPERLESS ORDER granting Defendant Trump's 216 Unopposed Motion to Reschedule Hearing on CIPA Section 4 Motions. The CIPA Section 4 Motion Hearing currently scheduled for February 15-16, 2024 215 is rescheduled for February 12-13, 2024. Signed by Judge Aileen M. Cannon on 11/16/2023. (jf01) (Entered: 11/16/2023)

11/16/2023	221	PAPERLESS ORDER denying without prejudice 219 Motion for CIPA Section 5 Notification. As stated in the Court's November 10, 2023, Order 215 , "[a]ll previously remaining deadlines in the Court's July 21, 2023, Order are superseded except calendar call and trial." The Court "reset[] the first set of pre-trial deadlines" as indicated on pages 8 and 9 of that Order 215 and scheduled a conference on March 1, 2024, "to address remaining deadlines." To the extent the Special Counsel's motion seeks reconsideration in part of the Court's November 10, 2023, Order 215 , that request is denied. CIPA Section 5 deadlines, and all other pre-trial deadlines not included in the first batch of pre-trial deadlines contained in the Court's revised schedule 215 , will be set following the March 1, 2024, scheduling conference. Signed by Judge Aileen M. Cannon on 11/16/2023. (jf01) (Entered: 11/16/2023)
11/22/2023	222	*Unsealed* MOTION TO FILE GOVERNMENT'S EX PARTE MOTION TO EXCEED PAGE LIMITS UNDER SEAL. (Attachments: # 1 Proposed Order) (amb) Modified on 12/1/2023 to Unseal, per Order DE #228. (jmd) (Entered: 11/22/2023)
11/22/2023	223	EX PARTE MOTION TO EXCEED PAGE LIMITS filed by The Government. (Attachments: # 1 Proposed Order) (amb) Modified to Unseal per DE 231 on 12/4/2023 (amb). (Entered: 11/22/2023)
11/27/2023	224	SEALED EX PARTE ORDER denying without prejudice 222 Sealed Motion as to Donald J. Trump (1), Waltine Nauta (2), Carlos De Oliveira (3); denying without prejudice 223 Sealed Motion as to Donald J. Trump (1), Waltine Nauta (2), Carlos De Oliveira (3). Miscellaneous Deadline 11/29/2023. Signed by Judge Aileen M. Cannon on 11/27/2023. *See attached document for full details*. (jmd) Modified to Unseal per DE 231 on 12/4/2023 (amb). (Entered: 11/28/2023)
11/29/2023	225	*Unsealed* CONSENT MOTION TO EXCEED PAGE LIMITS filed by The Government. (amb) Modified on 12/1/2023 to Unseal, per Order DE #228. (jmd) (Entered: 11/29/2023)
11/29/2023	226	*Unsealed* Sealed Order Granting in Part SEALED Consent Motion to Exceed Page Limits as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira and resetting Government CIPA Section 4 Motions to 12/06/2023. Signed by Judge Aileen M. Cannon on 11/29/2023. (tci) Modified on 12/1/2023 to Unseal, per Order DE #228. (jmd) (Entered: 11/29/2023)
11/30/2023	227	Consent MOTION to Unseal Docket Entries 222 , 223 , 224 , 225 , 226 by Waltine Nauta as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira. Responses due by 12/14/2023 (Attachments: # 1 Text of Proposed Order)(Dadan, Sasha) (Entered: 11/30/2023)
12/01/2023	228	PAPERLESS ORDER: The Court is in receipt of Defendants' 227 Motion to Unseal and the Special Counsel's position on the Motion as reflected therein. Upon review, Defendants' Motion is granted in part as follows. The Clerk is directed to unseal docket entries 222, 225, and 226. On or before December 1, 2023, the Special Counsel shall (1) transmit unredacted copies of docket entries 223 and 224 to Defendants, and (2) file under seal but not *ex parte* a response to Defendants' Motion, justifying and specifying its request for any limited redactions of docket entries 223 and 224 in light of the strong presumption in favor of public access to judicial documents. As a final matter, Defendants' unopposed request for a two-day extension of time within which to file any defense motion related to the *ex parte* nature of CIPA Section 4 is granted, to December 6, 2023. Signed by Judge Aileen M. Cannon on 12/1/2023. (jmd) (Entered: 12/01/2023)
12/01/2023	229	CLERK'S NOTICE of Compliance re 228 Order on Motion to Unseal. (jmd) (Entered: 12/01/2023)

12/01/2023	230	RESPONSE to the Court's December 1, 2023 Order by USA as to all Defendants. (kpe) Modified to Unseal per DE 231 on 12/4/2023 (amb). (Entered: 12/01/2023)
12/04/2023	231	PAPERLESS ORDER: In light of the Special Counsel's Response to Defendants' Motion to Unseal 230 , and mindful of the strong presumption in favor of public access to judicial documents, the Clerk is directed to unseal docket entries 223, 224, and 230. Signed by Judge Aileen M. Cannon on 12/4/2023. (jf01) (Entered: 12/04/2023)
12/04/2023	232	NOTICE of Compliance re 231 Order. (DE's 223, 224 and 230 Unsealed) (amb) Text Modified on 12/4/2023 (amb). (Entered: 12/04/2023)
12/05/2023	233	SPEEDY TRIAL REPORT *Eighth Speedy Trial Report* by USA as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira (Bratt, Jay) (Entered: 12/05/2023)
12/06/2023	235	Supplemental RESPONSE to Standing Discovery Order by USA as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira (Edelstein, Julie) (Entered: 12/06/2023)
12/06/2023	236	NOTICE *of Filing of CIPA Section 4 Motions* by USA as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira (Attachments: # 1 Exhibit) (Edelstein, Julie) (Entered: 12/06/2023)
12/06/2023	237	MOTION For Access to CIPA § 4 Filings by Donald J. Trump. Responses due by 12/20/2023 (Attachments: # 1 Exhibit, # 2 Exhibit, # 3 Exhibit)(Kise, Christopher) (Entered: 12/06/2023)
12/19/2023	240	MOTION for Written Jury Questionnaire by USA as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira. Responses due by 1/2/2024 (Bratt, Jay) (Entered: 12/19/2023)
12/20/2023	241	RESPONSE in Opposition by USA as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira re 238 MOTION for Access to CIPA § 4 Filings re 236 Notice (Other) , 237 MOTION For Access to CIPA § 4 Filings Replies due by 12/27/2023. (Edelstein, Julie) (Entered: 12/20/2023)
12/20/2023	242	Memorandum in Opposition by Donald J. Trump re 240 MOTION for Written Jury Questionnaire Replies due by 12/27/2023. (Kise, Christopher) (Entered: 12/20/2023)
12/21/2023	243	REPLY TO RESPONSE to Motion by USA as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira re 240 MOTION for Written Jury Questionnaire (Bratt, Jay) (Entered: 12/21/2023)
12/22/2023	244	PAPERLESS ORDER granting in part Special Counsel's 240 Motion for Written Jury Questionnaire. **On or before February 28, 2024,** the parties shall meaningfully confer and file a joint jury questionnaire for the Court's consideration, clearly denoting any areas of agreement and disagreement. The Court reserves ruling on the specific process by which questionnaires will be transmitted/completed. Nothing in this Order shall be construed as modifying the instructions and deadlines set forth in the Court's Operative Scheduling Orders 215 221 . Signed by Judge Aileen M. Cannon on 12/22/2023. (jf01) (Entered: 12/22/2023)
12/26/2023	245	SPEEDY TRIAL REPORT *Ninth Speedy Trial Report* by USA as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira (Bratt, Jay) (Entered: 12/26/2023)
12/27/2023	246	REPLY TO RESPONSE to Motion by Donald J. Trump re 237 MOTION For Access to CIPA § 4 Filings (Kise, Christopher) (Entered: 12/27/2023)
12/29/2023	248	RESPONSE in Opposition by Donald J. Trump re 208 MOTION for Disclosure *of Advice of Counsel Defense* Replies due by 1/5/2024. (Kise, Christopher) (Entered: 12/29/2023)
01/03/2024	249	MOTION Bring Electronic Devices into the Courthouse by Waltine Nauta as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira. Responses due by 1/17/2024 (Attachments: #

	1 Text of Proposed Order)(Dadan, Sasha) (Entered: 01/03/2024)	
01/04/2024	250	ORDER granting 249 Motion to Bring Electronic Equipment into the Courthouse as to Defendants Donald J. Trump and Waltine Nauta. Signed by Judge Aileen M. Cannon on 1/4/2024. *See attached document for full details*. (tci) (Entered: 01/04/2024)
01/05/2024	251	REPLY TO RESPONSE to Motion by USA as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira re 208 MOTION for Disclosure *of Advice of Counsel Defense* (Harbach, David) (Entered: 01/05/2024)
01/09/2024	252	STATUS REPORT *Joint Discovery Status Report* by USA as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira (Edelstein, Julie) (Entered: 01/09/2024)
01/11/2024	253	Supplemental RESPONSE to Standing Discovery Order by USA as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira (Edelstein, Julie) (Entered: 01/11/2024)
01/11/2024	254	PAPERLESS ORDER: In advance of the upcoming CIPA § 4 Hearings 215 220 , and to assist in the Court's evaluation of Defendants' Motions for Access to CIPA § 4 Filings 237 238 , the Court hereby schedules a hearing with the Special Counsel on January 31, 2024, at 10:00 A.M. This hearing shall be conducted on a sealed, ex parte basis in a facility suitable for the discussion of classified information contained in the Special Counsel's Section 4 Filings 236 . The Court reserves ruling on Defendants' Motions for Access to CIPA § 4 Filings pending the February 2024 CIPA § 4 hearings and review of Defendants' forthcoming CIPA § 4 challenges. Signed by Judge Aileen M. Cannon on 1/11/2024.(tci) (Entered: 01/11/2024)
01/12/2024	255	Consent MOTION for Leave to File Excess Pages by Donald J. Trump. Responses due by 1/26/2024. (Kise, Christopher) (Entered: 01/12/2024)
01/12/2024	256	NOTICE *of Filing of Government's Classified Notice of Expert Testimony* by USA as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira (Attachments: # 1 Exhibit) (Reynolds, Brett) (Entered: 01/12/2024)
01/12/2024	257	NOTICE *of Expert Witnesses* by USA as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira (Attachments: # 1 Exhibit Attachment A, # 2 Exhibit Attachment B, # 3 Exhibit Attachment C, # 4 Exhibit Attachment D, # 5 Exhibit Attachment E, # 6 Exhibit Attachment F) (Thakur, Michael) (Entered: 01/12/2024)
01/12/2024	258	PAPERLESS ORDER granting Defendants' 255 Consent Motion for Leave to File Oversized Consolidated Brief in Support of Motions to Compel. Defendants may file one consolidated classified brief and one consolidated unclassified brief, neither to exceed 120 double-spaced pages using 12-point font. The Special Counsel is granted corresponding relief for its combined responses. This Order construes Defendants' 255 Consent Motion as applied to all Defendants filing jointly. To the extent the Consent Motion requests otherwise, the parties shall comply with the Local Rules. Signed by Judge Aileen M. Cannon on 1/12/2024. (jf01) (Entered: 01/12/2024)
01/12/2024	259	PAPERLESS ORDER denying without prejudice Special Counsel's Motion to Compel Disclosure Regarding Advice-of-Counsel Defense 208 . The Court has reviewed the Motion, Defendants' Opposition 248 , the Special Counsel's Reply 251 , and is fully advised in the premises. Assuming the facts and circumstances in this case warrant an order compelling disclosure of an advice-of-counsel trial defense, the Court determines that such a request is not amenable to proper consideration at this juncture, prior to at least partial resolution of pre-trial motions, transmission to Defendants of the Special Counsel's exhibit and witness lists, and other disclosures as may become necessary. The Special Counsel's Motion 208 is therefore denied without prejudice. Signed by Judge Aileen M. Cannon on 1/12/2024. (jf01) (Entered: 01/12/2024)

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01/16/2024	260	SPEEDY TRIAL REPORT *Tenth Speedy Trial Report* by USA as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira (Bratt, Jay) (Entered: 01/16/2024)
01/16/2024	261	MOTION For Temporary Leave to File Redacted Brief by Donald J. Trump. Responses due by 1/30/2024. (Kise, Christopher) (Additional attachment(s) added on 1/16/2024: # 1 Unredacted Copy of Motion) (wc). (Entered: 01/16/2024)
01/16/2024	262	MOTION to Compel *Discovery* by Donald J. Trump. Responses due by 1/30/2024. (Attachments: # 1 Exhibit)(Kise, Christopher) (Additional attachment(s) added on 1/16/2024: # 2 Unredacted Motion and Exhibits) (wc). (Entered: 01/16/2024)
01/17/2024	263	NOTICE *of Filing* by Donald J. Trump (Attachments: # 1 Exhibit) (Kise, Christopher) (Entered: 01/17/2024)
01/17/2024	264	NOTICE *of Filing* by Donald J. Trump (Attachments: # 1 Exhibit) (Kise, Christopher) (Entered: 01/17/2024)
01/17/2024	265	PAPERLESS ORDER: The Court is in receipt of Defendant Trump's Notice of CIPA § 4 Challenge 264 , dated January 17, 2024. **On or before January 18, 2024**, Defendant Trump shall file a Notice confirming the non-ex parte nature of this defense filing. Signed by Judge Aileen M. Cannon on 1/17/2024. (jf01) (Entered: 01/17/2024)
01/18/2024	266	NOTICE *of Non-Ex Parte Filing* by Donald J. Trump (Kise, Christopher) (Entered: 01/18/2024)
01/18/2024	267	RESPONSE to Motion by USA as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira re 262 MOTION to Compel *Discovery* . Replies due by 1/25/2024. (amb) (Entered: 01/18/2024)
01/18/2024		SYSTEM ENTRY - Docket Entry 268 restricted/sealed until further notice. (amb) (Entered: 01/18/2024)
01/22/2024	269	MOTION to Intervene and Unseal Defendants' Motions to Compel Discovery re 262 MOTION to Compel *Discovery* by USA Today, The Palm Beach Post, WPLG, Inc., Univision Networks & Studios, Inc., Telemundo Network Group LLC, Sun-Sentinel Company, LLC, Radio Television Digital News Association, Orlando Sentinel Media Group, National Cable Satellite Corporation, The McClatchy Company, LLC, Insider Inc., Guardian News & Media Limited, Fort Myers Broadcasting Company, WP Company LLC, TEGNA Inc., POLITICO LLC, The New York Times Company, NBC Universal Media, LLC, National Public Radio, Inc., Los Angeles Times Communications LLC, Gray Media Groups, Inc., The E.W. Scripps Company, Dow Jones & Company, Inc., Cox Enterprises, Inc., CBS Broadcasting, Inc., Bloomberg L.P., The Associated Press, American Broadcasting Companies, Inc., Advance Publications, Inc., Cable News Networks, Inc., CMG Media Corporation as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira. Responses due by 2/5/2024. (Tobin, Charles) (Entered: 01/22/2024)
01/22/2024	270	RESPONSE in Support by Donald J. Trump re 262 MOTION to Compel *Discovery* (Kise, Christopher) (Entered: 01/22/2024)
01/23/2024	271	RESPONSE in Opposition by Donald J. Trump re 269 MOTION to Intervene and Unseal Defendants' Motions to Compel Discovery re 262 MOTION to Compel *Discovery* Replies due by 1/30/2024. (Kise, Christopher) (Entered: 01/23/2024)
01/26/2024	273	Supplemental RESPONSE to Standing Discovery Order by USA as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira (Edelstein, Julie) (Entered: 01/26/2024)
01/30/2024	274	NOTICE OF ATTORNEY APPEARANCE J.P. Cooney appearing for USA. . Attorney J.P. Cooney added to party USA(pty:pla). (Cooney, J.P.) (Entered: 01/30/2024)

01/30/2024	275	NOTICE *of Filing* by USA as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira (Attachments: # 1 Exhibit) (Reynolds, Brett) (Entered: 01/30/2024)
01/31/2024	276	PAPERLESS Minute Entry for sealed, ex parte proceeding held before Judge Aileen M. Cannon on January 31, 2024. The Court heard argument from the Special Counsel on its CIPA § 4 Motions 236 . Total time in court: 3 hours. Attorney Appearances: Jay I. Bratt, David Harbach, Julie A. Edelstein, J.P. Cooney. Court Reporter: Pauline Stipes, 561-803-3434 / Pauline_Stipes@flsd.uscourts.gov.(tci) (Entered: 01/31/2024)
02/02/2024	277	RESPONSE in Opposition by USA as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira re 262 MOTION to Compel *Discovery* Replies due by 2/9/2024. (Attachments: # 1 Exhibit A, # 2 Exhibit B, # 3 Exhibit C, # 4 Exhibit D, # 5 Exhibit E, # 6 Exhibit F, # 7 Exhibit G) (Harbach, David) (Entered: 02/02/2024)
02/02/2024	278	*Unsealed* MOTION for Permission to File Sealed and Redacted Documents by USA as all Defendants. (kpe) Modified on 2/7/2024 re: Unsealed, pursuant to Order at DE # 286 . (jmd) (Entered: 02/02/2024)
02/02/2024		SYSTEM ENTRY - Docket Entry 279 restricted/sealed until further notice. (kpe) (Entered: 02/02/2024)
02/02/2024	280	NOTICE *of Filing of Classified Opposition* by USA as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira (Attachments: # 1 Exhibit Unclassified Cover Sheet) (Bratt, Jay) (Entered: 02/02/2024)
02/05/2024	281	SCHEDULING ORDER on CIPA § 4 Hearings as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira. Signed by Judge Aileen M. Cannon on 2/5/2024. *See attached document for full details*. (jf01) (Entered: 02/05/2024)
02/05/2024	282	RESPONSE to Motion by USA as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira re 269 MOTION to Intervene and Unseal Defendants' Motions to Compel Discovery re 262 MOTION to Compel *Discovery* Replies due by 2/12/2024. (Bratt, Jay) (Entered: 02/05/2024)
02/06/2024	283	ORDER granting in part Defendants' Motion for Temporary Leave to File Redacted Motions 261 and denying as moot Press Coalition's Motion to Intervene and Unseal 269 . Signed by Judge Aileen M. Cannon on 2/6/2024. *See attached document for full details*. (jf01) (Entered: 02/06/2024)
02/06/2024	284	SPEEDY TRIAL REPORT *Eleventh Speedy Trial Report* by USA as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira (Bratt, Jay) (Entered: 02/06/2024)
02/06/2024	285	MOTION for Adjournment of Certain Pretrial Motion Deadlines by Donald J. Trump. Responses due by 2/20/2024. (Kise, Christopher) (Entered: 02/06/2024)
02/07/2024	286	ORDER granting in part Special Counsel's 278 Sealed Motion for Permission to File Sealed and Redacted Documents. Signed by Judge Aileen M. Cannon on 2/7/2024. *See attached document for full details*. (jf01) (Entered: 02/07/2024)
02/07/2024	287	CLERK'S NOTICE of Compliance re 286 Order on Motion and to Unseal DE # 278 . (jmd) (Entered: 02/07/2024)
02/07/2024	289	MOTION for Leave to File *Exhibit Ex Parte and Under Seal* by USA as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira. Responses due by 2/21/2024. (Attachments: # 1 Text of Proposed Order)(Harbach, David) (Entered: 02/07/2024)
02/08/2024	290	NOTICE *of Filing of CIPA Section 4 Supplement* by USA as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira (Attachments: # 1 Exhibit) (Edelstein, Julie) (Entered: 02/08/2024)

02/08/2024	291	Supplemental RESPONSE to Standing Discovery Order by USA as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira (Edelstein, Julie) (Entered: 02/08/2024)
02/08/2024	292	RESPONSE in Opposition by USA as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira re 285 MOTION for Adjournment of Certain Pretrial Motion Deadlines Replies due by 2/15/2024. (Bratt, Jay) (Entered: 02/08/2024)
02/08/2024	293	PAPERLESS ORDER granting the Special Counsel's Motion for Leave to File Exhibit Ex Parte and Under Seal 289 . The Motion is granted insofar as it seeks leave to file the subject exhibit under seal, for the reasons stated in the Motion. The Motion is also temporarily granted as to the ex parte nature of the request, pending the Court's in camera review of the exhibit. On or before February 9, 2024, the Special Counsel shall submit the subject document to the Court under seal and ex parte. Signed by Judge Aileen M. Cannon on 2/8/2024. (jf01) (Entered: 02/08/2024)
02/08/2024	294	MOTION for Reconsideration re 286 Order on Sealed Motion, 283 Order on Motion for Miscellaneous Relief,,, by USA as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira. Responses due by 2/22/2024. (Attachments: # 1 Appendix 1, # 2 Exhibit A) (Harbach, David) (Entered: 02/08/2024)
02/09/2024	295	PAPERLESS ORDER: On or before February 23, 2024, Defendants shall file a response to the Special Counsel's Motion for Reconsideration 294 . S.D. Fla. L.R. 7.1(c)(1). The deadlines established in the Court's prior Orders 283 286 are temporarily stayed pending resolution of the Special Counsel's Motion. To the extent this Order impacts Defendants' forthcoming Reply in Support of Motions to Compel 262 , Defendants shall advise the Court by filing a Notice no later than 3:00 p.m. on February 9, 2024. The parties are advised to adhere to the instructions in paragraph 4 of the Court's Order [283 p. 9-10]. Signed by Judge Aileen M. Cannon on 2/9/2024. (jf01) (Entered: 02/09/2024)
02/09/2024		Reset Deadlines in case as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira 294 MOTION for Reconsideration re 286 Order on Sealed Motion, 283 Order on Motion for Miscellaneous Relief,,, . Responses due by 2/23/2024. (ls)(per DE #295) (Entered: 02/09/2024)
02/09/2024		SYSTEM ENTRY - Docket Entry 296 restricted/sealed until further notice. (amb) (Entered: 02/09/2024)
02/09/2024	297	NOTICE *re Sealing of Reply ISO 262 Mot. to Compel* by Waltine Nauta as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira re 295 Order,, (Dadan, Sasha) (Entered: 02/09/2024)
02/09/2024	298	PAPERLESS ORDER approving Defendants' Reply proposal as stated in Notice 297 . Signed by Judge Aileen M. Cannon on 2/9/2024. (jf01) (Entered: 02/09/2024)
02/09/2024	299	PAPERLESS ORDER redesignating ex parte sealed filing 296 as sealed filing only. Upon in camera review of the subject attachment, and mindful of the disfavored nature of ex parte proceedings, the Court reaffirms the Special Counsel's request to seal the attachment referenced in the Special Counsel's Motion for Leave 289 but finds an insufficient basis provided to deviate from the adversarial process in this instance. The Special Counsel is directed to transmit the exhibit to Defendants on or before February 10, 2024. The exhibit shall remain sealed pending further Court order. Signed by Judge Aileen M. Cannon on 2/9/2024. (jf01) (Entered: 02/09/2024)
02/09/2024	300	REPLY TO RESPONSE to Motion by Waltine Nauta as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira re 262 MOTION to Compel *Discovery* (Dadan, Sasha) (Entered: 02/09/2024)

02/10/2024	301	NOTICE *re Classified Reply Supplement* by Waltine Nauta as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira re 263 Notice (Other), 300 Reply to Response, 262 MOTION to Compel *Discovery* (Attachments: # 1 Exhibit Classified Supplement Cover Sheet) (Dadan, Sasha) (Entered: 02/10/2024)
02/11/2024	302	STRICKEN - MOTION for Leave to File *Surreply* by USA as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira. Responses due by 2/26/2024. (Pellettieri, John) Modified/Stricken per DE 304 on 2/13/2024 (pes). (Entered: 02/11/2024)
02/12/2024	303	Clerk's Notice to Filer re 302 MOTION for Leave to File *Surreply*. **Login/Signature Block Violation**; CORRECTIVE ACTION REQUIRED WITHIN 3 DAYS - The name of attorney e-filing this document via their CM/ECF login does not match the name of attorney on the signature block of the document. The name used for login must match typed name on signature block of the document. This filing is a violation of Section 3J(1) of CM/ECF Admin Procedures and L R 5.1(b). Filer must File a Notice of Striking, then refile document pursuant to CM/ECF Admin Procedures and Local Rules. (jas) (Entered: 02/12/2024)
02/12/2024	304	NOTICE of Striking 302 MOTION for Leave to File *Surreply* by USA as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira (Pellettieri, John) (Entered: 02/12/2024)
02/12/2024	305	MOTION for Leave to File *Surreply* by USA as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira. Responses due by 2/26/2024. (Pellettieri, John) (Entered: 02/12/2024)
02/12/2024	306	PAPERLESS ORDER clarifying CIPA § 4 hearing for February 13, 2024. Starting at 10:30 A.M., the Court will conduct a sealed hearing with the Special Counsel and cleared counsel for Defendants Nauta and De Oliveira. Cleared counsel shall be prepared to discuss the classified information produced in classified discovery in the context of the "relevant and helpful" standard and the mens rea applicable to Counts 33-37 and 39-42 of the Superseding Indictment 85 ; to present argument on the Special Counsel's request to withhold all of that information from Defendants Nauta and De Oliveira pursuant to CIPA § 4; and to discuss specifics with respect to the current figures of materials produced in classified discovery, including whether any of that information overlaps with unclassified discovery and/or merits clarification. This hearing will be held in a facility suitable for the discussion of classified information. Defendants Nauta and De Oliveira may not be present. Defendant Trump is not required to appear. Counsel for Defendant Trump may attend. Final CIPA § 4 ex parte session with the Special Counsel to follow the 10:30 A.M. session. Nothing in this Order should be construed as altering the current ex parte nature of the Special Counsel's CIPA § 4 filings. Signed by Judge Aileen M. Cannon on 2/12/2024. (jf01) (Entered: 02/12/2024)
02/13/2024	307	PAPERLESS Minute Entry for sealed, ex parte proceeding held before Judge Aileen M. Cannon on February 12, 2024. The Court heard argument from Defendants on their CIPA § 4 Challenges 264 272 288 and Motions for Access to CIPA § 4 Filings 237 238 . Classified information discussed. Total time in court: 3 hours 25 minutes. Attorney Appearances: Emil Bove, Todd Blanche, Christopher Kise, Stephen H. Weiss, Sasha Dadan, Stanley E. Woodward, Larry Donald Murrell, Jr., John S. Irving. Other Appearance: Former President Donald J. Trump. Court Reporter: Pauline Stipes, 561-803-3434 / Pauline_Stipes@flsd.uscourts.gov Court Reporter: Pauline Stipes, 561-803-3434 / Pauline_Stipes@flsd.uscourts.gov. (tci) (Entered: 02/13/2024)
02/13/2024	308	PAPERLESS Minute Entry for sealed, ex parte proceeding held before Judge Aileen M. Cannon on February 12, 2024. The Court heard argument from the Special Counsel on its CIPA § 4 Motions 236 and Supplement 290 . Classified information discussed. Total time in court: 2 hours. Attorney Appearances: Jay I. Bratt, David Harbach, Julie A. Edelstein, J.P. Cooney. Court Reporter: Pauline Stipes, 561-803-3434 /

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		Pauline_Stipes@flsd.uscourts.gov Court Reporter: Pauline Stipes, 561-803-3434 / Pauline_Stipes@flsd.uscourts.gov. (tci) (Entered: 02/13/2024)
02/13/2024	309	PAPERLESS Minute Entry for non-ex parte, sealed proceeding held before Judge Aileen M. Cannon on February 13, 2024. The Court heard argument from the Special Counsel and cleared counsel for Defendants Nauta and De Oliveira concerning those Defendants' access to classified materials under the "relevant and helpful" standard. Classified information discussed. Total time in court: 2 hours 15 minutes. Attorney Appearances: Jay I. Bratt, David Harbach, Julie A. Edelstein, J.P. Cooney, Emil Bove, Todd Blanche, Sasha Dadan, Stanley E. Woodward, Larry Donald Murrell, Jr., John S. Irving. Court Reporter: Pauline Stipes, 561-803-3434 / Pauline_Stipes@flsd.uscourts.gov (jf01) (Entered: 02/13/2024)
02/13/2024	310	PAPERLESS Minute Entry for sealed, ex parte proceeding held before Judge Aileen M. Cannon on February 13, 2024. The Court heard argument from the Special Counsel on its CIPA § 4 Motion as to Defendant Trump 236 and Supplement 290 . Classified information discussed. Total time in court: 55 minutes. Attorney Appearances: Jay I. Bratt, David Harbach, Julie A. Edelstein, J.P. Cooney. Court Reporter: Pauline Stipes, 561-803-3434 / Pauline_Stipes@flsd.uscourts.gov. (jf01) (Entered: 02/13/2024)
02/14/2024	311	REPLY TO RESPONSE to Motion by Donald J. Trump re 285 MOTION for Adjournment of Certain Pretrial Motion Deadlines (Kise, Christopher) (Entered: 02/14/2024)
02/15/2024	312	MOTION for Leave to File *Discovery Material* by Waltine Nauta as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira. Responses due by 2/29/2024. (Attachments: # 1 Text of Proposed Order)(Dadan, Sasha) (Entered: 02/15/2024)
02/15/2024	313	PAPERLESS ORDER: On or before February 20, 2024, Defendants shall respond to the Special Counsel's Motion for Leave to File Sur-Reply 305 . Signed by Judge Aileen M. Cannon on 2/15/2024. (tci) (Entered: 02/15/2024)
02/15/2024	314	PAPERLESS ORDER denying, with clarification, Defendants' Motion to Adjourn Pre-Trial Motions Deadlines 285 . The deadline to file pre-trial motions (as distinct from motions in limine seeking the exclusion of specific evidence/arguments from being presented during trial) remains February 22, 2024. However, to the extent the Court's resolution of the pending Motions to Compel Discovery 262 yields a specified need of any party to supplement previously filed pre-trial motions and/or to file evidentiary motions that could not reasonably have been filed by February 22, 2024, the Court will consider such arguments as appropriate, but only upon a particularized and timely showing that events post-dating February 22, 2024, clearly justify additional pre-trial briefing. Signed by Judge Aileen M. Cannon on 2/15/2024. (jf01) (Entered: 02/15/2024)
02/16/2024	315	NOTICE *of Filing* by USA as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira (Attachments: # 1 Exhibit Stamped Half Sheet) (Bratt, Jay) (Entered: 02/16/2024)
02/16/2024	316	RESPONSE to Motion by USA as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira re 312 MOTION for Leave to File *Discovery Material* Replies due by 2/23/2024. (Harbach, David) (Entered: 02/16/2024)
02/20/2024	317	RESPONSE to Motion by Donald J. Trump as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira re 305 MOTION for Leave to File *Surreply* Replies due by 2/27/2024. (Kise, Christopher) (Entered: 02/20/2024)
02/20/2024	318	MOTION for Leave to File *Consolidated Brief* by Donald J. Trump. Responses due by 3/5/2024. (Kise, Christopher) (Entered: 02/20/2024)

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02/20/2024	319	PAPERLESS ORDER granting in part Special Counsel's 305 Conditional Motion for Leave to File Surreply to Defendants' Reply in Support of Motions to Compel. On or before February 26, 2024, the Special Counsel may file a Surreply to Defendants' Reply in Support of Motions to Compel Discovery. Signed by Judge Aileen M. Cannon on 2/20/2024. (jf01) (Entered: 02/20/2024)
02/20/2024	320	PAPERLESS ORDER denying in part, with instructions, Defendant Trump's Motion for Leave to File Consolidated Brief in Support of Pretrial Motions 318 . All pre-trial motions shall be filed on an individual basis to permit clear adjudication of the legal/factual issues presented and to facilitate record clarity and scheduling. Further, all pre-trial motions shall state with particularity the filing party's position on the need for a hearing on the motion (and if a hearing is requested, providing additional specifics on recommended scope/format/sequencing). The Court hereby enlarges the page limit for individual pre-trial motions and responses to twenty-five double-spaced pages, exclusive of attachments. With respect to Defendant Trump's request to publicly file redacted versions of certain pre-trial motions on a temporary basis, the Court denies that request without prejudice and orders as follows. On or before **February 22, 2024**, Defendant Trump shall submit via email to the Special Counsel and the Court final, unredacted copies of all pre-trial motions, with attachments. The parties then shall promptly confer on all sealing/redaction issues presented in the motions. Following such conferral, any party wishing to seal/redact anything in the pre-trial motions shall file a consolidated motion for leave on or before **February 27, 2024**, specifying the particular legal and factual bases for shielding pre-trial filings [*See* ECF No. 283 para. 4]. Consolidated oppositions to such requests for sealing/redaction are due on or before **February 29, 2024**. With respect to forthcoming pre-trial motions that reference or attach discovery materials, the public filing deadline of February 22, 2024 (and all associated response/reply deadlines) is hereby stayed pending resolution of the ongoing sealing/redaction disputes generated by the numerous pre-trial filings in this case. Pre-trial motions that do not implicate potential sealing/redaction concerns shall be filed publicly on February 22, 2024. To the extent Defendants Nauta and De Oliveira anticipate discussing or attaching discovery materials in additional pretrial motions, the procedures set forth in this Order shall apply. Signed by Judge Aileen M. Cannon on 2/20/2024. (jf01) (Entered: 02/20/2024)
02/21/2024	321	PAPERLESS ORDER scheduling sealed, ex parte follow-up telephonic hearing with counsel for Defendant Trump on February 23, 2024, at 3:30 PM. Defense theories to be discussed in conjunction with the Special Counsel's CIPA § 4 Motions 236 and Defendant Trump's CIPA § 4 Challenge 264 . 30 minutes reserved. No classified information to be referenced. Call-in information to be provided to all defense counsel. Defendants' attendance is not required. Signed by Judge Aileen M. Cannon on 2/21/2024. (jf01) (Entered: 02/21/2024)
02/22/2024		SYSTEM ENTRY - Docket Entry 322 restricted/sealed until further notice. (tci) (Entered: 02/22/2024)
02/22/2024	324	MOTION to Dismiss 85 Indictment, *Based On Presidential Immunity* by Donald J. Trump. Responses due by 3/7/2024. (Kise, Christopher) (Entered: 02/22/2024)
02/22/2024	325	MOTION to Dismiss 85 Indictment, *Based on Unconstitutional Vagueness* by Donald J. Trump. Responses due by 3/7/2024. (Kise, Christopher) (Entered: 02/22/2024)
02/22/2024	326	MOTION to Dismiss 85 Indictment, *Based on the Unlawful Appointment and Funding of Special Counsel Jack Smith* by Donald J. Trump. Responses due by 3/7/2024. (Kise, Christopher) (Entered: 02/22/2024)
02/22/2024	327	MOTION to Dismiss 85 Indictment, *Based on the Presidential Records Act* by Donald J. Trump. Responses due by 3/7/2024. (Attachments: # 1 Exhibit)(Kise, Christopher)

		(Entered: 02/22/2024)
02/22/2024	328	NOTICE *of Pretrial Motions and Hearing Requests* by Donald J. Trump re 320 Order on Motion for Leave to File,,,,,,,,, (Kise, Christopher) (Entered: 02/22/2024)
02/23/2024	329	NOTICE *of Filing* by USA as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira (Attachments: # 1 Exhibit Stamped Half Sheet) (Edelstein, Julie) (Entered: 02/23/2024)
02/23/2024	330	Supplemental RESPONSE to Standing Discovery Order by USA as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira (Attachments: # 1 Exhibit Discovery Chart)(Edelstein, Julie) (Entered: 02/23/2024)
02/23/2024	332	PAPERLESS ORDER: The Scheduling Conference set for March 1, 2024 215 shall commence at 10:00 AM in the Fort Pierce Division. The Court anticipates a morning session followed by a break and then an afternoon session for additional legal argument. Pre-conference Order to follow. Signed by Judge Aileen M. Cannon on 2/23/2024. (jf01) (Entered: 02/23/2024)
02/23/2024	333	RESPONSE to Motion by Donald J. Trump re 294 MOTION for Reconsideration re 286 Order on Sealed Motion, 283 Order on Motion for Miscellaneous Relief,,, Replies due by 3/1/2024. (Kise, Christopher) (Entered: 02/23/2024)
02/25/2024	335	PAPERLESS ORDER: **On or before February 28, 2024**, the Special Counsel shall file a Reply in Support of its Motion for Reconsideration 294 . Signed by Judge Aileen M. Cannon on 2/25/2024. (jf01) (Entered: 02/25/2024)
02/25/2024	336	PAPERLESS Minute Entry for sealed, ex parte follow-up telephonic hearing held before Judge Aileen M. Cannon on February 23, 2024. The Court heard argument from counsel on defense theories in the context of CIPA § 4. Total time in court: 40 minutes. Attorney Appearances: Emil Bove, Todd Blanche, Christopher Kise, Stephen H. Weiss, Sasha Dadan, Larry Donald Murrell, Jr., John S. Irving. Other Appearances: Classified Information Security Officer. Court Reporter: Laura Melton, Laura_Melton@flsd.uscourts.gov. (jf01) (Entered: 02/25/2024)
02/26/2024	337	SUR REPLY TO RESPONSE to Motion by USA as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira re 262 MOTION to Compel *Discovery* (Harbach, David) (Entered: 02/26/2024)
02/27/2024	338	ORDER in Anticipation of Scheduling Conference and Hearing. Signed by Judge Aileen M. Cannon on 2/27/2024. *See attached document for full details*. (jf01) (Entered: 02/27/2024)
02/27/2024	339	MOTION for Leave to File *Pretrial Motions With Limited Redactions* by Donald J. Trump as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira. Responses due by 3/12/2024. (Kise, Christopher) (Entered: 02/27/2024)
02/27/2024	340	ORDER Granting Special Counsel's CIPA § 4 Motions as to Defendants Nauta and De Oliveira. Signed by Judge Aileen M. Cannon on 2/27/2024. *See attached document for full details*. (jf01) (Entered: 02/27/2024)
02/27/2024	341	SPEEDY TRIAL REPORT *Twelfth Speedy Trial Report* by USA as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira (Bratt, Jay) (Entered: 02/27/2024)
02/28/2024	342	MOTION Redactions by USA as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira. Responses due by 3/13/2024. (Attachments: # 1 Exhibit)(Bratt, Jay) (Entered: 02/28/2024)

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02/28/2024	343	MOTION for Leave to File *Out of Time* by USA as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira. Responses due by 3/13/2024. (Attachments: # 1 Exhibit 1)(Harbach, David) (Entered: 02/28/2024)
02/28/2024	344	MOTION Motion to Seal *Jury Questionnaire* by USA as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira. Responses due by 3/13/2024. (Bratt, Jay) (Entered: 02/28/2024)
02/28/2024	345	PAPERLESS ORDER granting unopposed 343 Motion for Leave to File Out of Time. **On or before February 28, 2024**, the Special Counsel shall refile its Motion for Sealing and Redaction of Defense Filings and Exhibits and accompanying exhibit as a new entry on the docket. In light of this Order, the Special Counsel's prior filing 342 is denied as moot. Signed by Judge Aileen M. Cannon on 2/28/2024. (jf01) (Entered: 02/28/2024)
02/28/2024	346	ORDER denying Defendants' Motions for Access to Special Counsel's CIPA § 4 Filings 237 238 . Signed by Judge Aileen M. Cannon on 2/28/2024. *See attached document for full details*. (jf01) (Entered: 02/28/2024)
02/28/2024		SYSTEM ENTRY - Docket Entry 347 restricted/sealed until further notice. (amb) (Entered: 02/28/2024)
02/28/2024	348	MOTION Motion for Sealing and Redactions by USA as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira. Responses due by 3/13/2024. (Attachments: # 1 Exhibit Summary Chart)(Bratt, Jay) (Entered: 02/28/2024)
02/28/2024	349	NOTICE *of Filing* by USA as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira (Attachments: # 1 Exhibit Unclassified Version of CIPA Section 4 Motions as to Defendants Nauta and De Oliveira) (Edelstein, Julie) (Entered: 02/28/2024)
02/28/2024	350	REPLY TO RESPONSE to Motion by USA as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira re 294 MOTION for Reconsideration re 286 Order on Sealed Motion, 283 Order on Motion for Miscellaneous Relief,,, (Harbach, David) (Entered: 02/28/2024)
02/28/2024	351	Proposed Voir Dire Questions by USA as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira (Attachments: # 1 Appendix A)(Harbach, David) (Entered: 02/28/2024)
02/29/2024	353	MOTION to Intervene and Be Heard on Access-Related Issues at the 03/01/24 Scheduling Conference by USA Today, The Palm Beach Post, WPLG, Inc., Univision Networks & Studios, Inc., Telemundo Network Group LLC, Sun-Sentinel Company, LLC, Radio Television Digital News Association, Orlando Sentinel Media Group, The McClatchy Company, LLC, Insider Inc., Guardian News & Media Limited, Fort Myers Broadcasting Company, WP Company LLC, TEGNA Inc., Reuters News & Media Inc., POLITICO LLC, The New York Times Company, NBC Universal Media, LLC, National Public Radio, Inc., Los Angeles Times Communications LLC, Gray Media Groups, Inc., The E.W. Scripps Company, Dow Jones & Company, Inc., Cox Enterprises, Inc., CBS Broadcasting, Inc., Bloomberg L.P., The Associated Press, American Broadcasting Companies, Inc., Advance Publications, Inc., Cable News Networks, Inc., CMG Media Corporation as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira. Responses due by 3/14/2024. (Tobin, Charles) (Entered: 02/29/2024)
02/29/2024	354	PAPERLESS ORDER: In light of the public filing of the joint proposed jury questionnaire [351-1] and the Special Counsel's representation on mootness [351 p.1 n.1], the Special Counsel's Motion to Seal Jury Questionnaire is denied as moot. Signed by Judge Aileen M. Cannon on 2/29/2024. (jf01) (Entered: 02/29/2024)
02/29/2024	355	PAPERLESS ORDER: The Court is in receipt of the Press Coalition's 353 Motion to Intervene and Be Heard on Access-Related Issues at the March 1, 2024 Scheduling Conference. Upon review of the Motion, the Court exercises its discretion as follows, for

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		the benefit of the Court. Dana J. McElroy will be permitted to appear as a non-party *amicus curiae* at the March 1, 2024 Scheduling Conference and Hearing for the purpose of presenting oral argument on the sealing and access issues referenced in the Court's Pre-Hearing Order 338 and in related filings 283 286 294 333 350 , including the legal standards governing access to the pre-trial motions (and associated attachments) filed in this criminal case. The Court reserves ruling on the Press Coalition's intervention request 353 . Signed by Judge Aileen M. Cannon on 2/29/2024. (jf01) (Entered: 02/29/2024)
02/29/2024	356	NOTICE *of Scheduling Proposal* by USA as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira re 338 Order (Attachments: # 1 Exhibit Government's Proposed Schedule) (Edelstein, Julie) (Entered: 02/29/2024)
02/29/2024	357	NOTICE *of Defendants' Proposed Schedule* by Donald J. Trump as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira re 338 Order (Kise, Christopher) (Entered: 02/29/2024)
02/29/2024	358	RESPONSE to Motion by Donald J. Trump as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira re 348 MOTION Motion for Sealing and Redactions Replies due by 3/7/2024. (Kise, Christopher) (Entered: 02/29/2024)
03/01/2024	360	Unopposed MOTION to File Amicus Brief by Samuel J. Salario, Jr.. by America First Legal Foundation as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira. Attorney Samuel Joseph Salario, Jr added to party America First Legal Foundation(pty:ip). Responses due by 3/15/2024. (Attachments: # 1 Exhibit Brief of Amicus Curiae America First Legal Foundation in Support of President Trump's Motion to Dismiss the Indictment Base on the Presidential Records Act)(Salario, Samuel) (Entered: 03/01/2024)
03/04/2024	361	PAPERLESS Minute Entry for Scheduling Conference and Hearing held before Judge Aileen M. Cannon on March 1, 2024. The Court heard argument from the parties on their respective scheduling proposals 356 357 , Defendants' request for a hearing on their Motions to Compel 262 , and the Special Counsel's pending Motion for Reconsideration 294 and related filings implicating sealing and/or redaction requests. The Court also heard argument from the Press Coalition as a non-party amicus concerning public-access issues in light of the Special Counsel's pending Motion for Reconsideration 294 and related filings. Total time in court: 4 hours. Attorney Appearances: Jay I. Bratt, David Harbach, Todd Blanche, Emil Bove, Christopher Kise, Stanley Woodward, Sasha Dadan, Larry Donald Murrell, Jr., John S. Irving. Other Appearances: Defendants Waltine Nauta, Carlos De Oliveira, Former President Donald J. Trump, and Dana McElroy (counsel for amicus). Court Reporter: Laura Melton, Laura_Melton@flsd.uscourts.gov. (jf01) (Entered: 03/04/2024)
03/04/2024	362	Supplemental RESPONSE to Standing Discovery Order by USA as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira (Edelstein, Julie) (Entered: 03/04/2024)
03/05/2024	363	Unopposed MOTION Motion for Leave to Follow Filing Procedures Set Forth by the Court in ECF No. 320 by USA as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira. Responses due by 3/19/2024. (Bratt, Jay) (Entered: 03/05/2024)
03/05/2024	364	Unopposed MOTION to File Amicus Brief by Edward H. Trent. by Citizens United Foundation, Citizens United, Gary Lawson, Steven Calabresi, Edwin Meese, III as to Donald J. Trump. Attorney Edward H. Trent added to party Citizens United Foundation(pty:ip), Attorney Edward H. Trent added to party Citizens United(pty:ip), Attorney Edward H. Trent added to party Gary Lawson(pty:ip), Attorney Edward H. Trent added to party Steven Calabresi(pty:ip), Attorney Edward H. Trent added to party Edwin Meese, III(pty:ip). Responses due by 3/19/2024. (Attachments: # 1 Brief of Amici Curiae, # 2 Text of Proposed Order)(Trent, Edward) (Entered: 03/05/2024)

03/05/2024	365	PAPERLESS ORDER granting Special Counsel's Motion for Leave to Follow Filing Procedures Set Forth by the Court in ECF No. 320 363 . As a point of clarity following the March 1, 2024, Hearing, briefing on Defendants' Rule 12 Motions is not stayed. Defendants' replies in support shall be filed on or before March 14, 2024, using the same procedure. Signed by Judge Aileen M. Cannon on 3/5/2024. (jf01) (Entered: 03/05/2024)
03/06/2024	366	NOTICE OF ATTORNEY APPEARANCE James Inman Pearce appearing for USA. . Attorney James Inman Pearce added to party USA(pty:pla). (Pearce, James) (Entered: 03/06/2024)
03/06/2024	367	PAPERLESS ORDER granting Unopposed Motions for Leave to File Amicus Briefs 360 364 . The Court has reviewed the motions and finds that the proposed amici bring to the Court's attention relevant matter that may be of considerable help to the Court in resolving the cited pretrial motions. *See* Sup. Ct. R. 37; Fed. R. App. P. 29; *Resort Timeshare Resales, Inc. v. Stuart*, 764 F. Supp. 1495, 1500 (S.D. Fla. 1991). The amicus briefs [360-1] [364-1] are accepted for Court consideration. Should the Special Counsel or Defendants wish to file a separate response to either amicus brief, they may do so on or before March 15, 2024, in accordance with the Local Rules. Signed by Judge Aileen M. Cannon on 3/6/2024. (jf01) (Entered: 03/06/2024)
03/06/2024	368	NOTICE OF ATTORNEY APPEARANCE Cecil Woods VanDevender appearing for USA. . Attorney Cecil Woods VanDevender added to party USA(pty:pla). (VanDevender, Cecil) (Entered: 03/06/2024)
03/06/2024	369	TRANSCRIPT of Scheduling Conference and Motions as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira held on 03/01/2024 before Judge Aileen M. Cannon, 1-201 pages, Court Reporter: Laura Melton, Laura_Melton@flsd.uscourts.gov. Transcript may be viewed at the court public terminal or purchased by contacting the Court Reporter/Transcriber before the deadline for Release of Transcript Restriction. After that date it may be obtained through PACER. Redaction Request due 3/27/2024. Redacted Transcript Deadline set for 4/8/2024. Release of Transcript Restriction set for 6/4/2024. (Melton, Laura) (Entered: 03/06/2024)
03/06/2024	370	PAPERLESS ORDER denying as moot 353 Press Coalition's Motion to Intervene and Be Heard on Access-Related Issues at the March 1, 2024 Scheduling Conference. Signed by Judge Aileen M. Cannon on 3/6/2024. (jf01) (Entered: 03/06/2024)
03/07/2024	371	Supplemental RESPONSE to Standing Discovery Order by USA as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira (Edelstein, Julie) (Entered: 03/07/2024)
03/07/2024	373	RESPONSE in Opposition by USA as to Donald J. Trump re 327 MOTION to Dismiss 85 Indictment, *Based on the Presidential Records Act* Replies due by 3/14/2024. (Bratt, Jay) (Entered: 03/07/2024)
03/07/2024	374	RESPONSE in Opposition by USA as to Donald J. Trump re 326 MOTION to Dismiss 85 Indictment, *Based on the Unlawful Appointment and Funding of Special Counsel Jack Smith* Replies due by 3/14/2024. (Bratt, Jay) (Entered: 03/07/2024)
03/07/2024	375	Response/Memorandum in Opposition *to undocketed Motion to Dismiss for Selective/Vindictive Prosecution* by USA as to Donald J. Trump to 328 Notice (Other) (Bratt, Jay) (Entered: 03/07/2024)
03/07/2024	376	RESPONSE in Opposition by USA as to Donald J. Trump re 324 MOTION to Dismiss 85 Indictment, *Based On Presidential Immunity* Replies due by 3/14/2024. (Bratt, Jay) (Entered: 03/07/2024)
03/07/2024	377	RESPONSE in Opposition by USA as to Donald J. Trump re 325 MOTION to Dismiss 85 Indictment, *Based on Unconstitutional Vagueness* Replies due by 3/14/2024. (Bratt, Jay)

		(Entered: 03/07/2024)
03/07/2024	382	Response/Memorandum in Opposition *to Requests for Evidentiary Hearings* by USA as to Donald J. Trump, Waltine Nauta to 328 Notice (Other), 359 Notice (Other) (Bratt, Jay) (Entered: 03/07/2024)
03/07/2024	383	NOTICE of Non-Evidentiary Hearing on Defendant Trump's Motion to Dismiss Counts 1-32 on Unconstitutional Vagueness 325 and Defendant Trump and Nauta's Motion to Dismiss Superseding Indictment Based on the President Records Act 327 331 : Motion Hearing set for **3/14/2024 at 10:00 AM** in Fort Pierce Division before Judge Aileen M. Cannon. Counsel should reserve full day for argument. The Reply deadline associated with these Motions is reset to March 14, 2024, at 8:00 AM to accommodate hearing. (jf01) (Entered: 03/07/2024)
03/07/2024	384	MOTION Government's Second Motion for Certain Redactions and Sealing by USA as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira. Responses due by 3/21/2024. (Attachments: # 1 Exhibit Summary Chart)(Bratt, Jay) (Entered: 03/07/2024)
03/07/2024	385	NOTICE *of Filing* by USA as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira (Bratt, Jay) (Entered: 03/07/2024)
03/07/2024		Set/Reset Deadlines/Hearings in case as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira 325 MOTION to Dismiss 85 Indictment, *Based on Unconstitutional Vagueness*, 327 MOTION to Dismiss 85 Indictment, *Based on the Presidential Records Act*. (Per Order DE#383) Motion Hearing set for 3/14/2024 10:00 AM in Fort Pierce Division before Judge Aileen M. Cannon. (drz) (Entered: 03/08/2024)
03/11/2024	386	MOTION for Extension of Time of Reply Deadlines by Donald J. Trump as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira. Responses due by 3/25/2024. (Kise, Christopher) (Entered: 03/11/2024)
03/11/2024		SYSTEM ENTRY - Docket Entry 387 restricted/sealed until further notice. (amb) (Entered: 03/11/2024)
03/11/2024	388	Memorandum in Opposition by USA as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira re 386 MOTION for Extension of Time of Reply Deadlines Replies due by 3/18/2024. (Bratt, Jay) (Entered: 03/11/2024)
03/11/2024	389	REPLY TO RESPONSE to Motion by Waltine Nauta as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira re 386 MOTION for Extension of Time of Reply Deadlines (Dadan, Sasha) (Entered: 03/11/2024)
03/11/2024	390	PAPERLESS ORDER granting Defendants' Motion for an Extension of Reply Deadlines 386 . With the exception of replies in support of 325 and 327 , Defendants shall file replies to their pretrial Motions **on or before March 24, 2024**. Signed by Judge Aileen M. Cannon on 3/11/2024. (jf01) (Entered: 03/11/2024)
03/11/2024	391	MOTION to Appear Pro Hac Vice, Consent to Designation, and Request to Electronically Receive Notices of Electronic Filing for Gene C. Schaerr. Filing Fee $ 200.00. Receipt # FLSDC-17359656 by Citizens United Foundation, Citizens United, Gary Lawson, Steven Calabresi, Edwin Meese, III as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira. Responses due by 3/25/2024. (Attachments: # 1 Certification of Gene C. Schaerr, # 2 Text of Proposed Order)(Trent, Edward) (Entered: 03/11/2024)
03/11/2024		Set/Reset Deadlines/Hearings in case as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira 325 MOTION to Dismiss 85 Indictment, *Based on Unconstitutional Vagueness*, 327 MOTION to Dismiss 85 Indictment, *Based on the Presidential Records Act*. (per Order DE#390) Replies due by 3/24/2024. (drz) (Entered: 03/12/2024)

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03/11/2024		Attorney update in case as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira. Attorney Gene C. Schaerr for Citizens United Foundation, for Citizens United, for Gary Lawson, for Steven Calabresi and for Edwin Meese, III added. (cw) (Entered: 03/12/2024)
03/11/2024	392	MOTION Leave to File Amicus Curiea Briefing of Motion to Challenge Grand Jury and to Dismiss Indictment(s) Pursuant to F.R. Crim.p. 6(b)(1) and 6(b)(2) by Non Party Responses due by 3/25/2024. (cds) (Entered: 03/12/2024)
03/12/2024		SYSTEM ENTRY - Docket Entry 393 restricted/sealed until further notice. (tci) (Entered: 03/12/2024)
03/12/2024	394	PAPERLESS ORDER granting 391 Motion to Appear *Pro Hac Vice*, Consent to Designation, and Request to Electronically Receive Notices of Electronic Filing for Attorney Gene C. Schaerr. The Court reserves the power to withdraw permission for special appearance at any time. Failure to abide by any court order or failure to appear at any scheduled matter may result in immediate revocation of counsel's *pro hac vice* status. Local counsel must be ready to adequately represent the party at any time. Signed by Judge Aileen M. Cannon on 3/12/2024. (jf01) (Entered: 03/12/2024)
03/12/2024	395	PAPERLESS ORDER denying 392 Motion for Leave to File Amicus Curiae. Signed by Judge Aileen M. Cannon on 3/12/2024. (jf01) (Entered: 03/12/2024)
03/12/2024	396	NOTICE of filing sealed ex parte Order Following February 12-13, 2024 CIPA Section 4 Hearings. Signed by Judge Aileen Cannon on 2/19/2024. *See attached document for full details*. (jf01) (Entered: 03/12/2024)
03/12/2024	397	NOTICE of filing sealed ex parte Order Following Special Counsel's Third Classified Section 4 Supplement. Signed by Judge Aileen M. Cannon on 3/4/2024. *See attached document for full details*. (jf01) (Entered: 03/12/2024)
03/13/2024	398	REPLY TO RESPONSE to Motion by Donald J. Trump re 325 MOTION to Dismiss 85 Indictment, *Based on Unconstitutional Vagueness* (Kise, Christopher) (Entered: 03/13/2024)
03/13/2024	399	REPLY TO RESPONSE to Motion by Donald J. Trump re 327 MOTION to Dismiss 85 Indictment, *Based on the Presidential Records Act* (Kise, Christopher) (Entered: 03/13/2024)
03/13/2024	400	RESPONSE in Opposition by USA as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira re 360 Unopposed MOTION to File Amicus Brief by Samuel J. Salario, Jr.. Replies due by 3/20/2024. (Bratt, Jay) (Entered: 03/13/2024)
03/14/2024	401	PAPERLESS Minute Entry for Hearing held before Judge Aileen M. Cannon on March 14, 2024. The Court heard argument on 325 Motion to Dismiss Counts 1-32 Based on Unconstitutional Vagueness and 327 Motion to Dismiss the Indictment Based on the Presidential Records Act. Total time in court: 3 hours 30 minutes. Attorney Appearances: Jay I. Bratt, David Harbach, Todd Blanche, Emil Bove, Christopher Kise, Stanley Woodward, Sasha Dadan, Larry Donald Murrell, Jr., John S. Irving. Other Appearances: Defendants Waltine Nauta, Carlos De Oliveira, Former President Donald J. Trump. Court Reporter: Laura Melton, Laura_Melton@flsd.uscourts.gov. (jf01) (Entered: 03/14/2024)
03/14/2024	402	ORDER denying without prejudice 325 Motion to Dismiss Counts 1-32 Based on Unconstitutional Vagueness. Signed by Judge Aileen M. Cannon on 3/14/2024. *See attached document for full details*. (jf01) (Entered: 03/14/2024)
03/15/2024	403	NOTICE *of Joining and Adopting* by Waltine Nauta as to Donald J. Trump, Waltine Nauta re 327 MOTION to Dismiss 85 Indictment, *Based on the Presidential Records Act*

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		(Dadan, Sasha) (Entered: 03/15/2024)
03/15/2024	404	TRANSCRIPT of Motions to Dismiss as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira held on 3/14/24 before Judge Aileen M. Cannon, 1-173 pages, Court Reporter: Laura Melton, Laura_Melton@flsd.uscourts.gov. Transcript may be viewed at the court public terminal or purchased by contacting the Court Reporter/Transcriber before the deadline for Release of Transcript Restriction. After that date it may be obtained through PACER. Redaction Request due 4/5/2024. Redacted Transcript Deadline set for 4/15/2024. Release of Transcript Restriction set for 6/13/2024. (Melton, Laura) (Entered: 03/15/2024)
03/15/2024	405	RESPONSE in Opposition by USA as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira re 364 Unopposed MOTION to File Amicus Brief by Edward H. Trent. Replies due by 3/22/2024. (Bratt, Jay) (Entered: 03/15/2024)
03/18/2024	406	NOTICE *of Scheduling Change* by Donald J. Trump (Attachments: # 1 Exhibit) (Kise, Christopher) (Entered: 03/18/2024)
03/18/2024	407	ORDER Requiring Preliminary Proposed Jury Instructions and Verdict Forms on Counts 1-32 Only. Signed by Judge Aileen M. Cannon on 3/18/2024. *See attached document for full details*. (jf01) (Entered: 03/18/2024)
03/19/2024	408	SPEEDY TRIAL REPORT *Thirteenth Speedy Trial Report* by USA as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira (Bratt, Jay) (Entered: 03/19/2024)
03/19/2024	409	NOTICE of filing sealed ex parte Order Granting in Part and Reserving Ruling on Part of Special Counsel's CIPA § 4 Motion as to Defendant Trump. Unclassified public order to follow. Signed by Judge Aileen M. Cannon on 3/19/2024. *See attached document for full details*. (jf01) (Entered: 03/19/2024)
03/21/2024	410	MOTION FOR LEAVE TO FILE BRIEF OF PROFESSOR SETH BARRETT TILLMAN AND LANDMARK LEGAL FOUNDATION AS AMICI CURIAE IN SUPPORT OF DEFENDANT TRUMP'S MOTION TO DISMISS THE INDICTMENT [ECF NO. 326] by Non Party. Responses due by 4/4/2024. (Attachments: # 1 Exhibit-Cover Sheet, # 2 Exhibit-Brief of Professor Seth Barrett Tillman and Landmark Legal Foundation as Amici Curiae in Support of Defendant Trump's Motion to Dismiss the Indictment [ECF no. 326](mab) (Entered: 03/21/2024)
03/21/2024	411	PAPERLESS ORDER granting Motion for Leave to File Amicus Brief 410 . *See* Sup. Ct. R. 37; Fed. R. App. P. 29; *Resort Timeshare Resales, Inc. v. Stuart*, 764 F. Supp. 1495, 1500 (S.D. Fla. 1991). The amicus brief [410-1] is accepted for Court consideration. Should the Special Counsel or Defendants wish to file a separate response to the amicus brief, they may do so on or before April 4, 2024, in accordance with the Local Rules. Signed by Judge Aileen M. Cannon on 3/21/2024 (jf01) (Entered: 03/21/2024)
03/22/2024	412	Unclassified Public Order Granting in Part and Reserving Ruling on Part of Special Counsel's CIPA § 4 Motion as to Defendant Trump 236 . Signed by Aileen M. Cannon on 3/22/2024. *See attached document for full details*. (jf01) (Entered: 03/22/2024)
03/24/2024	414	REPLY TO RESPONSE to Motion by Donald J. Trump re 326 MOTION to Dismiss 85 Indictment, *Based on the Unlawful Appointment and Funding of Special Counsel Jack Smith* (Kise, Christopher) (Entered: 03/24/2024)
03/24/2024	415	REPLY TO RESPONSE to Motion by Donald J. Trump re 324 MOTION to Dismiss 85 Indictment, *Based On Presidential Immunity* (Kise, Christopher) (Entered: 03/24/2024)
03/24/2024	416	NOTICE *Regarding Filing of Certain Reply Briefs* by Donald J. Trump (Kise, Christopher) (Entered: 03/24/2024)

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03/25/2024	417	Supplemental Response *to Standing Discovery Order* by USA as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira (Bratt, Jay) (Entered: 03/25/2024)
03/25/2024	418	NOTICE *of Submission* by USA as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira (Bratt, Jay) (Entered: 03/25/2024)
03/27/2024	421	NOTICE *of Trial Date* by Donald J. Trump (Kise, Christopher) (Entered: 03/27/2024)
03/29/2024	422	MOTION to Appear Pro Hac Vice, Consent to Designation, and Request to Electronically Receive Notices of Electronic Filing for Matthew Seligman. Filing Fee $ 200.00. Receipt # FLSDC-17409825 filed by Non Party. Responses due by 4/12/2024. (Attachments: # 1 Exhibit Certification for Matthew Seligman, # 2 Exhibit Proposed Order)(Alonso, Cristina) Modified text on 4/1/2024 to reflect correct filer (See DE 424) (bb). (Entered: 03/29/2024)
03/29/2024	423	MOTION Government's Third Motion for Certain Redactions by USA as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira. Responses due by 4/12/2024. (Bratt, Jay) (Entered: 03/29/2024)
03/29/2024	424	Clerk's Notice to Filer re 422 MOTION to Appear Pro Hac Vice, Consent to Designation, and Request to Electronically Receive Notices of Electronic Filing for Matthew Seligman. Filing Fee $ 200.00. Receipt # FLSDC-17409825. **Wrong Filer Name(s) Selected**; ERROR - The wrong filer name was selected.(drz) Modified text on 4/1/2024 (bb). (Entered: 04/01/2024)
04/02/2024	425	PAPERLESS ORDER: On or before April 5, 2024, and in accordance with Local Rule 88.5, counsel for Defendants shall file a combined Speedy Trial Report (not to exceed five pages) in the same general format as the Special Counsel's reports previously filed in this case. Divergent views, if any, can be noted separately. The report shall include Defendants' positions on all excludable time from the speedy trial period and expressly indicate any Defendants' current assertion or waiver of speedy trial rights, with associated timeframes. This Order does not alter the existing requirement or practice to file speedy trial reports as specified in the Court's June 20, 2023 Order 28 . Signed by Judge Aileen M. Cannon on 4/2/2024. (tci) (Entered: 04/02/2024)
04/02/2024	426	PAPERLESS ORDER denying 422 Motion to Appear *Pro Hac Vice*, Consents to Designation, and Requests to Electronically Receive Notices of Electronic Filing for Attorney Matthew Seligman. Non-parties Constitutional Lawyers, Former Government Officials, and State Democracy Defenders Action are not parties to this action. Nor have they moved for leave to participate as amici curiae. Signed by Judge Aileen M. Cannon on 4/2/2024. (jf01) (Entered: 04/02/2024)
04/02/2024	427	Response by Donald J. Trump to 407 Order (Attachments: # 1 Exhibit A, # 2 Exhibit A-1, # 3 Exhibit A-2, # 4 Exhibit A-3, # 5 Exhibit B) (Kise, Christopher) (Entered: 04/02/2024)
04/02/2024	428	Response *Response to ECF No. 407* by USA as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira to 407 Order (Attachments: # 1 Exhibit Proposed Verdict Form) (Bratt, Jay) (Entered: 04/02/2024)
04/03/2024	429	MOTION for Leave to File Brief by Constitutional Lawyers, Former Government Officials, and State Democracy Defenders Action as Amici Curiae in Opposition to Defendant Donald J. Trump's Motion to Dismiss (ECF No. 326) by Donald J. Trump, Waltine Nauta, Carlos De Oliveira. Responses due by 4/17/2024. (Attachments: # 1 Proposed Order)(scn) (Entered: 04/03/2024)
04/03/2024	430	PAPERLESS ORDER granting Motion for Leave to File Amicus Brief 429 . *See* Sup. Ct. R. 37; Fed. R. App. P. 29; *Resort Timeshare Resales, Inc. v. Stuart*, 764 F. Supp. 1495,

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		1500 (S.D. Fla. 1991). The amicus brief [ECF No. 429 pp. 6-32] is accepted for Court consideration. Should the Special Counsel or Defendants wish to file a separate response to the amicus brief, they may do so on or before April 17, 2024, in accordance with the Local Rules. Signed by Judge Aileen M. Cannon on 4/3/2024. (jf01) (Entered: 04/03/2024)
04/04/2024	431	ORDER Denying Defendant Trump's Motion to Dismiss Superseding Indictment Based on Presidential Records Act 327 . Signed by Judge Aileen M. Cannon on 4/4/2024. *See attached document for full details*. (jf01) (Entered: 04/04/2024)
04/04/2024	432	Response *to Tillman Amicus Brief* by USA as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira to 410 MOTION to File Amicus Brief (Bratt, Jay) (Entered: 04/04/2024)
04/05/2024	433	SPEEDY TRIAL REPORT *in response to Order 425* by Waltine Nauta as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira (Dadan, Sasha) (Entered: 04/05/2024)
04/08/2024	434	NOTICE of Non-Evidentiary Hearing on the following motions: (1) Defendant De Oliveira's Motion to Dismiss Indictment, or, in the Alternative, for a Bill of Particulars 323 ; (2) Defendant Nauta's Motion for a Bill of Particulars; and (3) Defendant Nauta's Motion to Dismiss for Failure to State an Offense / Vagueness as Applied / Rule of Lenity. Motion Hearing set for **4/19/2024 at 10:00 AM** in Fort Pierce Division before Judge Aileen M. Cannon. Order to follow directing partially redacted filings of the second and third motions referenced in this Order.(tci) (Entered: 04/08/2024)
04/08/2024	436	PAPERLESS ORDER granting 435 Motion to Continue Hearing on Motion. Non-Evidentiary Hearing reset for **4/12/2024 2:00 PM** in Fort Pierce Division before Judge Aileen M. Cannon. Signed by Judge Aileen M. Cannon on 4/8/2024. (tci) (Entered: 04/08/2024)
04/09/2024	437	SPEEDY TRIAL REPORT *Fourteenth Speedy Trial Report* by USA as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira (Bratt, Jay) (Entered: 04/09/2024)
04/09/2024	438	ORDER on Sealing Requests Associated with Defendants' Motions to Compel Discovery. Signed by Judge Aileen M. Cannon on 4/9/2024. *See attached document for full details*. (jf01) (Entered: 04/09/2024)
04/10/2024	439	PAPERLESS ORDER: On or before **May 9, 2024**, Defendants shall file Rule 16 expert disclosures and any defense CIPA Section 5(a) written notice based on classified discovery produced to date. The Section 5(a) notice shall be sufficiently detailed and cover both documentary exhibits and anticipated oral testimony. Standard rules regarding classified filings with the Court apply, as set forth in the CIPA protective orders 150 151 152 . Paragraph 4 of the Court's Order 283 on sealing requests and procedures also remains in effect. Signed by Judge Aileen M. Cannon on 4/10/2024. (tci) (Entered: 04/10/2024)
04/10/2024	440	PAPERLESS ORDER: In anticipation of the upcoming hearing on Defendant Nauta's Motion for a Bill of Particulars and Motion to Dismiss for Failure to State an Offense / Vagueness as Applied / Rule of Lenity ("Motions"), Defendant Nauta and the Special Counsel are directed as follows. On or before **April 11, 2024**, Defendant Nauta shall file the foregoing Motions on the public docket as set forth below. Given the undisputedly substantive nature of the Motions, the Court has applied the common-law right of access standard to this inquiry, deeming it sufficient to resolve the instant requests as briefed 339 348 . Under that standard, the Court finds that the Special Counsel's asserted witness-safety and harassment concerns are sufficient, at this juncture, to (1) shield the names of potential government witnesses and ancillary names in the Motions and in the attached transcript of Defendant Nauta's voluntary FBI interview, and (2) replace those names as applicable with anonymous descriptors as used in the Superseding Indictment 85 or as listed in the Special Counsel's forthcoming index [*see* ECF No. 438 p. 16]. Any PII shall

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		be redacted for the same reasons. With respect to the substantive statements contained in Defendant Nauta's FBI interview, the Court reaches a different conclusion. For similar but even stronger reasons than those articulated in the Court's recent Order applying Rule 16 438 --and after balancing the parties' asserted interests in this case of significant public concern--the Court finds the Special Counsel's sweeping request and generalized rationales inadequate to overcome the public's common-law interest in access to these materials. *Chicago Tribune Co. v. Bridgestone/Firestone, Inc.*, 263 F.3d 1304 (11th Cir. 2001); *Romero v. Drummond Co., Inc.*, 480 F.3d 1234 (11th Cir. 2007); *Callahan v. United Network for Organ Sharing*, 17 F.4th 1356 (11th Cir. 2021). Accordingly, Defendant Nauta may attach his FBI interview transcript but shall (for the reasons stated previously) redact the names of any potential government witnesses and ancillary names where referenced therein. The final item of redaction implicated in the Motions is the transcript of Defendant Nauta's grand jury testimony taken on June 21, 2022. For now, Defendant Nauta shall file that transcript under seal in its entirety because presumably it remains subject to protection under Fed. R. Crim. P. 6(e). The parties shall be prepared, however, to present argument at the hearing on the need for continued sealing of that transcript given the Special Counsel's partial use of that transcript in a public motion 381 , and any other factors related to the need for continued secrecy under the circumstances. After filing the Motions in accordance with this Order (but before the hearing), Defendant Nauta shall file the associated Replies to which the Special Counsel has indicated no objection 423 . No redactions beyond those authorized in this Order are permitted. The Court expresses no view on any other seal request or on the applicability of any other legal standards. Signed by Judge Aileen M. Cannon on 4/10/2024. (jf01) (Entered: 04/10/2024)
04/10/2024	442	MOTION to Appear Pro Hac Vice, Consent to Designation, and Request to Electronically Receive Notices of Electronic Filing for Matthew Seligman. Filing Fee $ 200.00 Receipt # FLSDC-17409825 by Constitutional Lawyers, Former Government Officials, and State Democracy Defenders Action as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira. Responses due by 4/24/2024. (drz) (Entered: 04/11/2024)
04/11/2024		Attorney update in case as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira. Attorney Matthew Seligman for Constitutional Lawyers, Former Government Officials, and State Democracy Defenders Action added (pt) (Entered: 04/11/2024)
04/11/2024	443	PAPERLESS ORDER granting 442 Motion to Appear *Pro Hac Vice*, Consents to Designation, and Requests to Electronically Receive Notices of Electronic Filing for Attorney Matthew Seligman. The Court incorporates Mr. Seligman's Certification, filed in connection with a prior Motion [422-1]. The Court reserves the power to withdraw permission for special appearance at any time. Failure to abide by any court order or failure to appear at any scheduled matter may result in immediate revocation of counsel's *pro hac vice* status. Local counsel must be ready to adequately represent the party at any time. Signed by Judge Aileen M. Cannon on 4/11/2024. (jf01) (Entered: 04/11/2024)
04/11/2024	445	PAPERLESS ORDER granting in part Special Counsel's Conditional Motion for Leave to File Surreply to Defendant Nauta's Reply in Support of Motion to Dismiss Based on Selective and Vindictive Prosecution 420 . On or before April 18, 2024, the Special Counsel may file a Surreply to Defendant Nauta's Motion. Signed by Judge Aileen M. Cannon on 4/11/2024 (jf01) (Entered: 04/11/2024)
04/12/2024	450	NOTICE OF ATTORNEY APPEARANCE: Lazaro Fields appearing for Donald J. Trump . Attorney Lazaro Fields added to party Donald J. Trump(pty:dft). (Fields, Lazaro) (Entered: 04/12/2024)
04/12/2024	451	PAPERLESS Minute Entry for Hearing held before Judge Aileen M. Cannon on April 12, 2024. The Court heard argument on Motions filed by Defendants Nauta and De Oliveira

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		323446448 . The parties also presented argument on the need for continued sealing of certain grand jury materials. Orders to follow. Total time in court: 2 hours 5 minutes. Attorney Appearances: Jay I. Bratt, David Harbach, Stanley Woodward, Sasha Dadan, Larry Donald Murrell, Jr., John S. Irving, Lazaro Fields. Other Appearances: Defendants Waltine Nauta, Carlos De Oliveira. Court Reporter: Laura Melton, Laura_Melton@flsd.uscourts.gov. (jf01) (Entered: 04/12/2024)
04/13/2024	452	MOTION for an Adjournment of the Deadlines for Defendants' Rule 16 Expert Disclosures and CIPA § 5(a) Notice by Donald J. Trump as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira. Responses due by 4/29/2024. (Kise, Christopher) (Entered: 04/13/2024)
04/14/2024	453	RESPONSE in Opposition by USA as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira re 452 MOTION for an Adjournment of the Deadlines for Defendants' Rule 16 Expert Disclosures and CIPA § 5(a) Notice Replies due by 4/22/2024. (Edelstein, Julie) (Entered: 04/14/2024)
04/15/2024		SYSTEM ENTRY - Docket Entry 454 restricted/sealed until further notice. (amb) (Entered: 04/15/2024)
04/16/2024	455	TRANSCRIPT of Motions as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira held on 04/12/2024 before Judge Aileen M. Cannon, 1-108 pages, Court Reporter: Laura Melton, Laura_Melton@flsd.uscourts.gov. Transcript may be viewed at the court public terminal or purchased by contacting the Court Reporter/Transcriber before the deadline for Release of Transcript Restriction. After that date it may be obtained through PACER. Redaction Request due 5/7/2024. Redacted Transcript Deadline set for 5/17/2024. Release of Transcript Restriction set for 7/15/2024. (Melton, Laura) (Entered: 04/16/2024)
04/16/2024	456	MOTION for Leave to File Brief by Darryl B. Phillips As Amici Curiae In Support of Defendant's Trump, Et Al. and Both Inclusion of the Presidential Records Act and Dismissal on Grounds of Fact and Law. Responses due by 4/30/2024. (Attachments: # 1 Exhibit Amicus Curiae Brief Of Darryl B. Phillips In Support of Defendant's Trump, Et Al. and Both Inclusion of the Presidential Records Act and Dismissal on Grounds of Fact and Law)(wce) (Entered: 04/16/2024)
04/16/2024	457	PAPERLESS ORDER denying 456 Motion for Leave to File Amicus Curiae Brief. Signed by Judge Aileen M. Cannon on 4/16/2024. (jf01) (Entered: 04/16/2024)
04/18/2024	458	REPLY TO RESPONSE to Motion by Donald J. Trump as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira re 452 MOTION for an Adjournment of the Deadlines for Defendants' Rule 16 Expert Disclosures and CIPA § 5(a) Notice (Kise, Christopher) (Entered: 04/18/2024)
04/18/2024	459	MOTION for Leave to File an Amicus Curiae Brief in Support of Defendants, Donald J. Trump, Waltine Nauta, Carlos De Oliveira filed by Jose A Perez. Responses due by 5/2/2024. (Attachments: # 1 Proposed Order, # 2 Proposed Amicus Curiae Brief, # 3 Consent by Pro Se Litigant to Receive Notices of Electronic Filing)(drz) (Entered: 04/18/2024)
04/18/2024	460	NOTICE of Striking 458 Reply to Response, by Donald J. Trump as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira (Kise, Christopher) (Entered: 04/18/2024)
04/18/2024	461	Corrected REPLY TO RESPONSE to Motion by Donald J. Trump as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira re 452 MOTION for an Adjournment of the Deadlines for Defendants' Rule 16 Expert Disclosures and CIPA § 5(a) Notice (Kise, Christopher) (Entered: 04/18/2024)

04/18/2024	462	ORDER Denying Certain Pretrial Motions Filed by Defendants Nauta and De Oliveira 323 446 448 . Signed by Judge Aileen M. Cannon on 4/18/2024. *See attached document for full details*. (jf01) (Entered: 04/18/2024)
04/18/2024	463	PAPERLESS ORDER denying 459 Motion for Leave to File Amicus Curiae Brief. Signed by Judge Aileen M. Cannon on 4/18/2024. (jf01) (Entered: 04/18/2024)
04/18/2024	465	PAPERLESS ORDER: The Court is in receipt of the Special Counsel's Fourth Motion for Redactions 464 . Consistent with the representation made therein [ECF No. 464 p. 1 n.1], Defendant Nauta shall file any response on or before April 19, 2024. Signed by Judge Aileen M. Cannon on 4/18/2024.(jf01) (Entered: 04/18/2024)
04/18/2024	466	ORDER Following Hearing 451 . Signed by Judge Aileen M. Cannon on 4/18/2024. *See attached document for full details*. (jf01) (Entered: 04/18/2024)
04/18/2024	467	NOTICE *of Filing* by USA as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira (Bratt, Jay) (Entered: 04/18/2024)
04/22/2024	469	MOTION to Compel *Discovery* by Donald J. Trump as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira. Responses due by 5/6/2024. (Attachments: # 1 Exhibit)(Kise, Christopher) (Entered: 04/22/2024)
04/22/2024	470	RESPONSE in Opposition by USA as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira re 469 MOTION to Compel *Discovery* Replies due by 4/29/2024. (Attachments: # 1 Exhibit A, # 2 Exhibit B, # 3 Exhibit C, # 4 Exhibit D, # 5 Exhibit E, # 6 Exhibit F, # 7 Exhibit G) (Harbach, David) (Entered: 04/22/2024)
04/22/2024		SYSTEM ENTRY - Docket Entry 471 restricted/sealed until further notice. (kpe) (Entered: 04/22/2024)
04/22/2024	472	PAPERLESS ORDER: In light of the representations made in the Special Counsel's Third Motion for Certain Redactions as subsequently reaffirmed in the Special Counsel's Fourth Motion for Certain Redactions [ECF No. 423 p. 2; ECF No. 464 p. 1], and noting the absence of any defense objection, the Clerk is directed to **UNSEAL only** ECF Nos. 101, 115, 116, and 118. Signed by Judge Aileen M. Cannon on 4/22/2024. (jf01) (Entered: 04/22/2024)
04/22/2024	473	PAPERLESS ORDER: In light of Defendants' publicly filed Motions to Compel Discovery 469 , now filed in accordance with the Court's Order on Sealing Requests Associated with Defendants' Motions to Compel Discovery 438 , the initial Motions to Compel Discovery 262 are denied as moot. Signed by Judge Aileen M. Cannon on 4/22/2024. (jf01) (Entered: 04/22/2024)
04/22/2024	474	PAPERLESS ORDER: To facilitate the public docketing of Defendant Nauta's Motion to Dismiss for Selective and Vindictive Prosecution and associated filings, Defendant Nauta and the Special Counsel are directed as follows. On or before **April 26, 2024**, the parties shall docket the Motion and associated filings in unredacted form, with the following exceptions. First, consistent with the rules set forth in the Court's prior Orders 438 440 , the parties shall redact potential government witness names (replacing them with anonymized labels provided in the Sealed Amended Index), ancillary names, and PII from the subject materials. Second, the transcript of the April 6, 2023, grand jury testimony of "Person 11" (attached to the Motion in full by Defendant Nauta and in part by the Special Counsel as Exhibit 3) shall be filed under seal consistent with Fed. R. Crim. P. 6(e), subject to any potential future litigation on the matter [*See* ECF No. 466]. In doing so, the parties are advised to docket the actual grand jury transcript/excerpts of "Person 11" as exhibits under seal (as opposed to merely filing stand-in cover pages as done in ECF Nos. 446-2, 448-2). Should any grand jury material clearly falling under Fed. R. Crim. P. 6(e) be quoted or specifically referenced in the Motion/Opposition/Replies or attachments, the

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		parties shall make limited redactions to that grand jury material. The parties shall take care to docket the filings in sequence (i.e., motion, response, reply, surreply). Signed by Judge Aileen M. Cannon on 4/22/2024. (jf01) (Entered: 04/22/2024)
04/23/2024	475	SUPPLEMENT to 300 Reply to Response filed by Waltine Nauta by Waltine Nauta as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira (Dadan, Sasha) (Entered: 04/23/2024)
04/23/2024	476	CLERK'S NOTICE of Compliance re 472 Order. (jmd) (Entered: 04/23/2024)
04/24/2024	477	REPLY TO RESPONSE to Motion by USA as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira re 464 MOTION Government's Fourth Motion for Certain Redactions (Edelstein, Julie) (Entered: 04/24/2024)
04/24/2024	478	NOTICE OF UNAVAILABILITY *of Counsel* by Donald J. Trump for dates of April 29, 2024 through May 14, 2024 (Kise, Christopher) (Entered: 04/24/2024)
04/25/2024		SYSTEM ENTRY - Docket Entry 479 restricted/sealed until further notice. (pcs) (Entered: 04/25/2024)
04/25/2024		SYSTEM ENTRY - Docket Entry 480 restricted/sealed until further notice. (pcs) (Entered: 04/25/2024)
04/25/2024		SYSTEM ENTRY - Docket Entry 481 restricted/sealed until further notice. (pcs) (Entered: 04/25/2024)
04/25/2024		SYSTEM ENTRY - Docket Entry 482 restricted/sealed until further notice. (pcs) (Entered: 04/25/2024)
04/26/2024		SYSTEM ENTRY - Docket Entry 483 restricted/sealed until further notice. (kpe) (Entered: 04/26/2024)
04/26/2024		SYSTEM ENTRY - Docket Entry 484 restricted/sealed until further notice. (kpe) (Entered: 04/26/2024)
04/26/2024	486	RESPONSE in Opposition by USA as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira re 485 MOTION to Dismiss 85 Indictment, *for Selective and Vindictive Prosecution* Replies due by 5/3/2024. (Attachments: # 1 Exhibit Exhibit 1, # 2 Exhibit Exhibit 2, # 3 Exhibit Exhibit 3) (Bratt, Jay) (Entered: 04/26/2024)
04/26/2024	489	NOTICE *of Filing* by USA as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira (Bratt, Jay) (Entered: 04/26/2024)
04/28/2024	490	PAPERLESS ORDER requiring compliance with Court Order 466 . On or before **April 30, 2024**, Defendant Nauta shall publicly file the transcript of his grand jury testimony taken on June 21, 2022, with limited redactions as set forth in the Court's prior Order [ECF No. 466 pp. 1-2]. Defendant Nauta filed an unredacted version of the transcript under seal 479 , but this fails to comply with the Court's instructions 466 . Signed by Judge Aileen M. Cannon on 4/28/2024. (jf01) (Entered: 04/28/2024)
04/28/2024	491	PAPERLESS ORDER granting Motion for Leave to File Pretrial Motions With Limited Redactions 339 . The unopposed Motion seeks redaction of PII from Defendants' undocketed pretrial motions. Additional motion-specific directives concerning the public docketing of Defendants' outstanding pretrial motions to follow. Signed by Judge Aileen M. Cannon on 4/28/2024. (jf01) (Entered: 04/28/2024)
04/28/2024	492	PAPERLESS ORDER: To facilitate the public docketing of Defendant Nauta's Motion to Suppress Evidence and associated filings, and following a careful *in camera* review of such materials, Defendant Nauta and the Special Counsel are directed as follows. On or before **May 2, 2024**, the parties shall docket the Motion and all exhibits (A through G

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		plus Nauta's FBI interview transcript and grand jury transcript, if attached), and associated filings (Opposition/Reply) and exhibits in unredacted form, with the following exceptions. First, consistent with the rules set forth in the Court's prior Orders 438 440 474 , the parties shall redact potential government witness names (replacing them with anonymized labels provided in the most current Sealed Amended Index 484), ancillary names, and PII from the subject materials. Search warrant materials shall be filed in fully unredacted form except for names, PII, device numbers, license plate numbers, ID numbers, business names, and professional titles as necessary to shield witness identities. Makes and models of vehicles alone are not PII and shall not be redacted. Photographs shall remain unredacted with limited, targeted redactions of license plate numbers and faces in photographs. Photographs of the target residence may be redacted. To the extent Defendant Nauta attaches his grand jury transcript to the Motion, he shall attach it using the redaction instructions provided in the Court's earlier Order 466 , with which Defendant Nauta must comply 490 . Finally, because the Special Counsel's prior filed Response lacked attachments 381 , the Special Counsel is ordered to refile the Opposition, with attachments, in accordance with this Order. The parties shall take care to docket the filings in sequence (i.e., motion, response, reply). No additional redactions beyond those authorized herein are permitted. Signed by Judge Aileen M. Cannon on 4/28/2024. (jf01) (Entered: 04/28/2024)
04/30/2024	500	SPEEDY TRIAL REPORT *Fifteenth Speedy Trial Report* by USA as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira (Bratt, Jay) (Entered: 04/30/2024)
04/30/2024	501	PAPERLESS ORDER: For purposes of record completeness, on or before May 2, 2024, Defendant Nauta shall file under seal completely unredacted versions of the prior motions docketed publicly at entries 446 and 448. When doing so, Defendant Nauta shall annotate the corresponding docket entry number for each sealed filing (e.g., 446 and 448). Signed by Judge Aileen M. Cannon on 4/30/2024. (jf01) (Entered: 04/30/2024)
04/30/2024	502	PAPERLESS ORDER: On or before May 2, 2024, the Special Counsel shall file under seal a copy of the transfer order referenced in the Notice of Submission 418 , along with the underlying petition and any other docketed filings/notices/orders on the subject of such transfer. Signed by Judge Aileen M. Cannon on 4/30/2024. (jf01) (Entered: 04/30/2024)
04/30/2024	503	PAPERLESS ORDER: To facilitate the public docketing of Defendant Trump's "Motion to Dismiss Indictment Based on Selective and Vindictive Prosecution" and associated filings, and consistent with the Court's prior Orders 438 440 474 492 , Defendant Trump is directed as follows. On or before **May 2, 2024**, Defendant Trump shall docket the Motion and associated filings publicly, redacting only the names of potential government witnesses (replacing them with anonymized labels provided in the most current Sealed Amended Index 484), ancillary names, and PII. In docketing the Reply, Defendant Trump shall indicate in the docket text the Opposition to which it responds 375 . Thereafter, and for record completeness, Defendant Trump shall file under seal unredacted versions of the Motion and Reply. Signed by Judge Aileen M. Cannon on 4/30/2024. (jf01) (Entered: 04/30/2024)
04/30/2024	504	PAPERLESS ORDER granting in part Special Counsel's Fourth Motion for Redactions 464 in accordance with the Court's prior Order 474 . The Court expresses no opinion on any other requests contained in the Special Counsel's Motion. Signed by Judge Aileen M. Cannon on 4/30/2024. (jf01) (Entered: 04/30/2024)
04/30/2024	505	PAPERLESS ORDER granting in part the Special Counsel's Third Motion for Redactions 423 in accordance with the Court's prior Orders 474 492 . The Court expresses no opinion on any other requests contained in the Special Counsel's Motion. Signed by Judge Aileen M. Cannon on 4/30/2024. (jf01) (Entered: 04/30/2024)

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05/01/2024	506	PAPERLESS ORDER AND NOTICE scheduling sealed telephonic status conference/hearing to discuss grand jury matters on May 8, 2024, at 2:00 PM. The parties shall be prepared to discuss specific grand jury material implicated in this proceeding in light of the Special Counsel's sealed status report 483 ; updates to pending disclosure proceedings in the U.S. District Court for the District of Columbia 481 499 ; and pending sealing/redaction arguments related to grand jury material attached to or quoted in Defendant Trump's "Motion to Dismiss Indictment Based on Prosecutorial Misconduct and Due Process Violations" and "Motion for Relief Related to Mar-A-Lago Raid and Unlawful Piercing of Attorney-Client Privilege." 90 minutes reserved. To the extent any non-parties to this proceeding have not yet had an opportunity to appear and be heard on the disclosure petition now transferred to this Court, the parties shall come prepared to discuss any additional procedures required. Call-in information to be provided to all counsel. Defendants' attendance is not required. Signed by Judge Aileen M. Cannon on 5/1/2024.(tci) (Entered: 05/01/2024)
05/02/2024	508	MOTION to Dismiss 85 Indictment, *based on Selective and Vindictive Prosecution* by Donald J. Trump. Responses due by 5/16/2024. (Kise, Christopher) (Entered: 05/02/2024)
05/02/2024	509	REPLY TO RESPONSE to Motion by Donald J. Trump re 508 MOTION to Dismiss 85 Indictment, *based on Selective and Vindictive Prosecution (replying to Opposition 375)* (Kise, Christopher) (Entered: 05/02/2024)
05/02/2024		SYSTEM ENTRY - Docket Entry 510 restricted/sealed until further notice. (scn) (Entered: 05/02/2024)
05/02/2024		SYSTEM ENTRY - Docket Entry 511 restricted/sealed until further notice. (kpe) (Entered: 05/02/2024)
05/02/2024		SYSTEM ENTRY - Docket Entry 512 restricted/sealed until further notice. (kpe) (Entered: 05/02/2024)
05/02/2024		SYSTEM ENTRY - Docket Entry 514 restricted/sealed until further notice. (kpe) (Entered: 05/02/2024)
05/02/2024	515	NOTICE *of Filing* by USA as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira (Edelstein, Julie) (Entered: 05/02/2024)
05/02/2024	518	NOTICE *of Filing* by Donald J. Trump (Kise, Christopher) (Entered: 05/02/2024)
05/03/2024	522	RESPONSE in Opposition by USA as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira re 507 MOTION to Continue *CIPA Section 5(a) and Rule 16(b)(1)(C) Disclosure Deadlines* re 439 Order,, Replies due by 5/10/2024. (Attachments: # 1 Exhibit A) (Edelstein, Julie) (Entered: 05/03/2024)
05/06/2024	525	MOTION for Leave to File *Sur-Reply based on Newly Discovered Evidence of Discovery Violations, Misrepresentations and Potential Spoliation* by Donald J. Trump. Responses due by 5/20/2024. (Attachments: # 1 Exhibit)(Kise, Christopher) (Entered: 05/06/2024)
05/06/2024	526	PAPERLESS ORDER granting Defendant Trump's Motion for Leave to File Sur-Reply [ECF No. 525]. On or before **May 7, 2024**, Defendant Trump shall file the attached proposed Sur-Reply [ECF No. 525-1] as a separate entry on the docket. Signed by Judge Aileen M. Cannon on 5/6/2024. (jf01) (Entered: 05/06/2024)
05/06/2024	527	Sur-Reply *based on Newly Discovered Evidence of SCO Discovery Violations and Misrepresentations* by Donald J. Trump to 452 MOTION for an Adjournment of the Deadlines for Defendants' Rule 16 Expert Disclosures and CIPA § 5(a) Notice (Kise, Christopher) (Entered: 05/06/2024)

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05/06/2024	528	PAPERLESS ORDER temporarily staying CIPA § 5 and Rule 16 Expert Disclosure Deadlines 439 . Order setting second set of pretrial deadlines/hearings to follow. Signed by Judge Aileen M. Cannon on 5/6/2024. (jf01) (Entered: 05/06/2024)
05/07/2024	529	NOTICE *of Filing Exhibit* by Donald J. Trump re 527 Response/Reply/Answer (Other), (Attachments: # 1 Exhibit) (Kise, Christopher) (Entered: 05/07/2024)
05/07/2024	530	ORDER SETTING SECOND SET OF PRE-TRIAL DEADLINES/HEARINGS. Signed by Judge Aileen M. Cannon on 5/7/2024. *See attached document for full details*. (tci) (Entered: 05/07/2024)
05/07/2024	531	PAPERLESS ORDER: In light of the Court's Order Setting Second Set of Pre-Trial Deadlines/Hearings 530 , Defendants' Motions to Adjourn CIPA § 5 and Rule 16 Expert Disclosure Deadlines 452 507 are granted in part. Signed by Judge Aileen M. Cannon on 5/7/2024. (jf01) (Entered: 05/07/2024)
05/08/2024	532	MOTION to Appear Pro Hac Vice, Consent to Designation, and Request to Electronically Receive Notices of Electronic Filing for Joshua Blackman by Amicus Curiae, Landmark Legal Foundation. Filing Fee $200.00. Receipt # 3471. Responses due by 5/22/2024. (Attachments: # 1 Proposed Order, # 2 Exhibit, # 3 Receipt)(scn) (Entered: 05/08/2024)
05/08/2024	533	PAPERLESS Minute Entry for Sealed Telephonic Status Conference/Hearing held before Judge Aileen M. Cannon on May 8, 2024. The Court heard from the parties on various grand-jury-related matters. Sealed order to follow. Total time in court: 2 hours 5 minutes. Attorney Appearances: David Harbach, Julie Edelstein, Anne McNamara, Michael Thakur, J.P. Cooney, Jack Smith, Todd Blanche, Emil Bove, Lazaro Fields, Stanley Woodward, Sasha Dadan, Larry Donald Murrell, Jr., John S. Irving. Court Reporter: Laura Melton, Laura_Melton@flsd.uscourts.gov.(jf01) (Entered: 05/08/2024)
05/08/2024	534	PAPERLESS ORDER: Finding no basis for continued sealing [*See* ECF No. 472], and in the absence of any objection from the parties during the May 8, 2024, hearing 533 , the Clerk is directed to **UNSEAL** ECF Nos. 117 and 119. Signed by Judge Aileen M. Cannon on 5/8/2024. (jf01) (Entered: 05/08/2024)
05/08/2024	535	NOTICE of Compliance re 534 Order. (DE's 117 and 119 Unsealed) (amb) (Entered: 05/09/2024)
05/09/2024		Attorney update in case as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira. Attorney Joshua Blackman for Landmark Legal Foundation added (pt) (Entered: 05/09/2024)
05/09/2024	538	PAPERLESS ORDER granting 532 Motion to Appear *Pro Hac Vice*, Consents to Designation, and Requests to Electronically Receive Notices of Electronic Filing for Attorney Joshua Blackman. The Court reserves the power to withdraw permission for special appearance at any time. Failure to abide by any court order or failure to appear at any scheduled matter may result in immediate revocation of counsel's *pro hac vice* status. Local counsel must be ready to adequately represent the party at any time. Signed by Judge Aileen M. Cannon on 5/9/2024. (jf01) (Entered: 05/09/2024)
05/09/2024	539	ORDER Following Hearing. Signed by Judge Aileen M. Cannon on 5/9/2024. *See attached document for full details*. (jf01) (Entered: 05/09/2024)
05/09/2024		Set/Reset Deadlines/Hearings as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira: (Per Order DE 539) Status Report due by 5/20/2024. (drz) (Entered: 05/10/2024)
05/10/2024	541	PAPERLESS ORDER granting Motion for Leave to Be Excused from May 22, 2024 Hearing 540 . Mr. Irving is excused from attending the May 22, 2024 motions hearing.

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		Other counsel for Defendant De Oliveira must be present at the hearing. Signed by Judge Aileen M. Cannon on 5/10/2024. (jf01) (Entered: 05/10/2024)
05/15/2024		SYSTEM ENTRY - Docket Entry 542 restricted/sealed until further notice. (amb) (Entered: 05/15/2024)
05/16/2024		SYSTEM ENTRY - Docket Entry 543 restricted/sealed until further notice. (pcs) (Entered: 05/16/2024)
05/16/2024	544	PAPERLESS ORDER: The Court is in receipt of the Special Counsel's Sealed Notice 543 , filed on May 16, 2024. To properly consider the remaining sealing and redaction disputes, and to more effectively compare the parties' positions in light of the developments in the parties' proposed requests, the Special Counsel is directed to submit, **on or before 3 p.m. on May 17, 2024,** his own set of red-box proposed redactions to the cited motions and exhibits. Signed by Aileen M. Cannon on 5/16/2024. (jf01) (Entered: 05/16/2024)
05/16/2024	545	NOTICE *of Filing* by Donald J. Trump re 539 Order (Kise, Christopher) (Entered: 05/16/2024)
05/17/2024		SYSTEM ENTRY - Docket Entry 547 restricted/sealed until further notice. (kpe) (Entered: 05/17/2024)
05/17/2024	548	Unopposed MOTION for Leave to be Excused from the May 22, 2024 Hearing by Donald J. Trump. Responses due by 5/31/2024. (Kise, Christopher) (Entered: 05/17/2024)
05/17/2024	549	NOTICE of Compliance by USA as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira re 544 Order,, (Thakur, Michael) (Entered: 05/17/2024)
05/17/2024	550	PAPERLESS ORDER granting Defendant Trump's Unopposed Motion for Leave to be Excused from the May 22, 2024 Hearing 548 . Counsel for Defendant Trump must be present. Signed by Judge Aileen M. Cannon on 5/17/2024. (jf01) (Entered: 05/17/2024)
05/17/2024	554	MOTION for Leave to File to Appear as Amicus Curiae and File Amicus Curiae Brief by Jeffrey Emil Groover. Responses due by 5/31/2024. (Attachments: # 1 Brief for Amicus Curiae)(nan) (Entered: 05/20/2024)
05/19/2024	552	ORDER Directing Public Docketing of Outstanding Undocketed Pre-Trial Motions and Resolving Related Motions 348 384 . Signed by Judge Aileen M. Cannon on 5/19/2024. *See attached document for full details*. (jf01) (Entered: 05/19/2024)
05/20/2024	553	PAPERLESS ORDER: On or before 5/20/2024 at 4:00 PM, Defendants shall publicly docket their Reply in Support of Motion to Dismiss Indictment for Insufficient Pleading 352 . Signed by Judge Aileen M. Cannon on 5/20/2024. (jf01) (Entered: 05/20/2024)
05/20/2024	555	PAPERLESS ORDER denying 554 Motion for Leave to Appear as Amicus Curiae. Signed by Judge Aileen M. Cannon on 5/22/2024 (jf01) (Entered: 05/20/2024)
05/20/2024	557	STATUS REPORT *regarding sealed matters* by USA as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira (Thakur, Michael) (Entered: 05/20/2024)

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05/21/2024	558	PAPERLESS ORDER: The Court is in receipt of the Joint Status Report Regarding Sealed Filings 557 . Upon review, the Clerk is directed to **UNSEAL** ECF Nos. 45, 48, 139, 140, and 141. On or before May 28, 2024, (1) Defendant Nauta shall publicly file Docket Entry 138 with redactions to names of potential witnesses, ancillary names, and personal identifying information (PII); and (2) the Special Counsel shall publicly file Docket Entry 142 with redactions to witness names, ancillary names, and PII. In docketing these filings, the parties shall clearly indicate in the docket text the corresponding sealed filing. Signed by Judge Aileen M. Cannon on 5/21/2024. (jf01) (Entered: 05/21/2024)
05/21/2024		SYSTEM ENTRY - Docket Entry 559 restricted/sealed until further notice. (amb) (Entered: 05/21/2024)
05/21/2024		SYSTEM ENTRY - Docket Entry 560 restricted/sealed until further notice. (amb) (Entered: 05/21/2024)
05/21/2024	561	MOTION to Dismiss 85 Indictment, *Based on Prosecutorial Misconduct and Due Process Violations* by Donald J. Trump. Responses due by 6/4/2024. (Attachments: # 1 Exhibit 1, # 2 Exhibit 2, # 3 Exhibit 3-11, # 4 Exhibit 12, # 5 Exhibit 13-15)(Kise, Christopher) (Entered: 05/21/2024)
05/21/2024	562	RESPONSE in Opposition by USA as to Donald J. Trump re 561 MOTION to Dismiss 85 Indictment, *Based on Prosecutorial Misconduct and Due Process Violations* Replies due by 5/28/2024. (Attachments: # 1 Exhibit 1, # 2 Exhibit 2) (Harbach, David) (Entered: 05/21/2024)
05/21/2024	563	REPLY TO RESPONSE to Motion by Donald J. Trump re 561 MOTION to Dismiss 85 Indictment, *Based on Prosecutorial Misconduct and Due Process Violations* (Kise, Christopher) (Entered: 05/21/2024)
05/21/2024	564	NOTICE of Compliance re 558 Order. (ECF Nos. 45, 48, 139, 140, and 141 Unsealed) (amb) (Entered: 05/21/2024)
05/21/2024	565	SPEEDY TRIAL REPORT *Sixteenth Speedy Trial Report* by USA as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira (Bratt, Jay) (Entered: 05/21/2024)
05/21/2024	566	MOTION to Suppress Evidence *and*, MOTION to Dismiss 85 Indictment, (Responses due by 6/4/2024.) by Donald J. Trump. (Attachments: # 1 Exhibit 1, # 2 Exhibit 2, # 3 Exhibit 3-4, # 4 Exhibit 5, # 5 Exhibit 6-9, # 6 Exhibit 10-15, # 7 Exhibit 16, # 8 Exhibit 17, # 9 Exhibit 18, # 10 Exhibit 19-20)(Kise, Christopher) (Entered: 05/21/2024)
05/21/2024	567	RESPONSE in Opposition by USA as to Donald J. Trump re 566 MOTION to Suppress Evidence *and* MOTION to Dismiss 85 Indictment, Replies due by 5/28/2024. (Attachments: # 1 Exhibit 1, # 2 Exhibit 2, # 3 Exhibit 3, # 4 Exhibit 4, # 5 Exhibit 5) (Harbach, David) (Entered: 05/21/2024)
05/21/2024	568	REPLY TO RESPONSE to Motion by Donald J. Trump re 566 MOTION to Suppress Evidence *and* MOTION to Dismiss 85 Indictment, (Kise, Christopher) (Entered: 05/21/2024)
05/21/2024	569	NOTICE *of Filing* by Donald J. Trump re 552 Order on Motion for Miscellaneous Relief, (Kise, Christopher) (Entered: 05/21/2024)
05/21/2024		SYSTEM ENTRY - Docket Entry 570 restricted/sealed until further notice. (amb) (Entered: 05/21/2024)
05/21/2024		SYSTEM ENTRY - Docket Entry 571 restricted/sealed until further notice. (amb) (Entered: 05/21/2024)

05/21/2024	572	NOTICE of Compliance by USA as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira re 552 Order on Motion for Miscellaneous Relief, (Thakur, Michael) (Entered: 05/21/2024)
05/22/2024	573	PAPERLESS Minute Entry for Hearing held before Judge Aileen M. Cannon on May 22, 2024. The Court heard argument on (1) Defendant Nauta's Motion to Dismiss for Selective and Vindictive Prosecution 485 ; and (2) Defendants' Motion to Dismiss Indictment for Insufficient Pleading 352 . Motions taken under advisement. On or before May 24, 2024, parties directed to file sealed/unredacted versions of remaining items as discussed for docket completeness, along with any notices of supplemental authority in accordance with the Local Rules. Total time in court: 4 hours 30 minutes. Attorney Appearances: Jay I. Bratt, David Harbach, Anne McNamara, Michael Thakur, Todd Blanche, Christopher Kise, Stanley Woodward, Sasha Dadan, Larry Donald Murrell, Jr. Other Appearances: Defendants Waltine Nauta, Carlos De Oliveira. Court Reporter: Laura Melton, Laura_Melton@flsd.uscourts.gov. (jf01) (Entered: 05/22/2024)
05/23/2024	575	Supplemental RESPONSE to Standing Discovery Order by USA as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira (Edelstein, Julie) (Entered: 05/23/2024)
05/23/2024	577	NOTICE of Compliance by USA as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira (Thakur, Michael) (Entered: 05/23/2024)
05/24/2024	580	TRANSCRIPT of Motions as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira held on 5/22/2024 before Judge Aileen M. Cannon, 1-200 pages, Court Reporter: Laura Melton, 772-467-2327 / Laura_Melton@flsd.uscourts.gov. Transcript may be viewed at the court public terminal or purchased by contacting the Court Reporter/Transcriber before the deadline for Release of Transcript Restriction. After that date it may be obtained through PACER. Redaction Request due 6/14/2024. Redacted Transcript Deadline set for 6/24/2024. Release of Transcript Restriction set for 8/22/2024. (Melton, Laura) (Entered: 05/24/2024)
05/24/2024	581	MOTION to Modify Conditions of Release by USA as to Donald J. Trump. Responses due by 6/7/2024. (Attachments: # 1 Exhibit Exhibits to Motion)(Bratt, Jay) (Entered: 05/24/2024)
05/27/2024	583	MOTION to Strike 581 MOTION to Modify Conditions of Release , MOTION for Sanctions by Donald J. Trump. Responses due by 6/10/2024. (Attachments: # 1 Exhibit) (Kise, Christopher) (Entered: 05/27/2024)
05/28/2024	584	PAPERLESS ORDER denying without prejudice for lack of meaningful conferral 581 the Special Counsel's Motion to Modify Conditions of Release. Upon review of the Motion 581 [581-1], Defendant Trump's procedural opposition 583 , and the attached email correspondence between counsel [583-1], the Court finds the Special Counsel's pro forma "conferral" to be wholly lacking in substance and professional courtesy. It should go without saying that meaningful conferral is not a perfunctory exercise. Sufficient time needs to be afforded to permit reasonable evaluation of the requested relief by opposing counsel and to allow for adequate follow-up discussion as necessary about the specific factual and legal basis underlying the motion. This is so even when a party "assume[s]" the opposing party will oppose the proposed motion [583-1], and it applies with additional force when the relief sought -- at issue for the first time in this proceeding and raised in a procedurally distinct manner than in cited cases -- implicates substantive and/or Constitutional questions. Because the filing of the Special Counsel's Motion did not adhere to these basic requirements, it is due to be denied without prejudice. Any future, non-emergency motion brought in this case -- whether on the topic of release conditions or anything else -- shall not be filed absent meaningful, timely, and professional conferral. S.D. Fla. L.R. 88.9, 7.1(a)(3); *see* ECF No. 28 p. 2; ECF No. 82. Moreover, all certificates

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		of conference going forward shall (1) appear in a separate section at the end of the motion, not embedded in editorialized footnotes; (2) specify, in objective terms, the exact timing, method, and substance of the conferral conducted; and (3) include, if requested by opposing counsel, no more than 200 words verbatim from the opposing side on the subject of conferral, again in objective terms. Failure to comply with these requirements may result in sanctions. In light of this Order, the Court determines to deny without prejudice Defendant Trump's Motion to Strike and for Sanctions 583 . Signed by Judge Aileen M. Cannon on 5/28/2024. (jf01) (Entered: 05/28/2024)
05/28/2024	585	Government's Response to Defendant Nauta's Motion to Reference Discovery -- ECF No. 142 Defendant Nauta's by USA as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira (Bratt, Jay) (Entered: 05/28/2024)
05/28/2024	586	Unopposed MOTION to Adopt/Join 364 Unopposed MOTION to File Amicus Brief by Edward H. Trent. *by Former Attorney General Michael B. Mukasey* by Citizens United Foundation, Citizens United, Gary Lawson, Steven Calabresi, Edwin Meese, III as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira. Responses due by 6/11/2024. (Attachments: # 1 Text of Proposed Order)(Trent, Edward) (Entered: 05/28/2024)
05/29/2024	587	PAPERLESS ORDER granting 586 Former United States Attorney General Michael B. Mukasey's Unopposed Motion for Leave to Join Amicus Brief Filed by Former Attorney General Edwin Meese III, Professors Calabresi and Lawson, Citizens United, and Citizens United Foundation 364 . Signed by Judge Aileen M. Cannon on 5/29/2024. (jf01) (Entered: 05/29/2024)
05/29/2024	588	PAPERLESS ORDER: In anticipation of the June 21, 2024, hearing on Defendant Trump's Motion to Dismiss the Indictment Based on the Unlawful Appointment and Funding of Special Counsel Jack Smith 326 , the Special Counsel and Defendant Trump are directed as follows. On or before June 11, 2024, the parties shall separately file supplemental briefs, not to exceed 15 double-spaced pages (exclusive of title/certificates, etc.), on what impact, if any, the Supreme Court's decision in *Consumer Financial Protection Bureau v. Community Financial Services Association of America, Ltd.*, 601 U.S. 416 (2024), has on Defendant Trump's Appropriations Clause challenge as raised in the Motion 326 . The parties' supplemental briefs also should clarify, in a separate section, what appears to be the position set forth in the parties' submissions--i.e., that no factual development is warranted or necessary to resolve either of the two challenges raised in the Motion, because the extent of the Special Counsel's authority and status is delimited and evaluated by the statutory and regulatory authorities cited in Appointment Order No. 5559-2022 (for purposes of the Appointments Clause challenge), and by that same Appointment Order and the cited Department of Justice Appropriations Act (for purposes of the Appropriations Clause challenge). The Court also authorizes (but does not require) the three already-approved amici 364 410 429 on the Motion--and only those amici--to file, by the June 11, 2024, deadline, supplemental briefs limited reasonably to the factual-development question raised above, not to exceed 10 double-spaced pages (exclusive of title/certificates, etc.). Signed by Judge Aileen M. Cannon on 5/29/2024. (jf01) (Entered: 05/29/2024)
05/30/2024	589	Discharged per Order DE#603-PAPERLESS ORDER TO SHOW CAUSE as to Defendant Nauta: By order dated May 21, 2024, Defendant Nauta was required, on or before May 28, 2024, to publicly file Docket Entry 138 with specified redactions 558 . Defendant Nauta has not complied with that Order, and the deadline to do so has passed. Accordingly, on or before **June 3, 2024**, Defendant Nauta shall (1) publicly file Docket Entry 138 in compliance with the Court's prior Order 558 ; and (2) show cause, in writing, why he failed to comply with the Court's instructions by the original deadline of May 28, 2024. Failure to comply with this Order may result in sanctions. Signed by Judge Aileen M. Cannon on 5/30/2024. (jf01) Modified text on 6/4/2024 (drz). (Entered: 05/30/2024)

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05/30/2024		Set/Reset Deadlines/Hearings as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira: Show Cause Response due by 6/3/2024. (per order de#589) (drz) (Entered: 05/31/2024)
05/31/2024	590	MOTION for Leave of Professor Seth Barrett Tillman and Landmark Legal Foundation to Participate in Oral Argument as Amici Curiae in Support of Defendant Trump's Motion to Dismiss the Indictment, [ECF No. 326] by Michael A. Sasso. Responses due by 6/14/2024. (nan) (Entered: 05/31/2024)
05/31/2024	591	STATUS REPORT *Government's Discovery Status Report* by USA as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira (Edelstein, Julie) (Entered: 05/31/2024)
05/31/2024	592	MOTION to Modify Conditions of Release by USA as to Donald J. Trump. Responses due by 6/14/2024. (Attachments: # 1 Exhibit Exhibit 1, # 2 Exhibit Exhibit 2, # 3 Exhibit Exhibit 3, # 4 Exhibit Exhibit 4, # 5 Exhibit Exhibit 5)(Bratt, Jay) (Entered: 05/31/2024)
06/02/2024	594	PAPERLESS ORDER: On or before June 14, 2024, Defendant Trump shall respond to 592 the Special Counsel's Motion for Modification of Conditions of Release. Any reply in support of the Motion shall be due on or before June 21, 2024. Signed by Judge Aileen M. Cannon on 6/2/2024. (jf01) (Entered: 06/02/2024)
06/03/2024		Set/Reset Deadlines/Hearings in case as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira 592 MOTION to Modify Conditions of Release . (per Order DE 594) Responses due by 6/14/2024. Replies due by 6/21/2024. (drz) (Entered: 06/03/2024)
06/03/2024	598	Unopposed MOTION for Leave to Participate in Oral Argument as Amici Curiae in Support of President Trump's Motion to Dismiss [ECF No. 326] *by Former Attorney General Michael B. Mukasey and* by Citizens United Foundation, Citizens United, Gary Lawson, Steven Calabresi, Edwin Meese, III as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira. Responses due by 6/17/2024. (Attachments: # 1 Text of Proposed Order)(Trent, Edward) (Entered: 06/03/2024)
06/03/2024	599	PAPERLESS ORDER: The Court is in receipt of Defendant Nauta's Notice of Filing 595 , which attaches the overdue redacted filing 138 but fails to fully comply with the Court's Order to Show Cause 589 . Defendant Nauta is reminded that, on or before **June 3, 2024**, he must "show cause, in writing, why he failed to comply with the Court's instructions by the original deadline of May 28, 2024." Signed by Judge Aileen M. Cannon on 6/3/2024. (jf01) (Entered: 06/03/2024)
06/03/2024	600	Supplemental RESPONSE to Standing Discovery Order by USA as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira (Edelstein, Julie) (Entered: 06/03/2024)
06/03/2024	601	MOTION for Leave to Participate in Oral Argument as Amici Curiae in Opposition to Defendant Donald J. Trump's Motion to Dismiss The Indictment by Constitutional Lawyers, Former Government Officials, and State Democracy Defenders Action as to Donald J. Trump. Responses due by 6/17/2024. (Attachments: # 1 Exhibit List of Amici Curiae, # 2 Text of Proposed Order Proposed Order)(Alonso, Cristina) (Entered: 06/03/2024)
06/04/2024	603	PAPERLESS ORDER: In light of Defendant Nauta's Response to the Court's Order to Show Cause 602 and his earlier Notice of Compliance 595 , the Court's Order to Show Cause 589 is DISCHARGED. Defendant Nauta is reminded to comply with all Court directives and deadlines. Signed by Judge Aileen M. Cannon on 6/4/2024. (jf01) (Entered: 06/04/2024)
06/04/2024	604	PAPERLESS ORDER granting Motions for Leave to Participate in Oral Argument as Amici Curiae 590 598 601 . The representatives designated in the respective filings (Josh Blackman, Gene C. Schaerr, and Matthew Seligman) will be permitted to appear on behalf of amici curiae and present oral argument at the June 21, 2024, hearing on

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		Defendant Trump's Motion to Dismiss the Indictment Based on the Unlawful Appointment of Special Counsel Jack Smith 326 . Approximately 30 minutes reserved for each. Seating to be reserved for representatives presenting argument. Signed by Judge Aileen M. Cannon on 6/4/2024. (jf01) (Entered: 06/04/2024)
06/05/2024	605	ORDER IN ANTICIPATION OF JUNE 2024 HEARINGS Signed by Judge Aileen M. Cannon on 6/5/2024. *See attached document for full details*. (tci) (Entered: 06/05/2024)
06/06/2024	606	MOTION for Leave to Present Oral Arguments by Jessica Nan Berk and Hilda Tobias Kennedy as Amici in Support of Defendant Donald J. Trump's Motion to Dismiss (ECF 326) Pursuant to the Court Order. Responses due by 6/20/2024. (Attachments: # 1 Exhibits, # 2 Proposed Order)(scn) (Entered: 06/07/2024)
06/07/2024	607	PAPERLESS ORDER denying 606 Motion for Leave to Present Oral Arguments. Signed by Judge Aileen M. Cannon on 6/7/2024. (jf01) (Entered: 06/07/2024)
06/10/2024	608	ORDER denying Defendants' Motion to Dismiss Indictment for Pleading Deficiencies and Granting in Part Motion to Strike 352 . Signed by Judge Aileen M. Cannon on 6/10/2024. *See attached document for full details*. (jf01) (Entered: 06/10/2024)
06/10/2024	609	STATUS REPORT by Donald J. Trump (Kise, Christopher) (Entered: 06/10/2024)
06/10/2024	610	MOTION for Extension of Time of the Deadline for Rule 16 Expert Disclosures by Donald J. Trump as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira. Responses due by 6/24/2024. (Kise, Christopher) (Entered: 06/10/2024)
06/10/2024	612	MOTION to Dismiss 85 Indictment, *based on Spoliation of Evidence in Violation of Due Process* by Donald J. Trump. Responses due by 6/24/2024. (Attachments: # 1 Exhibit 1, # 2 Exhibit 2, # 3 Exhibit 3, # 4 Exhibit 4, # 5 Exhibit 5, # 6 Exhibit 6, # 7 Exhibit 7, # 8 Exhibit 8, # 9 Exhibit 9, # 10 Exhibit 10, # 11 Exhibit 11, # 12 Exhibit 12, # 13 Exhibit 13, # 14 Exhibit 14, # 15 Exhibit 15, # 16 Exhibit 16)(Kise, Christopher) (Entered: 06/10/2024)
06/11/2024	613	PAPERLESS ORDER: In light of the parties' in camera representation to the Court, the Clerk is directed to **UNSEAL** Sealed Notice of Activity in the Disclosure and Transfer Proceeding 546 . Signed by Judge Aileen M. Cannon on 6/11/2024. (jf01) (Entered: 06/11/2024)
06/11/2024	614	PAPERLESS ORDER granting Defendants' Opposed Motion for Extension of the Deadline for Rule 16 Expert Disclosures 610 . For the reasons stated in the Motion, the Court finds that good cause exists for the extension request and that no prejudice to the Special Counsel or to the proceeding will result from granting the relief sought in the Motion. On or before **July 8, 2024**, Defendants shall file their Rule 16 expert disclosures. **Moving forward, any requests for extension or enlargement must be filed sufficiently in advance of the deadline at issue**. Signed by Judge Aileen M. Cannon on 6/11/2024. (jf01) (Entered: 06/11/2024)
06/11/2024	615	PAPERLESS ORDER granting Motion / Notice to Join and Adopt as to Defendant Nauta 611 . Nothing in this Order shall be construed as a comment on the merits of the applicable Motion 326 or its associated filings. Signed by Judge Aileen M. Cannon on 6/11/2024. (jf01) (Entered: 06/11/2024)
06/11/2024	616	SPEEDY TRIAL REPORT *Seventeenth Speedy Trial Report* by USA as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira (Bratt, Jay) (Entered: 06/11/2024)
06/11/2024	617	MOTION Supplemental Brief in Opposition to Defendant Donald J. Trump's Motion to Dismiss the Indictment Based on the Unlawful Appointment and Funding of Special Counsel Jack Smith re 326 MOTION to Dismiss 85 Indictment, *Based on the Unlawful Appointment and Funding of Special Counsel Jack Smith* by Constitutional Lawyers,

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		Former Government Officials, and State Democracy Defenders Action as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira. Responses due by 6/25/2024. (Attachments: # 1 Exhibit List of Amici Curiae)(Alonso, Cristina) (Entered: 06/11/2024)
06/11/2024	618	MOTION Supplemental Brief of Amici Curiae in Support of Defendant Trump's Motion to Dismiss re 326 MOTION to Dismiss 85 Indictment, *Based on the Unlawful Appointment and Funding of Special Counsel Jack Smith*, 588 Order,,,,,,, by Michael B. Mukasey, Citizens United Foundation, Citizens United, Gary Lawson, Steven Calabresi, Edwin Meese, III as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira. Attorney Edward H. Trent added to party Michael B. Mukasey(pty:ip). Responses due by 6/25/2024. (Trent, Edward) (Entered: 06/11/2024)
06/11/2024	619	Response *providing Supplemental Submission in Further Support of Motion to Dismiss Under the Appropriations Clause* by Donald J. Trump to 588 Order,,,,,,, (Kise, Christopher) (Entered: 06/11/2024)
06/11/2024	620	Government's Supplemental Brief Addressing the Supreme Court's Decision in Consumer Financial Protection Bureau v. Community Financial Services of America, Ltd. by USA as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira (Bratt, Jay) (Entered: 06/11/2024)
06/13/2024	621	NOTICE *of Filing* by USA as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira (Attachments: # 1 Exhibit Stamped Half Sheet) (Edelstein, Julie) (Entered: 06/13/2024)
06/14/2024	622	Memorandum in Opposition by Donald J. Trump re 592 MOTION to Modify Conditions of Release Replies due by 6/21/2024. (Kise, Christopher) (Entered: 06/14/2024)
06/16/2024	623	MOTION to File Amicus Brief by Henry Whitaker. by Donald J. Trump as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira. Responses due by 7/1/2024. (Attachments: # 1 Amicus brief, # 2 Proposed order to permit filing of amicus brief)(Whitaker, Henry) (Entered: 06/16/2024)
06/17/2024	624	PAPERLESS ORDER denying 623 Motion for Leave to File Brief as Amicus Curiae in Opposition to Special Counsel's Motion to Modify Conditions of Release 592 . Signed by Judge Aileen M. Cannon on 6/17/2024. (jf01) (Entered: 06/17/2024)
06/17/2024	625	NOTICE *of Filing* by Donald J. Trump re 530 Order, Set Hearings, Set/Reset Motion/R&R Deadlines and Hearings, Set Deadlines (Attachments: # 1 Exhibit) (Kise, Christopher) (Entered: 06/17/2024)
06/17/2024	626	MOTION for Leave to Submit Filings via ECF Portal on behalf of Amici Curiae Professor Seth Barrett Tillman and Landmark Legal Foundation as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira. Responses due by 7/1/2024. (scn) (Entered: 06/18/2024)
06/19/2024	627	Consent MOTION for Leave to File Excess Pages by USA as to Donald J. Trump. Responses due by 7/3/2024. (Bratt, Jay) (Entered: 06/19/2024)
06/20/2024	628	PAPERLESS ORDER granting Special Counsel's Unopposed Motion for Additional Pages 627 . Signed by Judge Aileen M. Cannon on 6/20/2024. (jf01) (Entered: 06/20/2024)
06/20/2024	629	PAPERLESS ORDER denying 626 Motion for Leave to Submit Electronic Filings, filed on behalf of Amici Curiae Professor Seth Barrett Tillman and Landmark Legal Foundation. Signed by Judge Aileen M. Cannon on 6/20/2024. (jf01) (Entered: 06/20/2024)
06/20/2024	630	MOTION FOR LEAVE TO FILE NOTICE OF SUPPLEMENTAL AUTHORITY IN SUPPORT OF DEFENDANT TRUMP'S MOTION TO DISMISS THE INDICTMENT

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		DE 326 by Landmark Legal Foundation as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira. Responses due by 7/8/2024. (ebz) (Entered: 06/20/2024)
06/20/2024	632	NOTICE of filing sealed ex parte Order Granting Relief Sought in Special Counsel's Fourth Classified Supplement to CIPA § 4 Motions. Signed by Judge Aileen M. Cannon on 6/20/2024. *See attached document for full details*. (jf01) (Entered: 06/20/2024)
06/20/2024	633	Unopposed MOTION to File Amicus Brief *and Incorporated Memorandum of Law* by Samuel J. Salario, Jr.. by America First Legal Foundation as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira. Responses due by 7/8/2024. (Attachments: # 1 Exhibit A - Amicus Curiae America First Legal's Brief in Support of Defendant Donald J. Trump's Opposition to the Government's Motion for Modification of Conditions of Release) (Salario, Samuel) (Entered: 06/20/2024)
06/20/2024	645	Brief In Support of Good Lawgic, LLC's Motion Seeking Leave to Appear Pro Hac Vice and to File Amicus Curiae Brief by Good Lawgic, LLC's. Responses due by 7/8/2024. (kpe) (Entered: 06/25/2024)
06/21/2024	634	Supplemental RESPONSE to Standing Discovery Order by USA as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira (Edelstein, Julie) (Entered: 06/21/2024)
06/21/2024	635	PAPERLESS Minute Entry for Hearing held before Judge Aileen M. Cannon on June 21, 2024. The Court heard argument from the parties on Defendant Trump's Motion to Dismiss the Indictment Based on the Unlawful Appointment of Special Counsel Jack Smith 326 . The Court also heard argument from three groups of non-party amici curiae authorized to appear via prior order 604 . On or before **June 24, 2024,** Defendant Trump and the Special Counsel each may file a separate notice of supplemental authority, **not to exceed five double-spaced pages,** with any discrete citations to statutory or decisional authority. The notice(s) shall be prepared in list/bullet form with citations only, and without advocacy, although appropriate headings are permitted for organizational purposes. No further filings from amici will be accepted. Total time in court: 4 hours. Attorney Appearances: James Pearce, Jay I. Bratt, David Harbach, Todd Blanche, Emil Bove, Christopher Kise, Stanley Woodward, Sasha Dadan, Larry Donald Murrell, Jr., John S. Irving. Other Appearances: Matthew Seligman, Josh Blackman, Gene C. Schaerr (counsel for amici). Court Reporter: Laura Melton, Laura_Melton@flsd.uscourts.gov. (jf01) (Entered: 06/21/2024)
06/21/2024	636	NOTICE OF ATTORNEY APPEARANCE: Kendra Leigh Wharton appearing for Donald J. Trump . Attorney Kendra Leigh Wharton added to party Donald J. Trump(pty:dft). (Wharton, Kendra) (Entered: 06/21/2024)
06/21/2024	637	PAPERLESS ORDER denying Motion for Leave to File Notice of Supplemental Authority in Support of Defendant Trump's Motion to Dismiss the Indictment 630 , filed on behalf of Amici Curiae Professor Seth Barrett Tillman and Landmark Legal Foundation. Signed by Judge Aileen M. Cannon on 6/21/2024. (jf01) (Entered: 06/21/2024)
06/21/2024	638	REPLY TO RESPONSE to Motion by USA as to Donald J. Trump re 592 MOTION to Modify Conditions of Release (Attachments: # 1 Exhibit Exhibit 1, # 2 Exhibit Exhibit 2, # 3 Exhibit Exhibit 3, # 4 Exhibit Exhibit 4, # 5 Exhibit Exhibit 5) (Bratt, Jay) (Entered: 06/21/2024)
06/22/2024	639	PAPERLESS ORDER denying 633 America First Legal's Unopposed Motion for Leave to Participate as Amicus Curiae in Opposition to Special Counsel's Motion for Modification of Conditions of Release 592 . Signed by Judge Aileen M. Cannon on 6/22/2024. (jf01) (Entered: 06/22/2024)

06/23/2024	640	NOTICE *Government's Supplemental Notice of Authority in Support of Its Opposition to Donald J. Trump's Motion to Dismiss Based on the Appointment and Funding of the Special Counsel* by USA as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira (Attachments: # 1 Exhibit Exhibit 1, # 2 Exhibit Exhibit 2, # 3 Exhibit Exhibit 3, # 4 Exhibit Exhibit 4, # 5 Exhibit Exhibit 5) (Bratt, Jay) (Entered: 06/23/2024)
06/24/2024	641	PAPERLESS ORDER: In accordance with the Court's prior Order 605 , the hearing scheduled for June 25, 2024, related to Defendant Trump's "Motion for Relief Relating to the Mar-a-Lago Raid and Unlawful Piercing of the Attorney-Client Privilege" 566 will commence in sealed session at 11:00 AM to protect materials as to which grand jury secrecy applies and/or as to which Defendant Trump asserts attorney-client privilege and/or work product protection. The hearing will resume in public fashion at approximately 1:00 PM or as soon as otherwise practicable. Signed by Judge Aileen M. Cannon on 6/24/2024. (jf01) (Entered: 06/24/2024)
06/24/2024	642	ADDITIONAL HEARING EXHIBITS (GX1 and GX2) Admitted in Support of Motion to Modify Conditions of Release 592 . (Entered: 06/24/2024)
06/24/2024	643	PAPERLESS ORDER and MINUTE ENTRY for Hearings held before Judge Aileen M. Cannon on June 24, 2024. The Court heard argument on (1) Defendant Trump's Motion to Dismiss the Indictment Based on the Unlawful Funding of Special Counsel Jack Smith 326 and (2) the Special Counsel's Motion for Modification of Conditions of Release 592 . Special Counsel admitted exhibits without objection 642 . Consistent with the instructions provided in open court, the evidentiary record on this Motion will be open until June 26, 2024, for the parties to file any additional evidentiary attachments/exhibits in support of, or in opposition to, the Motion 592 . Any attachments/exhibits shall be docketed as a "Notice of Filing" (separated by exhibits) and limited to specific evidentiary submissions only. No additional briefing will be permitted. Total time in court: 4 hours. Attorney Appearances: James Pearce, Jay I. Bratt, David Harbach, Todd Blanche, Emil Bove, Lazaro Fields, Kendra Wharton, Stanley Woodward, Sasha Dadan, Larry Donald Murrell, Jr., John S. Irving. Court Reporter: Laura Melton, Laura_Melton@flsd.uscourts.gov. (jf01) (Entered: 06/24/2024)
06/24/2024	644	Memorandum in Opposition by USA as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira re 612 MOTION to Dismiss 85 Indictment, *based on Spoliation of Evidence in Violation of Due Process* Replies due by 7/1/2024. (Attachments: # 1 Exhibit 1, # 2 Exhibit 2, # 3 Exhibit 3, # 4 Exhibit 4, # 5 Exhibit 5, # 6 Exhibit 6, # 7 Exhibit 7, # 8 Exhibit 8, # 9 Exhibit 9, # 10 Exhibit 10, # 11 Exhibit 11, # 12 Exhibit 12, # 13 Exhibit 13, # 14 Exhibit 14, # 15 Exhibit 15, # 16 Exhibit 16, # 17 Exhibit 17) (Bratt, Jay) (Entered: 06/24/2024)
06/25/2024	646	PAPERLESS ORDER denying 645 Motion Seeking Leave to Appear Pro Hac Vice and to File Amicus Curiae Brief in Opposition to Special Counsel's Motion to Modify Conditions of Release 592 . Signed by Judge Aileen M. Cannon on 6/25/2024. (jf01) (Entered: 06/25/2024)
06/26/2024	647	TRANSCRIPT of Motions as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira held on 6/21/2024 before Judge Aileen M. Cannon, 1-197 pages, Court Reporter: Laura Melton, 772-467-2327 / Laura_Melton@flsd.uscourts.gov. Transcript may be viewed at the court public terminal or purchased by contacting the Court Reporter/Transcriber before the deadline for Release of Transcript Restriction. After that date it may be obtained through PACER. Redaction Request due 7/17/2024. Redacted Transcript Deadline set for 7/29/2024. Release of Transcript Restriction set for 9/24/2024. (Melton, Laura) (Entered: 06/26/2024)

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06/26/2024	648	TRANSCRIPT of Motions - morning session as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira held on 6/24/2024 before Judge Aileen M. Cannon, 1-90 pages, Court Reporter: Laura Melton, 772-467-2327 / Laura_Melton@flsd.uscourts.gov. Transcript may be viewed at the court public terminal or purchased by contacting the Court Reporter/Transcriber before the deadline for Release of Transcript Restriction. After that date it may be obtained through PACER. Redaction Request due 7/17/2024. Redacted Transcript Deadline set for 7/29/2024. Release of Transcript Restriction set for 9/24/2024. (Melton, Laura) (Entered: 06/26/2024)
06/26/2024	649	TRANSCRIPT of Motions - afternoon session as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira held on 6/24/2024 before Judge Aileen M. Cannon, 1-77 pages, Court Reporter: Laura Melton, 772-467-2327 / Laura_Melton@flsd.uscourts.gov. Transcript may be viewed at the court public terminal or purchased by contacting the Court Reporter/Transcriber before the deadline for Release of Transcript Restriction. After that date it may be obtained through PACER. Redaction Request due 7/17/2024. Redacted Transcript Deadline set for 7/29/2024. Release of Transcript Restriction set for 9/24/2024. (Melton, Laura) (Entered: 06/26/2024)
06/26/2024	650	TRANSCRIPT of Motions - afternoon session as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira held on 6/25/2024 before Judge Aileen M. Cannon, 1-81 pages, Court Reporter: Laura Melton, 772-467-2327 / Laura_Melton@flsd.uscourts.gov. Transcript may be viewed at the court public terminal or purchased by contacting the Court Reporter/Transcriber before the deadline for Release of Transcript Restriction. After that date it may be obtained through PACER. Redaction Request due 7/17/2024. Redacted Transcript Deadline set for 7/29/2024. Release of Transcript Restriction set for 9/24/2024. (Melton, Laura) (Entered: 06/26/2024)
06/26/2024	651	NOTICE *of Filing in Opposition to Motion 592* by Donald J. Trump (Attachments: # 1 Exhibit 1, # 2 Exhibit 2, # 3 Exhibit 3, # 4 Exhibit 4, # 5 Exhibit 5, # 6 Exhibit 6, # 7 Exhibit 7, # 8 Exhibit 8, # 9 Exhibit 9, # 10 Exhibit 10, # 11 Exhibit 11) (Wharton, Kendra) (Entered: 06/26/2024)
06/26/2024	652	NOTICE *of Filing* by USA as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira re 638 Reply to Response, 592 MOTION to Modify Conditions of Release (Attachments: # 1 Exhibit 1, # 2 Exhibit 2, # 3 Exhibit 3, # 4 Exhibit 4, # 5 Exhibit 5, # 6 Exhibit 6, # 7 Exhibit 7, # 8 Exhibit 8, # 9 Exhibit 9, # 10 Exhibit 10, # 11 Exhibit 11) (Harbach, David) (Entered: 06/26/2024)
06/27/2024		SYSTEM ENTRY - Docket Entry 653 restricted/sealed until further notice. (amb) (Entered: 06/27/2024)
06/27/2024	654	Government's Opposition to Request for Response by USA as to Donald J. Trump (Bratt, Jay) (Entered: 06/27/2024)
06/27/2024	655	ORDER Denying Motion for Franks Hearing and Reserving Ruling on Balance of Motion Pending Necessary Factual Development 566 . Signed by Judge Aileen M. Cannon on 6/27/2024. *See attached document for full details*. (jf01) (Entered: 06/27/2024)
06/27/2024	656	PAPERLESS MINUTE ENTRY for Hearing held before Judge Aileen M. Cannon on June 25, 2024. The Court heard argument on Defendant Trump's "Motion for Relief Related to Mar-A-Lago Raid and Unlawful Piercing of Attorney-Client Privilege" 566 . Morning session conducted under seal to protect materials as to which grand jury secrecy applies and/or as to which Defendant Trump asserts attorney-client privilege or work product protection. Afternoon session reopened to the public. Total time in court: 4 hours. Attorney Appearances: Jay I. Bratt, David Harbach, John M. Pellettieri, Michael Thakur, Todd Blanche, Emil Bove, Lazaro Fields, Kendra Wharton, Stanley Woodward, Sasha

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		Dadam, Larry Donald Mantell, Jr., John S. Irving. Court Reporter: Laura Melton, Laura_Melton@flsd.uscourts.gov. (jf01) (Entered: 06/27/2024)
06/27/2024	657	PAPERLESS ORDER: In light of the extensive, newly submitted materials filed by the Special Counsel and Defendant Trump in support of and/or in opposition to the Special Counsel's Motion to Modify Conditions of Release 592 , the Court will permit the parties to file one final supplemental brief in response to those newly submitted materials, not to exceed 10 double-spaced pages, on or before **July 5, 2024**. The Court takes note of the additional court orders included in composite exhibit 11 to the Special Counsel's recently filed Notice 652 . Consistent with the Court's statements during the July 25, 2024, afternoon hearing 649 , the Court will consider such orders as cited legal authority on the Motion, not as part of the developed evidentiary record in this proceeding, and not for the factual findings set forth in those separate proceedings. The evidentiary record on the Motion is closed. Absent leave of Court, no further exhibits shall be attached to the authorized final supplemental briefs. Signed by Judge Aileen M. Cannon on 6/27/2024. (jf01) (Entered: 06/27/2024)
06/28/2024		SYSTEM ENTRY - Docket Entry 658 restricted/sealed until further notice. (amb) (Entered: 06/28/2024)
06/28/2024	659	Consent MOTION for Extension of Time to File Supplemental Expert Disclosures by USA as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira. Responses due by 7/12/2024. (Bratt, Jay) (Entered: 06/28/2024)
07/01/2024	660	PAPERLESS ORDER granting Consent Motion for Extension of Time to File Rule 16 Expert Disclosures 659 . **On or before July 30, 2024,** the Special Counsel shall file supplemental expert disclosures. Signed by Judge Aileen M. Cannon on 7/1/2024. (jf01) (Entered: 07/01/2024)
07/01/2024	661	REPLY TO RESPONSE to Motion by Donald J. Trump re 612 MOTION to Dismiss 85 Indictment, *based on Spoliation of Evidence in Violation of Due Process* (Wharton, Kendra) (Entered: 07/01/2024)
07/02/2024	662	SPEEDY TRIAL REPORT *Eighteenth Speedy Trial Report* by USA as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira (Bratt, Jay) (Entered: 07/02/2024)
07/05/2024	663	NOTICE of Supplemental Authority re 326 MOTION to Dismiss 85 Indictment, *Based on the Unlawful Appointment and Funding of Special Counsel Jack Smith*, 324 MOTION to Dismiss 85 Indictment, *Based On Presidential Immunity* by Donald J. Trump (Wharton, Kendra) (Entered: 07/05/2024)
07/05/2024	664	MOTION for Leave to File *Supplemental Briefing re the Implications of Trump v. United States re 324 MOTION to Dismiss 85 Indictment, Based On Presidential Immunity*, MOTION to Stay *Further Proceedings until 324 MOTION to Dismiss 85 Indictment, Based On Presidential Immunity, and 326 MOTION to Dismiss 85 Indictment, Based on the Unlawful Appointment and Funding of Special Counsel Jack Smith, are Resolved* by Donald J. Trump as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira. Responses due by 7/19/2024. (Attachments: # 1 Exhibit A, # 2 Exhibit B)(Wharton, Kendra) (Entered: 07/05/2024)
07/05/2024	665	Response *Government's Supplemental Brief re Motion to Modify Conditions of Relief* by USA as to Donald J. Trump (Bratt, Jay) (Entered: 07/05/2024)
07/05/2024	666	Response *In Opposition to 652 NOTICE of Filing by USA as to 592 MOTION to Modify Conditions of Release* by Donald J. Trump to 652 Notice (Other), (Wharton, Kendra) (Entered: 07/05/2024)

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07/05/2024	667	Consent MOTION for Leave to File Excess Pages by USA as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira. Responses due by 7/19/2024. (Bratt, Jay) (Entered: 07/05/2024)
07/05/2024	668	PAPERLESS ORDER granting 667 Special Counsel's Unopposed Motion for Leave to File Overlength CIPA Submission. Signed by Judge Aileen M. Cannon on 7/5/2024. (AMC) (Entered: 07/05/2024)
07/06/2024	669	PAPERLESS ORDER temporarily granting in part and reserving ruling in part on Defendant Trump's Motion for Supplemental Briefing on Presidential Immunity and a Partial Stay 664 . In order to allow for full briefing on the Motion, and consistent with the Special Counsel's request for the standard response period, the Court stays the following impending deadlines: Defendants' Rule 16 expert disclosures, currently due July 8, 2024; Defendants' reciprocal discovery, currently due July 10, 2024; and Special Counsel's CIPA §§ 5-6 submission, currently due July 10, 2024, although the Special Counsel may proceed with filing should it so elect. On or before July 18, 2024, the Special Counsel shall respond to Defendant Trump's Motion to Stay and Request for Supplemental Briefing on Presidential Immunity. Any reply is due July 21, 2024. The Court reserves ruling on the request for additional briefing pending receipt of the Special Counsel's response and Defendants' reply. No other deadlines are impacted by this Order. Signed by Judge Aileen M. Cannon on 7/6/2024. (jf01) (Entered: 07/06/2024)
07/06/2024	670	ORDER denying 485 Defendant Nauta's Motion to Dismiss Superseding Indictment for Selective and Vindictive Prosecution. Signed by Judge Aileen M. Cannon on 7/6/2024. *See attached document for full details*. (jf01) (Entered: 07/06/2024)
07/12/2024	671	NOTICE of Supplemental Authority *in Response* re 663 Notice of Supplemental Authority, by USA as to Donald J. Trump (Harbach, David) (Entered: 07/12/2024)
07/15/2024	672	ORDER GRANTING DEFENDANTS' MOTION TO DISMISS SUPERSEDING INDICTMENT BASED ON APPOINTMENTS CLAUSE VIOLATION. Signed by Judge Aileen M. Cannon on 7/15/2024. *See attached document for full details*. (jf01) (Entered: 07/15/2024)
07/17/2024	673	NOTICE OF APPEAL re DE 672 Order by USA as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira Filing fee $ 605.00. USA/FPD Filer - No Filing Fee Required. Within fourteen days of the filing date of a Notice of Appeal, the appellant must complete the Eleventh Circuit Transcript Order Form regardless of whether transcripts are being ordered [Pursuant to FRAP 10(b)]. For information go to our FLSD website under All Forms and look for Transcript Order Form www.flsd.uscourts.gov/forms/all-forms. (Bratt, Jay) Modified text on 7/18/2024 to create docket entry relationship (apz). (Entered: 07/17/2024)
07/18/2024		Transmission of Notice of Appeal, Order under appeal, and Docket Sheet as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira to US Court of Appeals re 673 Notice of Appeal - Final Judgment, Notice has been electronically mailed. (apz) (Entered: 07/18/2024)
07/18/2024	674	Acknowledgment of Receipt of NOA from USCA as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira re 673 Notice of Appeal - Final Judgment, date received by USCA: 7/18/2024. USCA Case Number: 24-12311-J. (apz) (Entered: 07/18/2024)
07/24/2024	675	TRANSCRIPT ORDER FORM as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira re 673 Notice of Appeal - Final Judgment,, filed by USA. No Transcript Requested. (Pearce, James) (Entered: 07/24/2024)
11/04/2024	676	Pursuant to 11th Cir. R. 11-2 and 11th Cir. R. 11-3, the Clerk of the District Court for the Southern District of Florida certifies that the record is complete for purposes of this

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		appeal re: 673 Notice of Appeal - Final Judgment, Appeal No. 24-12311-SS. The entire record on appeal is available electronically. (apz) (Entered: 11/04/2024)
11/26/2024	677	ORDER of DISMISSAL from USCA (certified copy). Appellant's motion to dismiss the appeal as to Donald J. Trump only is GRANTED re 673 Notice of Appeal - Final Judgment. USCA 24-12311-SS (jgo) (Entered: 11/26/2024)
01/07/2025	680	NOTICE by USA as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira re 679 Joint EMERGENCY MOTION with Certification of Emergency included (Pearce, James) (Entered: 01/07/2025)
01/07/2025	681	MOTION to Intervene or, Alternatively, to Participate as Amicus Curiae by Donald J. Trump as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira. Responses due by 1/21/2025. (Wharton, Kendra) (Entered: 01/07/2025)
01/07/2025	683	NOTICE OF ATTORNEY APPEARANCE Elizabeth Jane Shapiro appearing for USA. . Attorney Elizabeth Jane Shapiro added to party USA(pty:pla). (Shapiro, Elizabeth) (Entered: 01/07/2025)
01/07/2025	684	Second NOTICE *in Response to Emergency Motion* by USA as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira (Shapiro, Elizabeth) (Entered: 01/07/2025)
01/09/2025	685	NOTICE *of Filing* by Donald J. Trump as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira (Attachments: # 1 Exhibit A) (Wharton, Kendra) (Entered: 01/09/2025)
01/09/2025	686	NOTICE OF APPEAL by USA as to Waltine Nauta, Carlos De Oliveira Re: 682 Order. Filing fee $ 605.00. USA/FPD Filer - No Filing Fee Required. Within fourteen days of the filing date of a Notice of Appeal, the appellant must complete the Eleventh Circuit Transcript Order Form regardless of whether transcripts are being ordered [Pursuant to FRAP 10(b)]. For information go to our FLSD website under All Forms and look for Transcript Order Form www.flsd.uscourts.gov/forms/all-forms. (Shapiro, Elizabeth) Modified text on 1/13/2025 (apz). (Entered: 01/09/2025)
01/10/2025	687	Counter NOTICE by USA as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira re 685 Notice (Other) (Shapiro, Elizabeth) (Entered: 01/10/2025)
01/10/2025	688	Corrected NOTICE by USA as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira re 685 Notice (Other) (Shapiro, Elizabeth) (Entered: 01/10/2025)
01/10/2025		Transmission of Notice of Appeal, Order under appeal, and Docket Sheet as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira to US Court of Appeals re 686 Notice of Appeal - Other Order, Notice has been electronically mailed. (apz) (Entered: 01/10/2025)
01/10/2025	695	Acknowledgment of Receipt of NOA from USCA as to Waltine Nauta and Carlos De Oliveira re 686 Notice of Appeal - Other Order, date received by USCA: 1/10/2025. USCA Case Number: 25-10076-G. (apz) (Entered: 01/13/2025)
01/11/2025	690	Response/Memorandum in Opposition *to Defendants' Motion for Further Stay* by USA as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira (Attachments: # 1 Exhibit 1, # 2 Exhibit 2, # 3 Exhibit 3, # 4 Exhibit 4) (Shapiro, Elizabeth) (Entered: 01/11/2025)
01/12/2025	692	Response *to Court Order* by USA as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira (Shapiro, Elizabeth) (Entered: 01/12/2025)
01/13/2025	699	NOTICE by USA as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira (Shapiro, Elizabeth) (Entered: 01/13/2025)
01/13/2025	700	SUPPLEMENT to 681 MOTION to Intervene or, Alternatively, to Participate as Amicus Curiae filed by Donald J. Trump by Donald J. Trump as to Donald J. Trump, Waltine

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		Nauta, Carlos De Oliveira (*Emergency Ruling Requested*) (Singer, Gregory) (Entered: 01/13/2025)
01/13/2025	701	RESPONSE in Opposition by USA as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira re 681 MOTION to Intervene or, Alternatively, to Participate as Amicus Curiae *Response to Supplement* Replies due by 1/21/2025. (Shapiro, Elizabeth) (Entered: 01/13/2025)
01/13/2025	702	PAPERLESS ORDER denying President-Elect Trump's Motion to Intervene as to Volume I of Special Counsel's Final Report 681 and Emergency Supplement 700 . The Court has reviewed the Motion and the Emergency Supplement 700 . Consistent with the Court's Order Denying in Part the Emergency Motion filed by Defendants Nauta and De Oliveira as to Volume I 697 , and in light of the United States' clarifications affirming the severability of Volumes I and II 692 , the Motion to Intervene is denied as to Volume I and reserved on the balance of the Motion, including the alternative request for amicus participation as to Volume II. As indicated 697 , the Order Granting Defendants' Motion to Dismiss the Superseding Indictment is confined to this proceeding 672 , as is this Court's authority to enforce its own orders in this proceeding. The Court is therefore constrained to deny the present request for emergency relief, expressing no opinion on the merits of the arguments in the Motion to Intervene as to Volume I or on the United States' asserted urgency in releasing Volume I. Signed by Judge Aileen M. Cannon on 1/13/2025. (AMC) (Entered: 01/13/2025)
01/14/2025	703	Response *to Defendants' Emergency Motion* by USA as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira (Shapiro, Elizabeth) (Entered: 01/14/2025)
01/15/2025	704	PAPERLESS ORDER denying as moot Defendants' 689 Motion to Extend Temporary Injunction Granted in January 7, 2025 Order 682 . Signed by Judge Aileen M. Cannon on 1/15/2025. (tci) (Entered: 01/15/2025)
01/15/2025	705	PAPERLESS ORDER in anticipation of January 17, 2025, hearing 697 . Parties and prospective intervenor President-Elect Trump are advised as follows. First, the Court is prepared to hear argument on President-Elect Trump's Motion to Intervene as to Volume II 681 . Accordingly, on or before January 16, 2025, counsel for President-Elect Trump shall file a notice advising of his intent to present argument as to Volume II only, and if argument is requested, specifying the name of counsel designated to present argument during the hearing. Second, to facilitate the Court's review of Defendants' Joint Emergency Motion as narrowed by the Court's Order 679 697 , the United States is directed, on or before 2 p.m. on January 16, 2025, to hand deliver a copy of Volume II to the Court to be reviewed in camera. Counsel shall contact chambers via email for the limited purpose of arranging delivery and shall communicate promptly with the Classified Information Security Officer in this matter to the extent Volume II contains classified information. Further, counsel for the United States shall provide a reasonable opportunity for Defendants' counsel to further review Volume II prior to the hearing, if that opportunity is requested by Defendants' counsel. This hearing is a public hearing, but any discussions of specified content in Volume II will be conducted in closed, sealed session to preserve Defendants' fair trial rights and to fully respect protective orders previously entered in this case. Signed by Judge Aileen M. Cannon on 1/15/2025. (AMC) (Entered: 01/15/2025)
01/15/2025	706	PAPERLESS ORDER denying as moot and/or alternatively denying 696 Motion of Jeffrey B. Clark for Leave to File as Amicus Curiae. Signed by Judge Aileen M. Cannon on 1/15/2025. (AMC) (Entered: 01/15/2025)

01/15/2025	707	NOTICE *Regarding January 17, 2025, Hearing* by Donald J. Trump as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira re 705 Order,,,,,, (Singer, Gregory) (Entered: 01/15/2025)
01/16/2025	708	NOTICE of Compliance by USA as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira re 705 Order,,,,,, (Shapiro, Elizabeth) (Entered: 01/16/2025)
01/16/2025	710	RESPONSE in Opposition by USA as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira re 681 MOTION to Intervene or, Alternatively, to Participate as Amicus Curiae Replies due by 1/23/2025. (Shapiro, Elizabeth) (Entered: 01/16/2025)
01/16/2025	711	REPLY in Support of Motion by Donald J. Trump as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira re 681 MOTION to Intervene or, Alternatively, to Participate as Amicus Curiae . (Singer, Gregory) (Entered: 01/16/2025)
01/20/2025	713	PAPERLESS MINUTE ENTRY for Hearing held before Judge Aileen M. Cannon on January 17, 2025. The Court heard argument on Defendants' Emergency Motion to Preclude Release of Volume II of Special Counsel's Report 679 , as well as President-Elect Trump's Motion to Intervene or Alternative Request to Participate as Amicus 681 . The hearing was held publicly except for a brief session to discuss specified contents of Volume II with designated counsel. Motions taken under advisement for expedited consideration. Total time in court: 2 hours. Attorney Appearances for the Government: Elizabeth J. Shapiro, Brian M. Boynton, Markenzy Lapointe. Attorney Appearances for Defendants: Stanley Woodward, Richard C. Klugh, Larry Donald Murrell Jr., John S. Irving. Attorney Appearances for prospective-intervenor President-Elect Trump: John Lauro, Gregory M. Singer. Court Reporter: Laura Melton, Laura_Melton@flsd.uscourts.gov. (jco) (Entered: 01/20/2025)
01/21/2025	714	ORDER GRANTING DEFENDANTS' EMERGENCY MOTION TO PRECLUDE RELEASE OF VOLUME II OF SPECIAL COUNSEL'S REPORT AND DENYING WITHOUT PREJUDICE MOTION TO INTERVENE AS TO VOLUME II. Signed by Judge Aileen M. Cannon on 1/21/2025. *See attached document for full details*. (tci) (Entered: 01/21/2025)
01/31/2025	715	NOTICE *of Withdrawal as Attorney* by USA as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira (Shapiro, Elizabeth) (Entered: 01/31/2025)
02/11/2025	716	ORDER of DISMISSAL from USCA (certified copy). Appellant's "Unopposed Motion to Dismiss Appeal" is GRANTED. This appeal is DISMISSED as to Waltine Nauta, Carlos De Oliveira re 673 Notice of Appeal - Final Judgment. USCA #24-12311-SS. (apz) (Entered: 02/11/2025)
02/14/2025	717	AMERICAN OVERSIGHT'S EXPEDITED MOTION TO INTERVENE AND FORCLARIFICATION OR, ALTERNATIVELY, DISSOLUTION OF JANUARY 21, 2025 ORDER GRANTING DEFENDANTS' EMERGENCY MOTION TO PRECLUDE RELEASE OF VOLUME II OF SPECIAL COUNSEL'S REPORT. Responses due by 2/28/2025. (amb) (Entered: 02/18/2025)
02/18/2025	718	PAPERLESS ORDER denying in part and reserving ruling in part on American Oversight's "Expedited Motion to Intervene and for Clarification or, Alternatively, Dissolution of January 21, 2025 Order Granting Defendants' Emergency Motion to Preclude Release of Volume II of Special Counsel's Report" 717 . In the Motion, non-party and prospective intervenor American Oversight seeks an order "clarifying" that the Court's January 21, 2025, Order "ceased to operate" upon conclusion of the Special Counsel's Appeal of the Court's Order Granting Defendants' Motion to Dismiss Superseding Indictment 672 716 717 . Alternatively, American Oversight requests an order "immediately lift[ing]" the Court's January 21 Order 717 . Without ruling on the

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		merits of the intervention or dissolution requests, the Court notes as follows. The Court's January 21, 2025, Order 714 remains in effect per the clear terms of that Order, which states, in relevant part, as follows: "This Order remains in effect pending further Court order, limited as follows. No later than thirty days after full conclusion of all appellate proceedings in this action and/or any continued proceedings in this Court, whichever comes later, the parties shall submit a joint status report advising of their position on this Order, consistent with any remaining Rule 6(e) challenges or other claims or rights concerning Volume II, as permitted by law" [714 pp. 13-14]. The Court awaits briefing on American Oversight's Motion in the normal course, according to the standard deadlines set forth in Local Rules 88.9 and 7.1. To the extent American Oversight seeks what amounts to an emergency ruling on its Motion this week, the Court sees an insufficient basis to warrant expedited or emergency treatment of the Motion. The status report deadline remains in effect, as previously dictated. Signed by Judge Aileen M. Cannon on 2/18/2025. (jco) (Entered: 02/18/2025)
02/24/2025	721	MOTION of the Knight First Amendment Institute at Columbia University to Intervene to Seek Rescission of the Court's January 21, 2025 Order and Public Release of Volume II of the Special Counsel's Report. Responses due by 3/10/2025. (nan) (Entered: 02/25/2025)
02/27/2025	724	Clerk's Notice of Docket Correction re 722 Affidavit. **Document Filed in Wrong Case**; Document restricted and docket text modified. (nan) (Entered: 02/27/2025)
02/28/2025	726	ORDER GRANTING 723 UNOPPOSED MOTION FOR EXTENSION OF TIME AND SETTING OTHER DEADLINES. Signed by Judge Aileen M. Cannon on 2/28/2025. *See attached document for full details*. (bbk) (Entered: 02/28/2025)
02/28/2025	727	NOTICE OF ATTORNEY APPEARANCE Michael David Porter appearing for USA. . Attorney Michael David Porter added to party USA(pty:pla). (Porter, Michael) (Entered: 02/28/2025)
03/06/2025	729	MOTION to Appear Pro Hac Vice, Consent to Designation, and Request to Electronically Receive Notices of Electronic Filing for Scott Wilkens. Filing Fee $ $250.00 Receipt # 299528 by David M. Buckner, Esq. for Donald J. Trump, Waltine Nauta, Carlos De Oliveira. Responses due by 3/20/2025. (nan) (Additional attachment(s) added on 3/11/2025: # 1 Proposed Order) (nan). (Entered: 03/11/2025)
03/06/2025	730	CERTIFICATION of Scott Wilkens re 729 MOTION to Appear Pro Hac Vice, Consent to Designation, and Request to Electronically Receive Notices of Electronic Filing for Scott Wilkens. Filing Fee $ $250.00 Receipt # 299528 by Donald J. Trump, Waltine Nauta, Carlos De Oliveira (nan) (Entered: 03/11/2025)
03/06/2025	731	MOTION to Appear Pro Hac Vice, Consent to Designation, and Request to Electronically Receive Notices of Electronic Filing for Jameel Jaffer. Filing Fee $ $250.00 Receipt # 299527 by David M. Buckner, Esq., Donald J. Trump, Waltine Nauta, Carlos De Oliveira. Responses due by 3/20/2025. (nan) (Additional attachment(s) added on 3/11/2025: # 1 Proposed Order) (nan). (Entered: 03/11/2025)
03/06/2025	732	CERTIFICATION of Jameel Jaffer re 731 MOTION to Appear Pro Hac Vice, Consent to Designation, and Request to Electronically Receive Notices of Electronic Filing for Jameel Jaffer. Filing Fee $ $250.00 Receipt # 299527 by Donald J. Trump, Waltine Nauta, Carlos De Oliveira (nan) (Entered: 03/11/2025)
03/06/2025	733	MOTION to Appear Pro Hac Vice, Consent to Designation, and Request to Electronically Receive Notices of Electronic Filing for Anna Diakun. Filing Fee $ $250.00 Receipt # 299526 by David M. Buckner, Esq., Donald J. Trump, Waltine Nauta, Carlos De Oliveira. Responses due by 3/20/2025. (Attachments: # 1 Proposed Order)(nan) (Entered: 03/11/2025)

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03/06/2025	734	CERTIFICATION of Anna Diakun re 733 MOTION to Appear Pro Hac Vice, Consent to Designation, and Request to Electronically Receive Notices of Electronic Filing for Anna Diakun. Filing Fee $ $250.00 Receipt # 299526 by Donald J. Trump, Waltine Nauta, Carlos De Oliveira (nan) (Entered: 03/11/2025)
03/07/2025	728	MOTION for Extension of Time to File Response as to 721 MOTION MOTION of the Knight First Amendment Institute at Columbia University to Intervene to Seek Rescission of the Court's January 21, 2025 Order and Public Release of Volume II of the Special Counsel's Report, 717 MOTION for Clarification by USA as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira. Responses due by 3/21/2025. (Porter, Michael) (Entered: 03/07/2025)
03/11/2025	735	PAPERLESS ORDER granting 728 Motion for Extension of Time. Signed by Judge Aileen M. Cannon on 3/11/2025. (AMC) (Entered: 03/11/2025)
03/12/2025	736	UNOPPOSED MOTION of the Knight First Amendment Institute at Columbia University and American Oversight for Leave to File Reply Briefs of not More than Fifteen Pages Each by March 31, 2025. by Adam M. Schachter and David M. Buckner. Responses due by 3/26/2025. (nan) (Entered: 03/13/2025)
03/13/2025	737	PAPERLESS ORDER granting 736 Prospective Intervenors Knight Institute and American Oversight's Unopposed Motion for Leave Regarding Reply Briefs. On or before **March 31, 2025**, Knight Institute and American Oversight shall each file consolidated reply briefs in support of their respective Motions 717 721 , with the body of each reply brief not to exceed fifteen double-spaced pages. Signed by Judge Aileen M. Cannon on 3/13/2025. (jco) (Entered: 03/13/2025)
03/13/2025	741	MOTION to Appear Pro Hac Vice, Consent to Designation, and Request to Electronically Receive Notices of Electronic Filing for Loree Stark. Filing Fee $ 250.00 Receipt # 299853 Responses due by 3/27/2025. (nan) (Entered: 04/08/2025)
03/13/2025	742	CERTIFICATION of Loree Stark re 741 MOTION to Appear Pro Hac Vice, Consent to Designation, and Request to Electronically Receive Notices of Electronic Filing for Loree Stark. Filing Fee $ 250.00 Receipt # 299853 (nan) (Entered: 04/08/2025)
03/13/2025	743	MOTION to Appear Pro Hac Vice, Consent to Designation, and Request to Electronically Receive Notices of Electronic Filing for Elizabeth Haddix. Filing Fee $ 250.00 Receipt # 299853. Responses due by 3/27/2025. (nan) (Entered: 04/08/2025)
03/13/2025	744	CERTIFICATION of Elizabeth Haddix re 743 MOTION to Appear Pro Hac Vice, Consent to Designation, and Request to Electronically Receive Notices of Electronic Filing for Elizabeth Haddix. Filing Fee $ 250.00 Receipt # 299853. (nan) (Entered: 04/08/2025)
03/14/2025	738	STATUS REPORT *(Joint)* by USA as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira (Porter, Michael) (Entered: 03/14/2025)
03/24/2025	740	RESPONSE in Opposition by USA as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira re 721 MOTION MOTION of the Knight First Amendment Institute at Columbia University to Intervene to Seek Rescission of the Court's January 21, 2025 Order and Public Release of Volume II of the Special Counsel's Report, 717 MOTION for Clarification Replies due by 3/31/2025. (Porter, Michael) (Entered: 03/24/2025)
03/31/2025	745	REPLY by the Knight First Amendment Institute at Columbia University in Support of its Motion to Intervene re 721 MOTION of the Knight First Amendment Institute at Columbia University to Intervene to Seek Rescission of the Court's January 21, 2025 Order and Public Release of Volume II of the Special Counsel's Report. (nan) (Entered: 04/08/2025)

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03/31/2025	746	American Oversight's Consolidated REPLY to Former Defendants' and the United States' Opposition to its Motion to Intervene and Lift Injunction re 740 Response in Opposition, (nan) (Entered: 04/08/2025)
04/22/2025	747	CLERK'S NOTICE - PHV Attorney(s) have been added to this case as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira re: 741 and 743 MOTION to Appear Pro Hac Vice, Consent to Designation, and Request to Electronically Receive Notices of Electronic Filing. (jc). (Entered: 04/22/2025)
04/22/2025	748	PAPERLESS ORDER granting 743 741 733 731 729 Motions to Appear Pro Hac Vice, Consents to Designation, and Requests to Electronically Receive Notices of Electronic Filing for Attorneys Elizabeth Haddix, Loree Stark, Anna Diakun, Jameel Jaffer, and Scott Wilkens. The Court reserves the power to withdraw permission for special appearance at any time. Failure to abide by any court order or failure to appear at any scheduled matter may result in immediate revocation of counsel's pro hac vice status. Nothing in this Order should be construed as granting party status or otherwise ruling on the pending Motions to Intervene 717 721 . Signed by Judge Aileen M. Cannon on 4/18/2025. (ane) (Entered: 04/22/2025)
04/22/2025	749	CLERK'S NOTICE - PHV Attorney(s) have been added to this case as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira re: 729 , 731 and 733 MOTION to Appear Pro Hac Vice, Consent to Designation, and Request to Electronically Receive Notices of Electronic Filing. Regarding ECF No. 748 PAPERLESS ORDER granting 743 741 733 731 729 [Motions to Appear Pro Hac Vice, Consents to Designation, and Requests to Electronically Receive Notices of Electronic Filing for Attorneys Elizabeth Haddix, Loree Stark, Anna Diakun, Jameel Jaffer, and Scott Wilkens. The Court reserves the power to withdraw permission for special appearance at any time. Failure to abide by any court order or failure to appear at any scheduled matter may result in immediate revocation of counsel's pro hac vice status. Nothing in this Order should be construed as granting party status or otherwise ruling on the pending Motions to Intervene 717 721 . Signed by Judge Aileen M. Cannon on 4/18/2025. Additional Notice of Electronic Filing (NEF) sent to Anna Diakun, Jameel Jaffer, and Scott Wilkens. (jc) (Entered: 04/22/2025)
07/07/2025	750	Notice of Ninety Days Expiring by Kinght First Amendment Institute at Columbia University re 721 MOTION MOTION of the Knight First Amendment Institute at Columbia University to Intervene to Seek Rescission of the Court's January 21, 2025 Order and Public Release of Volume II of the Special Counsel's Report (Buckner, David) (Entered: 07/07/2025)
07/10/2025	751	Notice of Ninety Days Expiring *regarding American Oversight's Motion to Intervene* by American Oversight re 717 MOTION for Clarification (Llanes, Barbara) (Entered: 07/10/2025)
12/01/2025	752	NOTICE OF ATTORNEY APPEARANCE Manolo Reboso appearing for USA. . Attorney Manolo Reboso added to party USA(pty:pla). (Reboso, Manolo) (Entered: 12/01/2025)
12/01/2025	753	STATUS REPORT *(Joint)* by USA as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira (Attachments: # 1 Exhibit Exhibit A - Order Holding in Abeyance) (Reboso, Manolo) (Entered: 12/01/2025)
12/02/2025	754	NOTICE of Change of Address/Contact Information; by Kendra Leigh Wharton as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira (Wharton, Kendra) (Entered: 12/02/2025)
12/02/2025	755	MOTION for Leave to Participate as Amicus Curiae re 721 MOTION MOTION of the Knight First Amendment Institute at Columbia University to Intervene to Seek Rescission

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		of the Court's January 21, 2025 Order and Public Release of Volume II of the Special Counsel's Report, 717 MOTION for Clarification by Donald J. Trump as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira. Responses due by 12/16/2025. (Wharton, Kendra) Modified on 12/15/2025 (mf). (Entered: 12/02/2025)
12/02/2025	756	CLERK'S NOTICE - Attorney Admissions has not updated address and/or email information for attorney Kendra Leigh Wharton as to Donald J. Trump re 754 Notice of Change of Address, Email or Law Firm Name. Attorney Kendra Leigh Wharton has not completed the required procedures for updating their information with the Court. After filing something in any pending cases, Attorney is instructed to go to their PACER account, Manage My Account, to complete the process of updating their information. The Court is NOT responsible for updating secondary email addresses. See the Courts website for detailed instructions. www.flsd.uscourts.gov/updating-your-information (pt) (Entered: 12/02/2025)
12/14/2025	759	PAPERLESS ORDER granting 755 Donald J. Trump's Motion for Leave to Participate as Amicus curiae. No additional filings are permitted by this Order. Signed by Judge Aileen M. Cannon on 12/14/2025. (AMC) (Entered: 12/14/2025)
12/22/2025	760	ORDER DENYING 717 721 NON-PARTY MOTIONS TO INTERVENE. Upon review of the Motions, Responses, and Replies, and fully advised in the premises, both 717 American Oversight's Motion to Intervene and 721 the Knight First Amendment Institute's Motion to Intervene are DENIED. Signed by Judge Aileen M. Cannon on 12/22/2025. *See attached document for full details*. (Entered: 12/22/2025)
12/22/2025	761	ORDER FOLLOWING 738 JOINT STATUS REPORT AND ADDRESSING 714 JANUARY 21, 2025 ORDER. Signed by Judge Aileen M. Cannon on 12/22/2025. *See attached document for full details*. (nct) (Entered: 12/22/2025)
12/23/2025	762	NOTICE OF APPEAL by Kinght First Amendment Institute at Columbia University as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira Re: 760 Order on Motion for Clarification,, Order on Motion for Miscellaneous Relief,. Filing fee $ 605.00 receipt number FLSDC-19069109. Within fourteen days of the filing date of a Notice of Appeal, the appellant must complete the Eleventh Circuit Transcript Order Form regardless of whether transcripts are being ordered [Pursuant to FRAP 10(b)]. For information go to our FLSD website under All Forms and look for Transcript Order Form www.flsd.uscourts.gov/forms/all-forms. (Buckner, David) (Entered: 12/23/2025)
12/29/2025		Transmission of Notice of Appeal, Order under appeal, and Docket Sheet as to Donald J. Trump to US Court of Appeals re 762 Notice of Appeal - Other Order. Notice has been electronically mailed. (jgo) (Entered: 12/29/2025)
12/29/2025	763	NOTICE OF APPEAL by American Oversight as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira Re: 760 Order on Motion for Clarification,, Order on Motion for Miscellaneous Relief,. Filing fee $ 605.00 receipt number FLSDC-19077018. Within fourteen days of the filing date of a Notice of Appeal, the appellant must complete the Eleventh Circuit Transcript Order Form regardless of whether transcripts are being ordered [Pursuant to FRAP 10(b)]. For information go to our FLSD website under All Forms and look for Transcript Order Form www.flsd.uscourts.gov/forms/all-forms. (Llanes, Barbara) (Entered: 12/29/2025)
12/30/2025		Transmission of Notice of Appeal, Order under appeal, and Docket Sheet as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira to US Court of Appeals re 763 Notice of Appeal - Other Order. Notice has been electronically mailed. (jgo) (Entered: 12/30/2025)

12/31/2025	764	Acknowledgment of Receipt of NOA from USCA as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira re 762 Notice of Appeal - Other Order, date received by USCA: 12/29/2025. USCA Case Number: 25-14507-A. (jgo) (Entered: 12/31/2025)
12/31/2025	765	Acknowledgment of Receipt of NOA from USCA as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira re 763 Notice of Appeal - Other Order, date received by USCA: 12/30/25. USCA Case Number: 25-14507-A. (jgo) (Entered: 12/31/2025)
01/08/2026	766	TRANSCRIPT ORDER FORM as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira re 762 Notice of Appeal - Other Order,, filed by Kinght First Amendment Institute at Columbia University. Transcript Requested. Counsel/Party submitting transcript order form: David M. Buckner. Link to Circuit Transcript Order Form PDF sent to: Court Reporter Laura Melton,. **Payment Status: Satisfactory Arrangements for Payment Made**. (Buckner, David) (Entered: 01/08/2026)
01/08/2026	767	COURT REPORTER ACKNOWLEDGMENT as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira re 762 Notice of Appeal - Other Order,, 766 **Circuit Transcript Order Form**,. Court Reporter: Laura Melton, 772-467-2327 / Laura_Melton@flsd.uscourts.gov. Estimated filing date of transcript 01/18/2026. USCA number 25-14507. (Melton, Laura) (Main Document 767 replaced on 1/9/2026 to correct hearing date) (apz). (Entered: 01/08/2026)
01/12/2026	769	TRANSCRIPT NOTIFICATION as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira - Transcript(s) ordered on: 1/8/2026 by David Buckner, Esq. has/have been filed by Court Reporter: Laura Melton, 772-467-2327 / Laura_Melton@flsd.uscourts.gov re 762 Notice of Appeal - Other Order,, 766 **Circuit Transcript Order Form**,. (Melton, Laura) (Entered: 01/12/2026)
01/12/2026	770	Corrected Transcript and Notice of Correction of Motions (nonsealed portions) as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira held on 01/17/25 before Judge Aileen M. Cannon, 1-58, 69-86 pages, re: 768 Transcript - Appeal,, 762 Notice of Appeal - Other Order,, Court Reporter: Laura Melton, 772-467-2327 / Laura_Melton@flsd.uscourts.gov. (Melton, Laura) (Entered: 01/12/2026)
01/12/2026		SYSTEM ENTRY - Docket Entry 768 restricted/sealed until further notice. (apz) (Entered: 01/13/2026)
01/13/2026	771	TRANSCRIPT ORDER FORM as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira re 763 Notice of Appeal - Other Order,, filed by American Oversight. No Transcript Requested. (Llanes, Barbara) (Entered: 01/13/2026)
01/20/2026	772	Unopposed MOTION for an Order Prohibiting the Release of Volume II by Donald J. Trump as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira. Responses due by 2/3/2026. (Wharton, Kendra) (Entered: 01/20/2026)
01/23/2026	773	Response *to December 22 2025 Order* by USA as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira to 761 Order (Reboso, Manolo) (Entered: 01/23/2026)
02/09/2026	775	Joint MOTION to Intervene in order to seek a stay re 772 Unopposed MOTION for an Order Prohibiting the Release of Volume II , 774 Joint MOTION for an Order Prohibiting the Release of Volume II re 761 Order *by Waltine Nauta and Carlos De Oliveira on an expedited basis* by Kinght First Amendment Institute at Columbia University, American Oversight as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira. Attorney David Buckner added to party Kinght First Amendment Institute at Columbia University(pty:ip), Attorney David Buckner added to party American Oversight(pty:ip). Responses due by 2/23/2026. (Buckner, David) (Entered: 02/09/2026)

02/11/2026	776	Pursuant to 11th Cir. R. 11-2 and 11th Cir. R. 11-3, the Clerk of the District Court for the Southern District of Florida certifies that the record is complete for purposes of this appeal re: 763 Notice of Appeal - Other Order, 762 Notice of Appeal - Other Order, Appeal No. 25-14507-AA. The record on appeal is available electronically with the exception of: Sealed DE 768 . (apz) (Entered: 02/11/2026)

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Description:	Docket Report	**Search Criteria:**	9:23-cr-80101-AMC
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TAB 3

Case No. 23-cr-80101-AMC, S.D. Fla.,

Doc. 3

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

23-80101-CR-CANNON/REINHART

Case No. _____

18 U.S.C. § 793(e)
18 U.S.C. § 1512(k)
18 U.S.C. § 1512(b)(2)(A)
18 U.S.C. § 1512(c)(1)
18 U.S.C. § 1519
18 U.S.C. § 1001(a)(1)
18 U.S.C. § 1001(a)(2)
18 U.S.C. § 2

UNITED STATES OF AMERICA

v.

DONALD J. TRUMP and
WALTINE NAUTA,

Defendants.
_____/

INDICTMENT

The Grand Jury charges that:

GENERAL ALLEGATIONS

At times material to this Indictment, on or about the dates and approximate times stated below:

Introduction

1. Defendant **DONALD J. TRUMP** was the forty-fifth President of the United States of America. He held office from January 20, 2017, until January 20, 2021. As president, **TRUMP** had lawful access to the most sensitive classified documents and national defense information gathered and owned by the United States government, including information from the agencies that comprise the United States Intelligence Community and the United States Department of Defense.

SCANNED

2. Over the course of his presidency, **TRUMP** gathered newspapers, press clippings, letters, notes, cards, photographs, official documents, and other materials in cardboard boxes that he kept in the White House. Among the materials **TRUMP** stored in his boxes were hundreds of classified documents.

3. The classified documents **TRUMP** stored in his boxes included information regarding defense and weapons capabilities of both the United States and foreign countries; United States nuclear programs; potential vulnerabilities of the United States and its allies to military attack; and plans for possible retaliation in response to a foreign attack. The unauthorized disclosure of these classified documents could put at risk the national security of the United States, foreign relations, the safety of the United States military, and human sources and the continued viability of sensitive intelligence collection methods.

4. At 12:00 p.m. on January 20, 2021, **TRUMP** ceased to be president. As he departed the White House, **TRUMP** caused scores of boxes, many of which contained classified documents, to be transported to The Mar-a-Lago Club in Palm Beach, Florida, where he maintained his residence. **TRUMP** was not authorized to possess or retain those classified documents.

5. The Mar-a-Lago Club was an active social club, which, between January 2021 and August 2022, hosted events for tens of thousands of members and guests. After **TRUMP**'s presidency, The Mar-a-Lago Club was not an authorized location for the storage, possession, review, display, or discussion of classified documents. Nevertheless, **TRUMP** stored his boxes containing classified documents in various locations at The Mar-a-Lago Club—including in a ballroom, a bathroom and shower, an office space, his bedroom, and a storage room.

6. On two occasions in 2021, **TRUMP** showed classified documents to others, as follows:

a. In July 2021, at Trump National Golf Club in Bedminster, New Jersey ("The Bedminster Club"), during an audio-recorded meeting with a writer, a publisher, and two members of his staff, none of whom possessed a security clearance, **TRUMP** showed and described a "plan of attack" that **TRUMP** said was prepared for him by the Department of Defense and a senior military official. **TRUMP** told the individuals that the plan was "highly confidential" and "secret." **TRUMP** also said, "as president I could have declassified it," and, "Now I can't, you know, but this is still a secret."

b. In August or September 2021, at The Bedminster Club, **TRUMP** showed a representative of his political action committee who did not possess a security clearance a classified map related to a military operation and told the representative that he should not be showing it to the representative and that the representative should not get too close.

7. On March 30, 2022, the Federal Bureau of Investigation ("FBI") opened a criminal investigation into the unlawful retention of classified documents at The Mar-a-Lago Club. A federal grand jury investigation began the next month. The grand jury issued a subpoena requiring **TRUMP** to turn over all documents with classification markings. **TRUMP** endeavored to obstruct the FBI and grand jury investigations and conceal his continued retention of classified documents by, among other things:

a. suggesting that his attorney falsely represent to the FBI and grand jury that **TRUMP** did not have documents called for by the grand jury subpoena;

b. directing defendant **WALTINE NAUTA** to move boxes of documents to conceal them from **TRUMP**'s attorney, the FBI, and the grand jury;

c. suggesting that his attorney hide or destroy documents called for by the grand jury subpoena;

d. providing to the FBI and grand jury just some of the documents called for by the grand jury subpoena, while claiming that he was cooperating fully; and

e. causing a certification to be submitted to the FBI and grand jury falsely representing that all documents called for by the grand jury subpoena had been produced—while knowing that, in fact, not all such documents had been produced.

8. As a result of **TRUMP**'s retention of classified documents after his presidency and refusal to return them, hundreds of classified documents were not recovered by the United States government until 2022, as follows:

a. On January 17, nearly one year after **TRUMP** left office, and after months of demands by the National Archives and Records Administration for **TRUMP** to provide all missing presidential records, **TRUMP** provided only 15 boxes, which contained 197 documents with classification markings.

b. On June 3, in response to a grand jury subpoena demanding the production of all documents with classification markings, **TRUMP**'s attorney provided to the FBI 38 more documents with classification markings.

c. On August 8, pursuant to a court-authorized search warrant, the FBI recovered from **TRUMP**'s office and a storage room at The Mar-a-Lago Club 102 more documents with classification markings.

TRUMP's Co-Conspirator

9. Defendant **NAUTA** was a member of the United States Navy stationed as a valet in the White House during **TRUMP**'s presidency. Beginning in August 2021, **NAUTA** became an executive assistant in The Office of Donald J. Trump and served as **TRUMP**'s personal aide or "body man." **NAUTA** reported to **TRUMP**, worked closely with **TRUMP**, and traveled with **TRUMP**.

The Mar-a-Lago Club

10. The Mar-a-Lago Club was located on South Ocean Boulevard in Palm Beach, Florida, and included **TRUMP**'s residence, more than 25 guest rooms, two ballrooms, a spa, a gift store, exercise facilities, office space, and an outdoor pool and patio. As of January 2021, The Mar-a-Lago Club had hundreds of members and was staffed by more than 150 full-time, part-time, and temporary employees.

11. Between January 2021 and August 2022, The Mar-a-Lago Club hosted more than 150 social events, including weddings, movie premieres, and fundraisers that together drew tens of thousands of guests.

12. The United States Secret Service (the "Secret Service") provided protection services to **TRUMP** and his family after he left office, including at The Mar-a-Lago Club, but it was not responsible for the protection of **TRUMP**'s boxes or their contents. **TRUMP** did not inform the Secret Service that he was storing boxes containing classified documents at The Mar-a-Lago Club.

Classified Information

13. National security information was information owned by, produced by, produced for, and under the control of the United States government. Pursuant to Executive Order 12958, signed on April 17, 1995, as amended by Executive Order 13292 on March 25, 2003, and Executive Order 13526 on December 29, 2009, national security information was classified as "TOP SECRET," "SECRET," or "CONFIDENTIAL," as follows:

a. Information was classified as TOP SECRET if the unauthorized disclosure of that information reasonably could be expected to cause exceptionally grave damage to the national security that the original classification authority was able to identify or describe.

b. Information was classified as SECRET if the unauthorized disclosure of that information reasonably could be expected to cause serious damage to the national security that the original classification authority was able to identify or describe.

c. Information was classified as CONFIDENTIAL if the unauthorized disclosure of that information reasonably could be expected to cause damage to the national security that the original classification authority was able to identify or describe.

14. The classification marking "NOFORN" stood for "Not Releasable to Foreign Nationals" and denoted that dissemination of that information was limited to United States persons.

15. Classified information related to intelligence sources, methods, and analytical processes was designated as Sensitive Compartmented Information ("SCI"). SCI was to be processed, stored, used, or discussed in an accredited Sensitive Compartmented Information Facility ("SCIF"), and only individuals with the appropriate security clearance and additional SCI permissions were authorized to have access to such national security information.

16. When the vulnerability of, or threat to, specific classified information was exceptional, and the normal criteria for determining eligibility for access to classified information were insufficient to protect the information from unauthorized disclosure, the United States could establish Special Access Programs ("SAPs") to further protect the classified information. The number of these programs was to be kept to an absolute minimum and limited to programs in which the number of persons who ordinarily would have access would be reasonably small and commensurate with the objective of providing enhanced protection for the information involved. Only individuals with the appropriate security clearance and additional SAP permissions were authorized to have access to such national security information, which was subject to enhanced handling and storage requirements.

17. Pursuant to Executive Order 13526, information classified at any level could be lawfully accessed only by persons determined by an appropriate United States government official to be eligible for access to classified information and who had signed an approved non-disclosure agreement, who received a security clearance, and who had a "need-to-know" the classified

information. After his presidency, **TRUMP** was not authorized to possess or retain classified documents.

18. Executive Order 13526 provided that a former president could obtain a waiver of the "need-to-know" requirement, if the agency head or senior agency official of the agency that originated the classified information: (1) determined in writing that access was consistent with the interest of national security and (2) took appropriate steps to protect classified information from unauthorized disclosure or compromise and ensured that the information was safeguarded in a manner consistent with the order. **TRUMP** did not obtain any such waiver after his presidency.

The Executive Branch Departments and Agencies Whose Classified Documents TRUMP Retained After His Presidency

19. As part of his official duties as president, **TRUMP** received intelligence briefings from high-level United States government officials, including briefings from the Director of the Central Intelligence Agency, the Chairman of the Joint Chiefs of Staff, senior White House officials, and a designated briefer. He regularly received a collection of classified intelligence from the United States Intelligence Community ("USIC") known as the "President's Daily Brief."

20. The USIC's mission was to collect, analyze, and deliver foreign intelligence and counterintelligence information to America's leaders, including the president, policymakers, law enforcement, and the military, so they could make sound decisions to protect the United States. The USIC consisted of United States executive branch departments and agencies responsible for the conduct of foreign relations and the protection of national security.

21. After his presidency, **TRUMP** retained classified documents originated by, or implicating the equities of, multiple USIC members and other executive branch departments and agencies, including the following:

a. **The Central Intelligence Agency ("CIA").** CIA was responsible for providing intelligence on foreign countries and global issues to the president and other policymakers to help them make national security decisions.

b. **The Department of Defense ("DoD").** DoD was responsible for providing the military forces needed to deter war and ensure national security. Some of the executive branch agencies comprising the USIC were within DoD.

c. **The National Security Agency.** The National Security Agency was a combat support agency within DoD and a member of the USIC responsible for foreign signals intelligence and cybersecurity. This included collecting, processing, and disseminating to United States policymakers and military leaders foreign intelligence derived from communications and information systems; protecting national security systems; and enabling computer network operations.

d. **The National Geospatial Intelligence Agency.** The National Geospatial Intelligence Agency was a combat support agency within DoD responsible for the exploitation and analysis of imagery, imagery intelligence, and geospatial information in support of the national security objectives of the United States and the geospatial intelligence requirements of DoD, the Department of State, and other federal agencies.

e. **The National Reconnaissance Office.** The National Reconnaissance Office was an agency within DoD responsible for developing, acquiring, launching, and operating space-based surveillance and reconnaissance systems that collected and delivered intelligence to enhance national security.

f. **The Department of Energy.** The Department of Energy was responsible for maintaining a safe, secure, and effective nuclear deterrent to protect national security, including ensuring the effectiveness of the United States nuclear weapons stockpile without nuclear explosive testing.

g. **The Department of State and Bureau of Intelligence and Research.** The Department of State was responsible for protecting and promoting United States security, prosperity, and democratic values. Within the Department of State, the Bureau of Intelligence and Research was a member of the USIC and responsible for providing intelligence to inform diplomacy and support United States diplomats.

TRUMP's Public Statements on Classified Information

22. As a candidate for President of the United States, **TRUMP** made the following public statements, among others, about classified information:

a. On August 18, 2016, **TRUMP** stated, "In my administration I'm going to enforce all laws concerning the protection of classified information. No one will be above the law."

b. On September 6, 2016, **TRUMP** stated, "We also need to fight this battle by collecting intelligence and then protecting, protecting our classified secrets. . . . We can't have someone in the Oval Office who doesn't understand the meaning of the word confidential or classified."

c. On September 7, 2016, **TRUMP** stated, "[O]ne of the first things we must do is to enforce all classification rules and to enforce all laws relating to the handling of classified information."

d. On September 19, 2016, **TRUMP** stated, "We also need the best protection of classified information."

e. On November 3, 2016, **TRUMP** stated, "Service members here in North Carolina have risked their lives to acquire classified intelligence to protect our country."

23. As President of the United States, on July 26, 2018, **TRUMP** issued the following statement about classified information:

> As the head of the executive branch and Commander in Chief, I have a unique, Constitutional responsibility to protect the Nation's classified information, including by controlling access to it. . . . More broadly, the issue of [a former executive branch official's] security clearance raises larger questions about the practice of former officials maintaining access to our Nation's most sensitive secrets long after their time in Government has ended. Such access is particularly inappropriate when former officials have transitioned into highly partisan positions and seek to use real or perceived access to sensitive information to validate their political attacks. Any access granted to our Nation's secrets should be in furtherance of national, not personal, interests.

TRUMP's Retention of Classified Documents After His Presidency

24. In January 2021, as he was preparing to leave the White House, **TRUMP** and his White House staff, including **NAUTA**, packed items, including some of **TRUMP**'s boxes. **TRUMP** was personally involved in this process. **TRUMP** caused his boxes, containing hundreds of classified documents, to be transported from the White House to The Mar-a-Lago Club.

25. From January through March 15, 2021, some of **TRUMP**'s boxes were stored in The Mar-a-Lago Club's White and Gold Ballroom, in which events and gatherings took place. **TRUMP**'s boxes were for a time stacked on the ballroom's stage, as depicted in the photograph below (redacted to obscure an individual's identity).



26. In March 2021, **NAUTA** and others moved some of **TRUMP**'s boxes from the White and Gold Ballroom to the business center at The Mar-a-Lago Club.

27. On April 5, 2021, an employee of The Office of Donald J. Trump ("Trump Employee 1") texted another employee of that office ("Trump Employee 2") to ask whether **TRUMP**'s boxes could be moved out of the business center to make room for staff to use it as an office. Trump Employee 2 replied, "Woah!! Ok so potus specifically asked Walt for those boxes to be in the business center because they are his 'papers.'" Later that day, Trump Employee 1 and Trump Employee 2 exchanged the following text messages:

Trump Employee 2:

> We can definitely make it work if we move his papers into the lake room?

Trump Employee 1:

> There is still a little room in the shower where his other stuff is. Is it only his papers he cares about? Theres some other stuff in there that are not papers. Could that go to storage? Or does he want everything in there on property

Trump Employee 2:

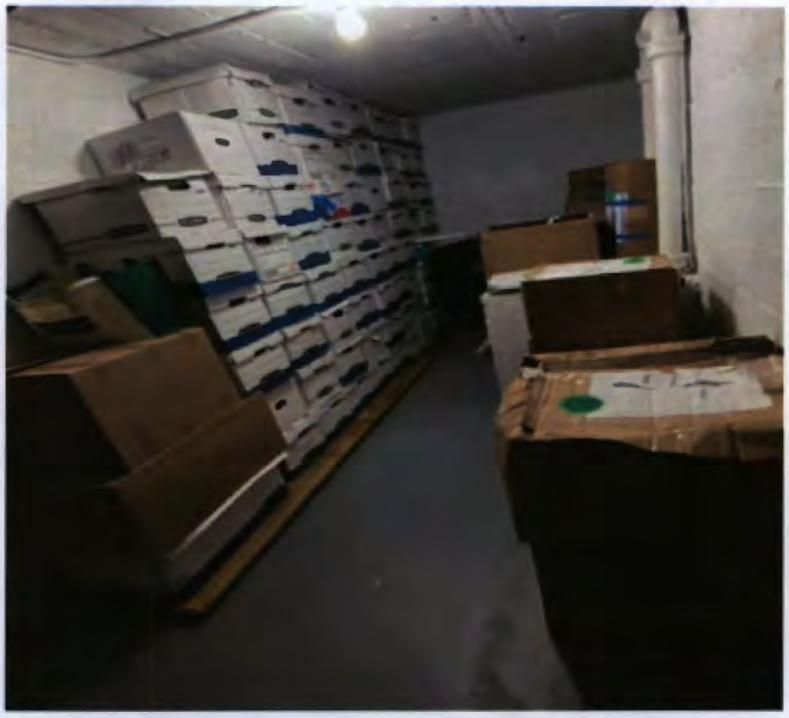
> Yes - anything that's not the beautiful mind paper boxes can definitely go to storage. Want to take a look at the space and start moving tomorrow AM?

28. After the text exchange between Trump Employee 1 and Trump Employee 2, in April 2021, some of **TRUMP**'s boxes were moved from the business center to a bathroom and shower in The Mar-a-Lago Club's Lake Room, as depicted in the photograph below.



29. In May 2021, **TRUMP** directed that a storage room on the ground floor of The Mar-a-Lago Club (the "Storage Room") be cleaned out so that it could be used to store his boxes. The hallway leading to the Storage Room could be reached from multiple outside entrances, including one accessible from The Mar-a-Lago Club pool patio through a doorway that was often kept open. The Storage Room was near the liquor supply closet, linen room, lock shop, and various other rooms.

30. On June 24, 2021, **TRUMP**'s boxes that were in the Lake Room were moved to the Storage Room. After the move, there were more than 80 boxes in the Storage Room, as depicted in the photographs below.





31. On December 7, 2021, **NAUTA** found several of **TRUMP**'s boxes fallen and their contents spilled onto the floor of the Storage Room, including a document marked "SECRET//REL

TO USA, FVEY," which denoted that the information in the document was releasable only to the Five Eyes intelligence alliance consisting of Australia, Canada, New Zealand, the United Kingdom, and the United States. **NAUTA** texted Trump Employee 2, "I opened the door and found this..." **NAUTA** also attached two photographs he took of the spill. Trump Employee 2 replied, "Oh no oh no," and "I'm sorry potus had my phone." One of the photographs **NAUTA** texted to Trump Employee 2 is depicted below with the visible classified information redacted. **TRUMP**'s unlawful retention of this document is charged in Count 8 of this Indictment.



TRUMP's Disclosures of Classified Information in Private Meetings

32. In May 2021, **TRUMP** caused some of his boxes to be brought to his summer residence at The Bedminster Club. Like The Mar-a-Lago Club, after **TRUMP**'s presidency, The Bedminster Club was not an authorized location for the storage, possession, review, display, or discussion of classified documents.

33. On July 21, 2021, when he was no longer president, **TRUMP** gave an interview in his office at The Bedminster Club to a writer and a publisher in connection with a then-forthcoming book. Two members of **TRUMP**'s staff also attended the interview, which was recorded with **TRUMP**'s knowledge and consent. Before the interview, the media had published reports that, at the end of **TRUMP**'s term as president, a senior military official (the "Senior Military Official") purportedly feared that **TRUMP** might order an attack on Country A and that the Senior Military Official advised **TRUMP** against doing so.

34. Upon greeting the writer, publisher, and his two staff members, **TRUMP** stated, "Look what I found, this was [the Senior Military Official's] plan of attack, read it and just show . . . it's interesting." Later in the interview, **TRUMP** engaged in the following exchange:

TRUMP: Well, with [the Senior Military Official]—uh, let me see that, I'll show you an example. He said that I wanted to attack [Country A]. Isn't it amazing? I have a big pile of papers, this thing just came up. Look. This was him. They presented me this—this is off the record, but—they presented me this. This was him. This was the Defense Department and him.

WRITER: Wow.

TRUMP: We looked at some. This was him. This wasn't done by me, this was him. All sorts of stuff—pages long, look.

STAFFER: Mm.

TRUMP: Wait a minute, let's see here.

STAFFER: *[Laughter]* Yeah.

TRUMP: I just found, isn't that amazing? This totally wins my case, you know.

STAFFER: Mm-hm.

TRUMP: Except it is like, highly confidential.

STAFFER: Yeah. *[Laughter]*

TRUMP: Secret. This is secret information. Look, look at this. You attack, and—

* * *

TRUMP: By the way. Isn't that incredible?

STAFFER: Yeah.

TRUMP: I was just thinking, because we were talking about it. And you know, he said, "he wanted to attack [Country A], and what . . ."

STAFFER: You did.

TRUMP: This was done by the military and given to me. Uh, I think we can probably, right?

STAFFER: I don't know, we'll, we'll have to see. Yeah, we'll have to try to—

TRUMP: Declassify it.

STAFFER: —figure out a—yeah.

TRUMP: See as president I could have declassified it.

STAFFER: Yeah. *[Laughter]*

TRUMP: Now I can't, you know, but this is still a secret.

STAFFER: Yeah. *[Laughter]* Now we have a problem.

TRUMP: Isn't that interesting?

At the time of this exchange, the writer, the publisher, and **TRUMP**'s two staff members did not have security clearances or any need-to-know any classified information about a plan of attack on Country A.

35. In August or September 2021, when he was no longer president, **TRUMP** met in his office at The Bedminster Club with a representative of his political action committee (the "PAC

Representative"). During the meeting, **TRUMP** commented that an ongoing military operation in Country B was not going well. **TRUMP** showed the PAC Representative a classified map of Country B and told the PAC Representative that he should not be showing the map to the PAC Representative and to not get too close. The PAC Representative did not have a security clearance or any need-to-know classified information about the military operation.

36. On February 16, 2017, four years before **TRUMP**'s disclosures of classified information set forth above, **TRUMP** said at a press conference:

> The first thing I thought of when I heard about it is, how does the press get this information that's classified? How do they do it? You know why? Because it's an illegal process, and the press should be ashamed of themselves. But more importantly, the people that gave out the information to the press should be ashamed of themselves. Really ashamed.

TRUMP's Production of 15 Cardboard Boxes to the National Archives and Records Administration

37. Beginning in May 2021, the National Archives and Records Administration ("NARA"), which was responsible for archiving presidential records, repeatedly demanded that **TRUMP** turn over presidential records that he had kept after his presidency. On multiple occasions, beginning in June, NARA warned **TRUMP** through his representatives that if he did not comply, it would refer the matter of the missing records to the Department of Justice.

38. Between November 2021 and January 2022, **NAUTA** and Trump Employee 2—at **TRUMP**'s direction—brought boxes from the Storage Room to **TRUMP**'s residence for **TRUMP** to review.

39. On November 12, 2021, Trump Employee 2 provided **TRUMP** a photograph of his boxes in the Storage Room by taping it to one of the boxes that Trump Employee 2 had placed in **TRUMP**'s residence. Trump Employee 2 provided **TRUMP** the photograph so that **TRUMP**

could see how many of his boxes were stored in the Storage Room. The photograph, shown below, depicted a wall of the Storage Room against which dozens of **TRUMP**'s boxes were stacked.



40. On November 17, 2021, **NAUTA** texted Trump Employee 2 about the photograph Trump Employee 2 had provided to **TRUMP**, stating, "He mentioned about a picture of the 'boxes' he wants me to see it?" Trump Employee 2 replied, "Calling you shortly."

41. On November 25, 2021, Trump Employee 2 texted **NAUTA** about **TRUMP**'s review of the contents of his boxes, asking, "Has he mentioned boxes to you? I delivered some, but I think he may need more. Could you ask if he'd like more in pine hall?" Pine Hall was an entry room in **TRUMP**'s residence. **NAUTA** replied in three successive text messages:

Nothing about boxes yet

He has one he's working on in pine hall

Knocked out 2 boxes yesterday

42. On November 29, 2021, Trump Employee 2 texted **NAUTA**, asking, "Next you are on property (no rush) could you help me bring 4 more boxes up?" **NAUTA** replied, "Yes!! Of course."

43. On December 29, 2021, Trump Employee 2 texted a **TRUMP** representative who was in contact with NARA ("Trump Representative 1"), "box answer will be wrenched out of him today, promise!" The next day, Trump Representative 1 replied in two successive text messages:

> Hey - Just checking on Boxes…
>
> would love to have a number to them today

Trump Employee 2 spoke to **TRUMP** and then responded a few hours later in two successive text messages:

> 12
>
> Is his number

44. On January 13, 2022, **NAUTA** texted Trump Employee 2 about **TRUMP**'s "tracking" of boxes, stating, "He's tracking the boxes, more to follow today on whether he wants to go through more today or tomorrow." Trump Employee 2 replied, "Thank you!"

45. On January 15, 2022, **NAUTA** sent Trump Employee 2 four successive text messages:

> One thing he asked
>
> Was for new covers for the boxes, for Monday m.
>
> Morning
>
> *can we get new box covers before giving these to them on Monday? They have too much writing on them..I marked too much

Trump Employee 2 replied, "Yes, I will get that!"

46. On January 17, 2022, Trump Employee 2 and **NAUTA** gathered 15 boxes from **TRUMP**'s residence, loaded the boxes in **NAUTA**'s car, and took them to a commercial truck for delivery to NARA.

47. When interviewed by the FBI in May 2022 regarding the location and movement of boxes before the production to NARA, **NAUTA** made false and misleading statements as set forth in Count 38 of this Indictment, including:

a. falsely stating that he was not aware of **TRUMP**'s boxes being brought to **TRUMP**'s residence for his review before **TRUMP** provided 15 boxes to NARA in January 2022;

b. falsely stating that he did not know how the boxes that he and Trump Employee 2 brought from **TRUMP**'s residence to the commercial truck for delivery to NARA on January 17, 2022, had gotten to the residence; and

c. when asked whether he knew where **TRUMP**'s boxes had been stored before they were in **TRUMP**'s residence and whether they had been in a secure or locked location, **NAUTA** falsely responded, "I wish, I wish I could tell you. I don't know. I don't—I honestly just don't know."

48. When the 15 boxes that **TRUMP** had provided reached NARA in January 2022, NARA reviewed the contents and determined that 14 of the boxes contained documents with classification markings. Specifically, as the FBI later determined, the boxes contained 197 documents with classification markings, of which 98 were marked "SECRET," 30 were marked "TOP SECRET," and the remainder were marked "CONFIDENTIAL." Some of those documents also contained SCI and SAP markings.

49. On February 9, 2022, NARA referred the discovery of classified documents in **TRUMP**'s boxes to the Department of Justice for investigation.

The FBI and Grand Jury Investigations

50. On March 30, 2022, the FBI opened a criminal investigation.

51. On April 26, 2022, a federal grand jury opened an investigation.

The Defendants' Concealment of Boxes

52. On May 11, 2022, the grand jury issued a subpoena (the "May 11 Subpoena") to The Office of Donald J. Trump requiring the production of all documents with classification markings in the possession, custody, or control of **TRUMP** or The Office of Donald J. Trump. Two attorneys representing **TRUMP** ("Trump Attorney 1" and "Trump Attorney 2") informed **TRUMP** of the May 11 Subpoena, and he authorized Trump Attorney 1 to accept service.

53. On May 22, 2022, **NAUTA** entered the Storage Room at 3:47 p.m. and left approximately 34 minutes later, carrying one of **TRUMP**'s boxes.

54. On May 23, 2022, **TRUMP** met with Trump Attorney 1 and Trump Attorney 2 at The Mar-a-Lago Club to discuss the response to the May 11 Subpoena. Trump Attorney 1 and Trump Attorney 2 told **TRUMP** that they needed to search for documents that would be responsive to the subpoena and provide a certification that there had been compliance with the subpoena. **TRUMP**, in sum and substance, made the following statements, among others, as memorialized by Trump Attorney 1:

a. I don't want anybody looking, I don't want anybody looking through my boxes, I really don't, I don't want you looking through my boxes.

b. Well what if we, what happens if we just don't respond at all or don't play ball with them?

c. Wouldn't it be better if we just told them we don't have anything here?

d. Well look isn't it better if there are no documents?

55. While meeting with Trump Attorney 1 and Trump Attorney 2 on May 23, **TRUMP**, in sum and substance, told the following story, as memorialized by Trump Attorney 1:

> [Attorney], he was great, he did a great job. You know what? He said, he said that it – that it was him. That he was the one who deleted all of her emails, the 30,000 emails, because they basically dealt with her scheduling and her going to the gym and her having

> beauty appointments. And he was great. And he, so she didn't get in any trouble because he said that he was the one who deleted them.

TRUMP related the story more than once that day.

56. On May 23, **TRUMP** also confirmed his understanding with Trump Attorney 1 that Trump Attorney 1 would return to The Mar-a-Lago Club on June 2 to search for any documents with classification markings to produce in response to the May 11 Subpoena. Trump Attorney 1 made it clear to **TRUMP** that Trump Attorney 1 would conduct the search for responsive documents by looking through **TRUMP**'s boxes that had been transported from the White House and remained in storage at The Mar-a-Lago Club. **TRUMP** indicated that he wanted to be at The Mar-a-Lago Club when Trump Attorney 1 returned to review his boxes on June 2, and that **TRUMP** would change his summer travel plans to do so. **TRUMP** told Trump Attorney 2 that Trump Attorney 2 did not need to be present for the review of boxes.

57. After meeting with Trump Attorney 1 and Trump Attorney 2 on May 23, **TRUMP** delayed his departure from The Mar-a-Lago Club to The Bedminster Club for the summer so that he would be present at The Mar-a-Lago Club on June 2, when Trump Attorney 1 returned to review the boxes.

58. Between **TRUMP**'s May 23 meeting with Trump Attorney 1 and Trump Attorney 2 to discuss the May 11 Subpoena, and June 2, when Trump Attorney 1 returned to The Mar-a-Lago Club to review the boxes in the Storage Room, **NAUTA** removed—at **TRUMP**'s direction—a total of approximately 64 boxes from the Storage Room and brought them to **TRUMP**'s residence, as set forth below:

a. On May 24, 2022, between 5:30 p.m. and 5:38 p.m., **NAUTA** removed three boxes from the Storage Room.

b. On May 30, 2022, at 9:08 a.m., **TRUMP** and **NAUTA** spoke by phone for approximately 30 seconds. Between 10:02 a.m. and 11:51 a.m., **NAUTA** removed a total of approximately 50 boxes from the Storage Room.

c. On May 30, 2022, at 12:33 p.m., a Trump family member texted **NAUTA**:

> Good afternoon Walt,
> Happy Memorial Day!
>
> I saw you put boxes to Potus room. Just FYI and I will tell him as well:
> Not sure how many he wants to take on Friday on the plane. We will NOT have a room for them. Plane will be full with luggage.
> Thank you!

NAUTA replied:

> Good Afternoon Ma'am [Smiley Face Emoji]
> Thank you so much.
>
> I think he wanted to pick from them. I don't imagine him wanting to take the boxes.
>
> He told me to put them in the room and that he was going to talk to you about them.

d. On June 1, 2022, beginning at 12:52 p.m., **NAUTA** removed approximately 11 boxes from the Storage Room.

59. On June 1, 2022, **TRUMP** spoke with Trump Attorney 1 by phone and asked whether Trump Attorney 1 was coming to The Mar-a-Lago Club the next day and for exactly what purpose. Trump Attorney 1 reminded **TRUMP** that Trump Attorney 1 was going to review the boxes that had been transported from the White House and remained in storage at The Mar-a-Lago Club so that Trump Attorney 1 could have a custodian of records certify that the May 11 subpoena had been complied with fully.

60. On June 2, 2022, the day that Trump Attorney 1 was scheduled to review **TRUMP**'s boxes in the Storage Room, **TRUMP** spoke with **NAUTA** on the phone at 9:29 a.m. for approximately 24 seconds.

61. Later that day, between 12:33 p.m. and 12:52 p.m., **NAUTA** and an employee of The Mar-a-Lago Club moved approximately 30 boxes from **TRUMP**'s residence to the Storage Room.

62. In sum, between May 23, 2022, and June 2, 2022, before Trump Attorney 1's review of **TRUMP**'s boxes in the Storage Room, **NAUTA**—at **TRUMP**'s direction—moved approximately 64 boxes from the Storage Room to **TRUMP**'s residence and brought to the Storage Room only approximately 30 boxes. Neither **TRUMP** nor **NAUTA** informed Trump Attorney 1 of this information.

The False Certification to the FBI and the Grand Jury

63. On the afternoon of June 2, 2022, as **TRUMP** had been informed, Trump Attorney 1 arrived at The Mar-a-Lago Club to review **TRUMP**'s boxes to look for documents with classification markings in response to the May 11 Subpoena. **TRUMP** met with Trump Attorney 1 before Trump Attorney 1 conducted the review. **NAUTA** escorted Trump Attorney 1 to the Storage Room.

64. Between 3:53 p.m. and 6:23 p.m., Trump Attorney 1 reviewed the contents of **TRUMP**'s boxes in the Storage Room. Trump Attorney 1 located 38 documents with classification markings inside the boxes, which Trump Attorney 1 removed and placed in a Redweld folder. Trump Attorney 1 contacted **NAUTA** and asked him to bring clear duct tape to the Storage Room, which **NAUTA** did. Trump Attorney 1 used the clear duct tape to seal the Redweld folder with the documents with classification markings inside.

65. After Trump Attorney 1 finished sealing the Redweld folder containing the documents with classification markings that he had found inside **TRUMP**'s boxes, **NAUTA** took Trump Attorney 1 to a dining room in The Mar-a-Lago Club to meet with **TRUMP**. After Trump Attorney 1 confirmed that he was finished with his search of the Storage Room, **TRUMP** asked, "Did you find anything? . . . Is it bad? Good?"

66. **TRUMP** and Trump Attorney 1 then discussed what to do with the Redweld folder containing documents with classification markings and whether Trump Attorney 1 should bring them to his hotel room and put them in a safe there. During that conversation, **TRUMP** made a plucking motion, as memorialized by Trump Attorney 1:

> He made a funny motion as though – well okay why don't you take them with you to your hotel room and if there's anything really bad in there, like, you know, pluck it out. And that was the motion that he made. He didn't say that.

67. That evening, Trump Attorney 1 contacted the Department of Justice and requested that an FBI agent meet him at The Mar-a-Lago Club the next day, June 3, so that he could turn over the documents responsive to the May 11 Subpoena.

68. Also that evening, Trump Attorney 1 contacted another **TRUMP** attorney ("Trump Attorney 3") and asked her if she would come to The Mar-a-Lago Club the next morning to act as a custodian of records and sign a certification regarding the search for documents with classification markings in response to the May 11 Subpoena. Trump Attorney 3, who had no role in the review of **TRUMP**'s boxes in the Storage Room, agreed.

69. The next day, on June 3, 2022, at Trump Attorney 1's request, Trump Attorney 3 signed a certification as the custodian of records for The Office of Donald J. Trump and took it to The Mar-a-Lago Club to provide it to the Department of Justice and FBI. In the certification, Trump Attorney 3—who performed no search of **TRUMP**'s boxes, had not reviewed the May 11

Subpoena, and had not reviewed the contents of the Redweld folder—stated, among other things, that "[b]ased upon the information that [had] been provided to" her:

a. "A diligent search was conducted of the boxes that were moved from the White House to Florida";

b. "This search was conducted after receipt of the subpoena, in order to locate any and all documents that are responsive to the subpoena"; and

c. "Any and all responsive documents accompany this certification."

70. These statements were false because, among other reasons, **TRUMP** had directed **NAUTA** to move boxes before Trump Attorney 1's June 2 review, so that many boxes were not searched and many documents responsive to the May 11 Subpoena could not be found—and in fact were not found—by Trump Attorney 1.

71. Shortly after Trump Attorney 3 executed the false certification, on June 3, 2022, Trump Attorney 1 and Trump Attorney 3 met at The Mar-a-Lago Club with personnel from the Department of Justice and FBI. Trump Attorney 1 and Trump Attorney 3 turned over the Redweld folder containing documents with classification markings, as well as the false certification signed by Trump Attorney 3 as custodian of records. **TRUMP**, who had delayed his departure from The Mar-a-Lago Club, joined Trump Attorney 1 and Trump Attorney 3 for some of the meeting. **TRUMP** claimed to the Department of Justice and FBI that he was "an open book."

72. Earlier that same day, **NAUTA** and others loaded several of **TRUMP**'s boxes along with other items on aircraft that flew **TRUMP** and his family north for the summer.

The Court-Authorized Search of The Mar-a-Lago Club

73. In July 2022, the FBI and grand jury obtained and reviewed surveillance video from The Mar-a-Lago Club showing the movement of boxes set forth above.

74. On August 8, 2022, the FBI executed a court-authorized search warrant at The Mar-a-Lago Club. The search warrant authorized the FBI to search for and seize, among other things, all documents with classification markings.

75. During the execution of the warrant at The Mar-a-Lago Club, the FBI seized 102 documents with classification markings in **TRUMP**'s office and the Storage Room, as follows:

Location	Number of Documents	Classification Markings
TRUMP's Office	27	Top Secret (6) Secret (18) Confidential (3)
Storage Room	75	Top Secret (11) Secret (36) Confidential (28)

COUNTS 1-31
Willful Retention of National Defense Information
(18 U.S.C. § 793(e))

76. The General Allegations of this Indictment are re-alleged and fully incorporated here by reference.

77. On or about the dates set forth in the table below, in Palm Beach County, in the Southern District of Florida, and elsewhere, the defendant,

DONALD J. TRUMP,

having unauthorized possession of, access to, and control over documents relating to the national defense, did willfully retain the documents and fail to deliver them to the officer and employee of the United States entitled to receive them; that is—**TRUMP**, without authorization, retained at The Mar-a-Lago Club documents relating to the national defense, including the following:

Count	Date of Offense / Classification Marking / Document Description
1	January 20, 2021 – August 8, 2022
	TOP SECRET//NOFORN//SPECIAL HANDLING
	Document dated May 3, 2018, concerning White House intelligence briefing related to various foreign countries
2	January 20, 2021 – August 8, 2022
	TOP SECRET//SI//NOFORN//SPECIAL HANDLING
	Document dated May 9, 2018, concerning White House intelligence briefing related to various foreign countries
3	January 20, 2021 – August 8, 2022
	TOP SECRET//SI//NOFORN//FISA
	Undated document concerning military capabilities of a foreign country and the United States, with handwritten annotation in black marker

4	January 20, 2021 – August 8, 2022
	TOP SECRET//SPECIAL HANDLING
	Document dated May 6, 2019, concerning White House intelligence briefing related to foreign countries, including military activities and planning of foreign countries
5	January 20, 2021 – August 8, 2022
	TOP SECRET//[redacted]/[redacted]//ORCON/NOFORN
	Document dated June 2020 concerning nuclear capabilities of a foreign country
6	January 20, 2021 – August 8, 2022
	TOP SECRET//SPECIAL HANDLING
	Document dated June 4, 2020, concerning White House intelligence briefing related to various foreign countries
7	January 20, 2021 – August 8, 2022
	SECRET//NOFORN
	Document dated October 21, 2018, concerning communications with a leader of a foreign country
8	January 20, 2021 – August 8, 2022
	SECRET//REL TO USA, FVEY
	Document dated October 4, 2019, concerning military capabilities of a foreign country
9	January 20, 2021 – August 8, 2022
	TOP SECRET//[redacted]/[redacted]//ORCON/NOFORN/FISA
	Undated document concerning military attacks by a foreign country

10	January 20, 2021 – August 8, 2022
	TOP SECRET//TK//NOFORN
	Document dated November 2017 concerning military capabilities of a foreign country
11	January 20, 2021 – August 8, 2022
	No marking
	Undated document concerning military contingency planning of the United States
12	January 20, 2021 – August 8, 2022
	SECRET//REL TO USA, FVEY
	Pages of undated document concerning projected regional military capabilities of a foreign country and the United States
13	January 20, 2021 – August 8, 2022
	TOP SECRET//SI/TK//NOFORN
	Undated document concerning military capabilities of a foreign country and the United States
14	January 20, 2021 – August 8, 2022
	SECRET//ORCON/NOFORN
	Document dated January 2020 concerning military options of a foreign country and potential effects on United States interests
15	January 20, 2021 – August 8, 2022
	SECRET//ORCON/NOFORN
	Document dated February 2020 concerning policies in a foreign country

16	January 20, 2021 – August 8, 2022
	SECRET//ORCON/NOFORN
	Document dated December 2019 concerning foreign country support of terrorist acts against United States interests
17	January 20, 2021 – August 8, 2022
	TOP SECRET//[redacted]/TK//ORCON/IMCON/NOFORN
	Document dated January 2020 concerning military capabilities of a foreign country
18	January 20, 2021 – August 8, 2022
	SECRET//NOFORN
	Document dated March 2020 concerning military operations against United States forces and others
19	January 20, 2021 – August 8, 2022
	SECRET//FORMERLY RESTRICTED DATA
	Undated document concerning nuclear weaponry of the United States
20	January 20, 2021 – August 8, 2022
	TOP SECRET//[redacted]//ORCON/NOFORN
	Undated document concerning timeline and details of attack in a foreign country
21	January 20, 2021 – August 8, 2022
	SECRET//NOFORN
	Undated document concerning military capabilities of foreign countries
22	January 20, 2021 – June 3, 2022
	TOP SECRET//[redacted]//RSEN/ORCON/NOFORN
	Document dated August 2019 concerning regional military activity of a foreign country

23	January 20, 2021 – June 3, 2022
	TOP SECRET//SPECIAL HANDLING
	Document dated August 30, 2019, concerning White House intelligence briefing related to various foreign countries, with handwritten annotation in black marker
24	January 20, 2021 – June 3, 2022
	TOP SECRET//HCS-P/SI//ORCON-USGOV/NOFORN
	Undated document concerning military activity of a foreign country
25	January 20, 2021 – June 3, 2022
	TOP SECRET//HCS-P/SI//ORCON-USGOV/NOFORN
	Document dated October 24, 2019, concerning military activity of foreign countries and the United States
26	January 20, 2021 – June 3, 2022
	TOP SECRET//[redacted]//ORCON/NOFORN/FISA
	Document dated November 7, 2019, concerning military activity of foreign countries and the United States
27	January 20, 2021 – June 3, 2022
	TOP SECRET//SI/TK//NOFORN
	Document dated November 2019 concerning military activity of foreign countries
28	January 20, 2021 – June 3, 2022
	TOP SECRET//SPECIAL HANDLING
	Document dated October 18, 2019, concerning White House intelligence briefing related to various foreign countries

29	January 20, 2021 – June 3, 2022
	TOP SECRET//[redacted]/SI/TK//ORCON/NOFORN
	Document dated October 18, 2019, concerning military capabilities of a foreign country
30	January 20, 2021 – June 3, 2022
	TOP SECRET//[redacted]//ORCON/NOFORN/FISA
	Document dated October 15, 2019, concerning military activity in a foreign country
31	January 20, 2021 – June 3, 2022
	TOP SECRET//SI/TK//NOFORN
	Document dated February 2017 concerning military activity of a foreign country

All in violation of Title 18, United States Code, Section 793(e).

COUNT 32
Conspiracy to Obstruct Justice
(18 U.S.C. § 1512(k))

78. The General Allegations of this Indictment are re-alleged and fully incorporated here by reference.

The Conspiracy and its Objects

79. From on or about May 11, 2022, through in or around August 2022, in Palm Beach County, in the Southern District of Florida, and elsewhere, the defendants,

DONALD J. TRUMP and
WALTINE NAUTA,

did knowingly combine, conspire, confederate, and agree with each other and with others known and unknown to the grand jury, to engage in misleading conduct toward another person and corruptly persuade another person to withhold a record, document, and other object from an official proceeding, in violation of 18 U.S.C. § 1512(b)(2)(A), and to corruptly conceal a record, document, and other object from an official proceeding, in violation of 18 U.S.C. § 1512(c)(1).

The Purpose of the Conspiracy

80. The purpose of the conspiracy was for **TRUMP** to keep classified documents he had taken with him from the White House and to hide and conceal them from a federal grand jury.

The Manner and Means of the Conspiracy

81. The manner and means by which the defendants sought to accomplish the objects and purpose of the conspiracy included, among other things, the following:

a. Suggesting that Trump Attorney 1 falsely represent to the FBI and grand jury that **TRUMP** did not have documents called for by the May 11 Subpoena;

b. moving boxes of documents to conceal them from Trump Attorney 1, the FBI, and the grand jury;

c. suggesting that Trump Attorney 1 hide or destroy documents called for by the May 11 Subpoena;

d. providing to the FBI and grand jury just some of the documents called for by the May 11 Subpoena, while **TRUMP** claimed he was cooperating fully;

e. causing a false certification to be submitted to the FBI and grand jury representing that all documents with classification markings had been produced, when in fact they had not; and

f. making false and misleading statements to the FBI.

All in violation of Title 18, United States Code, Section 1512(k).

COUNT 33
Withholding a Document or Record
(18 U.S.C. §§ 1512(b)(2)(A), 2)

82. The General Allegations of this Indictment are re-alleged and fully incorporated here by reference.

83. From on or about May 11, 2022, through in or around August 2022, in Palm Beach County, in the Southern District of Florida, and elsewhere, the defendants,

DONALD J. TRUMP and
WALTINE NAUTA,

did knowingly engage in misleading conduct toward another person, and knowingly corruptly persuade and attempt to persuade another person, with intent to cause and induce any person to withhold a record, document, and other object from an official proceeding; that is—(1) **TRUMP** attempted to persuade Trump Attorney 1 to hide and conceal documents from a federal grand jury; and (2) **TRUMP** and **NAUTA** misled Trump Attorney 1 by moving boxes that contained documents with classification markings so that Trump Attorney 1 would not find the documents and produce them to a federal grand jury.

All in violation of Title 18, United States Code, Sections 1512(b)(2)(A) and 2.

COUNT 34
Corruptly Concealing a Document or Record
(18 U.S.C. §§ 1512(c)(1), 2)

84. The General Allegations of this Indictment are re-alleged and fully incorporated here by reference.

85. From on or about May 11, 2022, through in or around August 2022, in Palm Beach County, in the Southern District of Florida, and elsewhere, the defendants,

DONALD J. TRUMP and
WALTINE NAUTA,

did corruptly conceal a record, document, and other object, and attempted to do so, with the intent to impair the object's integrity and availability for use in an official proceeding; that is—**TRUMP** and **NAUTA** hid and concealed boxes that contained documents with classification markings from Trump Attorney 1 so that Trump Attorney 1 would not find the documents and produce them to a federal grand jury.

All in violation of Title 18, United States Code, Sections 1512(c)(1) and 2.

COUNT 35
Concealing a Document in a Federal Investigation
(18 U.S.C. §§ 1519, 2)

86. The General Allegations of this Indictment are re-alleged and fully incorporated here by reference.

87. From on or about May 11, 2022, through in or around August 2022, in Palm Beach County, in the Southern District of Florida, and elsewhere, the defendants,

DONALD J. TRUMP and
WALTINE NAUTA,

did knowingly conceal, cover up, falsify, and make a false entry in any record, document, and tangible object with the intent to impede, obstruct, and influence the investigation and proper administration of any matter within the jurisdiction of a department and agency of the United States, and in relation to and contemplation of any such matter; that is—during a federal criminal investigation being conducted by the FBI, (1) **TRUMP** and **NAUTA** hid, concealed, and covered up from the FBI **TRUMP**'s continued possession of documents with classification markings at The Mar-a-Lago Club; and (2) **TRUMP** caused a false certification to be submitted to the FBI.

All in violation of Title 18, United States Code, Sections 1519 and 2.

COUNT 36
Scheme to Conceal
(18 U.S.C. §§ 1001(a)(1), 2)

88. The General Allegations of this Indictment are re-alleged and fully incorporated here by reference.

89. From on or about May 11, 2022, through in or around August 2022, in Palm Beach County, in the Southern District of Florida, and elsewhere, the defendants,

DONALD J. TRUMP and
WALTINE NAUTA,

in a matter within the jurisdiction of the judicial branch and executive branch of the United States government, did knowingly and willfully falsify, conceal, and cover up by any trick, scheme, and device a material fact; that is—during a federal grand jury investigation and a federal criminal investigation being conducted by the FBI, **TRUMP** and **NAUTA** hid and concealed from the grand jury and the FBI **TRUMP**'s continued possession of documents with classification markings.

All in violation of Title 18, United States Code, Sections 1001(a)(1) and 2.

COUNT 37
False Statements and Representations
(18 U.S.C. §§ 1001(a)(2), 2)

90. The General Allegations of this Indictment are re-alleged and fully incorporated here by reference.

91. On or about June 3, 2022, in Palm Beach County, in the Southern District of Florida, and elsewhere, the defendant,

DONALD J. TRUMP,

in a matter within the jurisdiction of the judicial branch and executive branch of the United States government, did knowingly and willfully make and cause to be made a materially false, fictitious, and fraudulent statement and representation; that is—during a federal grand jury investigation and a federal criminal investigation being conducted by the FBI, **TRUMP** caused the following false statements and representations to be made to the grand jury and the FBI in a sworn certification executed by Trump Attorney 3:

a. "A diligent search was conducted of the boxes that were moved from the White House to Florida";

b. "This search was conducted after receipt of the subpoena, in order to locate any and all documents that are responsive to the subpoena"; and

c. "Any and all responsive documents accompany this certification."

92. The statements and representations set forth above were false, as **TRUMP** knew, because **TRUMP** had directed that boxes be removed from the Storage Room before Trump Attorney 1 conducted the June 2, 2022 search for documents with classification markings, so that Trump Attorney 1's search would not and did not include all of **TRUMP**'s boxes that were removed from the White House; Trump Attorney 1's search would not and did not locate all

documents responsive to the May 11 Subpoena; and all responsive documents were not provided to the FBI and the grand jury with the certification. In fact, after June 3, 2022, more than 100 documents with classification markings remained at The Mar-a-Lago Club until the FBI search on August 8, 2022.

All in violation of Title 18, United States Code, Sections 1001(a)(2) and 2.

COUNT 38
False Statements and Representations
(18 U.S.C. § 1001(a)(2))

93. The General Allegations of this Indictment are re-alleged and fully incorporated here by reference.

94. On May 26, 2022, **NAUTA** participated in a voluntary interview with the FBI. During the interview, the FBI explained to **NAUTA** that the FBI was investigating how classified documents had been kept at The Mar-a-Lago Club, and the FBI asked **NAUTA** questions about the location and movement of **TRUMP**'s boxes before **TRUMP** provided 15 boxes to NARA on January 17, 2022. **NAUTA** was represented by counsel, and the FBI advised **NAUTA** that the interview was voluntary and that he could leave at any time. The FBI also advised **NAUTA** that it was a criminal offense to lie to the FBI. The interview was recorded.

95. On or about May 26, 2022, in Palm Beach County, in the Southern District of Florida, and elsewhere, the defendant,

WALTINE NAUTA,

in a matter within the jurisdiction of the executive branch of the United States government, did knowingly and willfully make a materially false, fictitious, and fraudulent statement and representation; that is—in a voluntary interview during a federal criminal investigation being conducted by the FBI, **NAUTA** was asked the following questions and gave the following false answers:

Question: Does any – are you aware of any boxes being brought to his home – his suite?

Answer: **No.**

* * *

Question: All right. So, so to the best of your knowledge, you're saying that those boxes that you brought onto the truck, first time you ever laid eyes on them was just the day of when [Trump Employee 2] needed you to—

Answer: **Correct.**

Question: —to take them. Okay.

* * *

Question: In knowing that we're trying to track the life of these boxes and where they could have been kept and stored and all that kind of stuff—

Answer: Mm-hm.

Question: —do you have any information that could—that would—that could help us understand, like, where they were kept, how they were kept, were they secured, were they locked? Something that makes the intelligence community feel better about these things, you know?

Answer: **I wish, I wish I could tell you. I don't know. I don't—I honestly just don't know.**

* * *

Question: And what—so, so you only saw the 15 boxes, 15, 17 boxes—

Answer: Mm-hm.

Question: —the day of the move? Even—they just showed up that day?

Answer: They were in Pine Hall. [Trump Employee 2] just asked me, hey, can we move some boxes?

Question: Okay.

Answer: And I was like, okay.

Question: So, you didn't know—had no idea how they got there before?

Answer: No.

96. The underscored statements and representations above were false, as **NAUTA** knew, because (1) **NAUTA** did in fact know that the boxes in Pine Hall had come from the Storage Room, as **NAUTA** himself, with the assistance of Trump Employee 2, had moved the boxes from the Storage Room to Pine Hall; and (2) **NAUTA** had observed the boxes in and moved them to various locations at The Mar-a-Lago Club.

All in violation of Title 18, United States Code, Section 1001(a)(2).

A TRUE BILL

[redacted]

FOREPERSON

JACK SMITH
SPECIAL COUNSEL
UNITED STATES DEPARTMENT OF JUSTICE

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

UNITED STATES OF AMERICA

v.

Donald J. Trump and
Waltine Nauta,
_____/
Defendants.

CASE NO.: _____

CERTIFICATE OF TRIAL ATTORNEY

Superseding Case Information:
New Defendant(s) (Yes or No) No
Number of New Defendants ____
Total number of counts ____

Court Division (select one)
☐ Miami ☐ Key West ☐ FTP
☐ FTL ☒ WPB

I do hereby certify that:

1. I have carefully considered the allegations of the indictment, the number of defendants, the number of probable witnesses and the legal complexities of the Indictment/Information attached hereto.
2. I am aware that the information supplied on this statement will be relied upon by the Judges of this Court in setting their calendars and scheduling criminal trials under the mandate of the Speedy Trial Act, Title 28 U.S.C. §3161.
3. Interpreter: (Yes or No) No
   List language and/or dialect: _____
4. This case will take 21 days for the parties to try.
5. Please check appropriate category and type of offense listed below:

(Check only one)		(Check only one)	
I	☐ 0 to 5 days	☐	Petty
II	☐ 6 to 10 days	☐	Minor
III	☐ 11 to 20 days	☐	Misdemeanor
IV	☒ 21 to 60 days	☒	Felony
V	☐ 61 days and over		

6. Has this case been previously filed in this District Court? (Yes or No) No
   If yes, Judge _____ Case No. _____
7. Has a complaint been filed in this matter? (Yes or No) No
   If yes, Magistrate Case No. _____
8. Does this case relate to a previously filed matter in this District Court? (Yes or No) No
   If yes, Judge _____ Case No. _____
9. Defendant(s) in federal custody as of _____
10. Defendant(s) in state custody as of _____
11. Rule 20 from the _____ District of _____
12. Is this a potential death penalty case? (Yes or No) No
13. Does this case originate from a matter pending in the Northern Region of the U.S. Attorney's Office prior to August 8, 2014 (Mag. Judge Shaniek Maynard? (Yes or No) No
14. Does this case originate from a matter pending in the Central Region of the U.S. Attorney's Office prior to October 3, 2019 (Mag. Judge Jared Strauss? (Yes or No) No
15. Did this matter involve the participation of or consultation with now Magistrate Judge Eduardo I. Sanchez during his tenure at the U.S. Attorney's Office, which concluded on January 22, 2023? No

By: _____
Jay I. Bratt
Assistant Special Counsel
Court ID No. A5502946

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: Donald J. Trump

Case No:

Counts #: 1-31

Willful Retention of National Defense Information, 18 U.S.C. § 793(e)

*** Max. Term of Imprisonment: 10 years**
*** Mandatory Min. Term of Imprisonment (if applicable): N/A**
*** Max. Supervised Release: 3 years**
*** Max. Fine: $250,000**

Count #: 32

Conspiracy to Obstruct Justice, 18 U.S.C. § 1512(k)

*** Max. Term of Imprisonment: 20 years**
*** Mandatory Min. Term of Imprisonment (if applicable): N/A**
*** Max. Supervised Release: 3 years**
*** Max. Fine: $250,000**

Count #: 33

Withholding a Document or Record, 18 U.S.C. § 1512(b)(2)(A)

*** Max. Term of Imprisonment: 20 years**
*** Mandatory Min. Term of Imprisonment (if applicable): N/A**
*** Max. Supervised Release: 3 years**
*** Max. Fine: $250,000**

***Refers only to possible term of incarceration, supervised release and fines. It does not include restitution, special assessments, parole terms, or forfeitures that may be applicable.**

Count #: 34

Corruptly Concealing a Document or Record, 18 U.S.C. § 1512(c)(1)

*** Max. Term of Imprisonment: 20 years**
*** Mandatory Min. Term of Imprisonment (if applicable): N/A**
*** Max. Supervised Release: 3 years**
*** Max. Fine: $250,000**

Count #: 35

Concealing a Document in a Federal Investigation, 18 U.S.C. § 1519

*** Max. Term of Imprisonment: 20 years**
*** Mandatory Min. Term of Imprisonment (if applicable): N/A**
*** Max. Supervised Release: 3 years**
*** Max. Fine: $250,000**

Count #: 36

Scheme to Conceal, 18 U.S.C. § 1001(a)(1)

*** Max. Term of Imprisonment: 5 years**
*** Mandatory Min. Term of Imprisonment (if applicable): N/A**
*** Max. Supervised Release: 3 years**
*** Max. Fine: $250,000**

Count #: 37

False Statements and Representations, 18 U.S.C. § 1001(a)(2)

*** Max. Term of Imprisonment: 5 years**
*** Mandatory Min. Term of Imprisonment (if applicable): N/A**
*** Max. Supervised Release: 3 years**
*** Max. Fine: $250,000**

***Refers only to possible term of incarceration, supervised release and fines. It does not include restitution, special assessments, parole terms, or forfeitures that may be applicable.**

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: Waltine Nauta

Case No:

Count #: 32

Conspiracy to Obstruct Justice, 18 U.S.C. § 1512(k)

*** Max. Term of Imprisonment: 20 years**
*** Mandatory Min. Term of Imprisonment (if applicable): N/A**
*** Max. Supervised Release: 3 years**
*** Max. Fine: $250,000**

Count #: 33

Withholding a Document or Record, 18 U.S.C. § 1512(b)(2)(A)

*** Max. Term of Imprisonment: 20 years**
*** Mandatory Min. Term of Imprisonment (if applicable): N/A**
*** Max. Supervised Release: 3 years**
*** Max. Fine: $250,000**

Count #: 34

Corruptly Concealing a Document or Record, 18 U.S.C. § 1512(c)(1)

*** Max. Term of Imprisonment: 20 years**
*** Mandatory Min. Term of Imprisonment (if applicable): N/A**
*** Max. Supervised Release: 3 years**
*** Max. Fine: $250,000**

Count #: 35

Concealing a Document in a Federal Investigation, 18 U.S.C. § 1519

*** Max. Term of Imprisonment: 20 years**
*** Mandatory Min. Term of Imprisonment (if applicable): N/A**
*** Max. Supervised Release: 3 years**
*** Max. Fine: $250,000**

***Refers only to possible term of incarceration, supervised release and fines. It does not include restitution, special assessments, parole terms, or forfeitures that may be applicable.**

Count #: 36

Scheme to Conceal, 18 U.S.C. § 1001(a)(1)

*** Max. Term of Imprisonment: 5 years**
*** Mandatory Min. Term of Imprisonment (if applicable): N/A**
*** Max. Supervised Release: 3 years**
*** Max. Fine: $250,000**

Count #: 38

False Statements and Representations, 18 U.S.C. § 1001(a)(2)

*** Max. Term of Imprisonment: 5 years**
*** Mandatory Min. Term of Imprisonment (if applicable): N/A**
*** Max. Supervised Release: 3 years**
*** Max. Fine: $250,000**

***Refers only to possible term of incarceration, supervised release and fines. It does not include restitution, special assessments, parole terms, or forfeitures that may be applicable.**

TAB 85

Case No. 23-cr-80101-AMC, S.D. Fla.,

Doc. 85

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

Case No. 23-CR-80101-CANNON(s)
18 U.S.C. § 793(e)
18 U.S.C. § 1512(k)
18 U.S.C. § 1512(b)(2)(A)
18 U.S.C. § 1512(b)(2)(B)
18 U.S.C. § 1512(c)(1)
18 U.S.C. § 1519
18 U.S.C. § 1001(a)(1)
18 U.S.C. § 1001(a)(2)
18 U.S.C. § 2

UNITED STATES OF AMERICA

v.

DONALD J. TRUMP,
WALTINE NAUTA, and
CARLOS DE OLIVEIRA,

Defendants.
_____/

SUPERSEDING INDICTMENT

The Grand Jury charges that:

GENERAL ALLEGATIONS

At times material to this Superseding Indictment, on or about the dates and approximate times stated below:

Introduction

1. Defendant **DONALD J. TRUMP** was the forty-fifth President of the United States of America. He held office from January 20, 2017, until January 20, 2021. As president, **TRUMP** had lawful access to the most sensitive classified documents and national defense information gathered and owned by the United States government, including information from the agencies

that comprise the United States Intelligence Community and the United States Department of Defense.

2. Over the course of his presidency, **TRUMP** gathered newspapers, press clippings, letters, notes, cards, photographs, official documents, and other materials in cardboard boxes that he kept in the White House. Among the materials **TRUMP** stored in his boxes were hundreds of classified documents.

3. The classified documents **TRUMP** stored in his boxes included information regarding defense and weapons capabilities of both the United States and foreign countries; United States nuclear programs; potential vulnerabilities of the United States and its allies to military attack; and plans for possible retaliation in response to a foreign attack. The unauthorized disclosure of these classified documents could put at risk the national security of the United States, foreign relations, the safety of the United States military, and human sources and the continued viability of sensitive intelligence collection methods.

4. At 12:00 p.m. on January 20, 2021, **TRUMP** ceased to be president. As he departed the White House, **TRUMP** caused scores of boxes, many of which contained classified documents, to be transported to The Mar-a-Lago Club in Palm Beach, Florida, where he maintained his residence. **TRUMP** was not authorized to possess or retain those classified documents.

5. The Mar-a-Lago Club was an active social club, which, between January 2021 and August 2022, hosted events for tens of thousands of members and guests. After **TRUMP**'s presidency, The Mar-a-Lago Club was not an authorized location for the storage, possession, review, display, or discussion of classified documents. Nevertheless, **TRUMP** stored his boxes containing classified documents in various locations at The Mar-a-Lago Club—including in a ballroom, a bathroom and shower, an office space, his bedroom, and a storage room.

6. On two occasions in 2021, **TRUMP** showed classified documents to others, as follows:

a. In July 2021, at Trump National Golf Club in Bedminster, New Jersey ("The Bedminster Club"), during an audio-recorded meeting with a writer, a publisher, and two members of his staff, none of whom possessed a security clearance, **TRUMP** showed and described a "plan of attack" that **TRUMP** said was prepared for him by the Department of Defense and a senior military official. **TRUMP** told the individuals that the plan was "highly confidential" and "secret." **TRUMP** also said, "as president I could have declassified it," and, "Now I can't, you know, but this is still a secret."

b. In August or September 2021, at The Bedminster Club, **TRUMP** showed a representative of his political action committee who did not possess a security clearance a classified map related to a military operation and told the representative that he should not be showing it to the representative and that the representative should not get too close.

7. On March 30, 2022, the Federal Bureau of Investigation ("FBI") opened a criminal investigation into the unlawful retention of classified documents at The Mar-a-Lago Club. A federal grand jury investigation began the next month. The grand jury issued a subpoena requiring **TRUMP** to turn over all documents with classification markings. **TRUMP** endeavored to obstruct the FBI and grand jury investigations and conceal his continued retention of classified documents by, among other things:

a. suggesting that his attorney falsely represent to the FBI and grand jury that **TRUMP** did not have documents called for by the grand jury subpoena;

b. directing defendant **WALTINE NAUTA** to move boxes of documents to conceal them from **TRUMP**'s attorney, the FBI, and the grand jury;

c. suggesting that his attorney hide or destroy documents called for by the grand jury subpoena;

d. providing to the FBI and grand jury just some of the documents called for by the grand jury subpoena, while claiming that he was cooperating fully;

e. causing a certification to be submitted to the FBI and grand jury falsely representing that all documents called for by the grand jury subpoena had

been produced—while knowing that, in fact, not all such documents had been produced; and

f. attempting to delete security camera footage at The Mar-a-Lago Club to conceal information from the FBI and grand jury.

8. As a result of **TRUMP**'s retention of classified documents after his presidency and refusal to return them, hundreds of classified documents were not recovered by the United States government until 2022, as follows:

a. On January 17, nearly one year after **TRUMP** left office, and after months of demands by the National Archives and Records Administration for **TRUMP** to provide all missing presidential records, **TRUMP** provided only 15 boxes, which contained 197 documents with classification markings.

b. On June 3, in response to a grand jury subpoena demanding the production of all documents with classification markings, **TRUMP**'s attorney provided to the FBI 38 more documents with classification markings.

c. On August 8, pursuant to a court-authorized search warrant, the FBI recovered from **TRUMP**'s office and a storage room at The Mar-a-Lago Club 102 more documents with classification markings.

TRUMP's Co-Conspirators

9. Defendant **NAUTA** was a member of the United States Navy stationed as a valet in the White House during **TRUMP**'s presidency. Beginning in August 2021, **NAUTA** became an executive assistant in The Office of Donald J. Trump and served as **TRUMP**'s personal aide or "body man." **NAUTA** reported to **TRUMP**, worked closely with **TRUMP**, and traveled with **TRUMP**.

10. Beginning in January 2022, Defendant **CARLOS DE OLIVEIRA** was employed as the property manager at The Mar-a-Lago Club. Prior to holding the position of property manager, **DE OLIVEIRA** was employed as a valet at The Mar-a-Lago Club.

The Mar-a-Lago Club

11. The Mar-a-Lago Club was located on South Ocean Boulevard in Palm Beach, Florida, and included **TRUMP**'s residence, more than 25 guest rooms, two ballrooms, a spa, a gift store, exercise facilities, office space, and an outdoor pool and patio. As of January 2021, The Mar-a-Lago Club had hundreds of members and was staffed by more than 150 full-time, part-time, and temporary employees.

12. Between January 2021 and August 2022, The Mar-a-Lago Club hosted more than 150 social events, including weddings, movie premieres, and fundraisers that together drew tens of thousands of guests.

13. The United States Secret Service (the "Secret Service") provided protection services to **TRUMP** and his family after he left office, including at The Mar-a-Lago Club, but it was not responsible for the protection of **TRUMP**'s boxes or their contents. **TRUMP** did not inform the Secret Service that he was storing boxes containing classified documents at The Mar-a-Lago Club.

Classified Information

14. National security information was information owned by, produced by, produced for, and under the control of the United States government. Pursuant to Executive Order 12958, signed on April 17, 1995, as amended by Executive Order 13292 on March 25, 2003, and Executive Order 13526 on December 29, 2009, national security information was classified as "TOP SECRET," "SECRET," or "CONFIDENTIAL," as follows:

a. Information was classified as TOP SECRET if the unauthorized disclosure of that information reasonably could be expected to cause exceptionally grave damage to the national security that the original classification authority was able to identify or describe.

b. Information was classified as SECRET if the unauthorized disclosure of that information reasonably could be expected to cause serious damage to the national security that the original classification authority was able to identify or describe.

c. Information was classified as CONFIDENTIAL if the unauthorized disclosure of that information reasonably could be expected to cause damage to the national security that the original classification authority was able to identify or describe.

15. The classification marking "NOFORN" stood for "Not Releasable to Foreign Nationals" and denoted that dissemination of that information was limited to United States persons.

16. Classified information related to intelligence sources, methods, and analytical processes was designated as Sensitive Compartmented Information ("SCI"). SCI was to be processed, stored, used, or discussed in an accredited Sensitive Compartmented Information Facility ("SCIF"), and only individuals with the appropriate security clearance and additional SCI permissions were authorized to have access to such national security information.

17. When the vulnerability of, or threat to, specific classified information was exceptional, and the normal criteria for determining eligibility for access to classified information were insufficient to protect the information from unauthorized disclosure, the United States could establish Special Access Programs ("SAPs") to further protect the classified information. The number of these programs was to be kept to an absolute minimum and limited to programs in which the number of persons who ordinarily would have access would be reasonably small and commensurate with the objective of providing enhanced protection for the information involved. Only individuals with the appropriate security clearance and additional SAP permissions were authorized to have access to such national security information, which was subject to enhanced handling and storage requirements.

18. Pursuant to Executive Order 13526, information classified at any level could be lawfully accessed only by persons determined by an appropriate United States government official to be eligible for access to classified information and who had signed an approved non-disclosure agreement, who received a security clearance, and who had a "need-to-know" the classified information. After his presidency, **TRUMP** was not authorized to possess or retain classified documents.

19. Executive Order 13526 provided that a former president could obtain a waiver of the "need-to-know" requirement, if the agency head or senior agency official of the agency that originated the classified information: (1) determined in writing that access was consistent with the interest of national security and (2) took appropriate steps to protect classified information from unauthorized disclosure or compromise and ensured that the information was safeguarded in a manner consistent with the order. **TRUMP** did not obtain any such waiver after his presidency.

The Executive Branch Departments and Agencies Whose Classified Documents TRUMP Retained After His Presidency

20. As part of his official duties as president, **TRUMP** received intelligence briefings from high-level United States government officials, including briefings from the Director of the Central Intelligence Agency, the Chairman of the Joint Chiefs of Staff, senior White House officials, and a designated briefer. He regularly received a collection of classified intelligence from the United States Intelligence Community ("USIC") known as the "President's Daily Brief."

21. The USIC's mission was to collect, analyze, and deliver foreign intelligence and counterintelligence information to America's leaders, including the president, policymakers, law enforcement, and the military, so they could make sound decisions to protect the United States.

The USIC consisted of United States executive branch departments and agencies responsible for the conduct of foreign relations and the protection of national security.

22. After his presidency, **TRUMP** retained classified documents originated by, or implicating the equities of, multiple USIC members and other executive branch departments and agencies, including the following:

a. **The Central Intelligence Agency ("CIA").** CIA was responsible for providing intelligence on foreign countries and global issues to the president and other policymakers to help them make national security decisions.

b. **The Department of Defense ("DoD").** DoD was responsible for providing the military forces needed to deter war and ensure national security. Some of the executive branch agencies comprising the USIC were within DoD.

c. **The National Security Agency.** The National Security Agency was a combat support agency within DoD and a member of the USIC responsible for foreign signals intelligence and cybersecurity. This included collecting, processing, and disseminating to United States policymakers and military leaders foreign intelligence derived from communications and information systems; protecting national security systems; and enabling computer network operations.

d. **The National Geospatial Intelligence Agency.** The National Geospatial Intelligence Agency was a combat support agency within DoD responsible for the exploitation and analysis of imagery, imagery intelligence, and geospatial information in support of the national security objectives of the United States and the geospatial intelligence requirements of DoD, the Department of State, and other federal agencies.

e. **The National Reconnaissance Office.** The National Reconnaissance Office was an agency within DoD responsible for developing, acquiring, launching, and operating space-based surveillance and reconnaissance systems that collected and delivered intelligence to enhance national security.

f. **The Department of Energy.** The Department of Energy was responsible for maintaining a safe, secure, and effective nuclear deterrent to protect national security, including ensuring the effectiveness of the United States nuclear weapons stockpile without nuclear explosive testing.

g. **The Department of State and Bureau of Intelligence and Research.** The Department of State was responsible for protecting and promoting United States security, prosperity, and democratic values. Within the Department of State, the Bureau of Intelligence and Research was a member of the USIC and responsible for providing intelligence to inform diplomacy and support United States diplomats.

TRUMP's Public Statements on Classified Information

23. As a candidate for President of the United States, **TRUMP** made the following public statements, among others, about classified information:

a. On August 18, 2016, **TRUMP** stated, "In my administration I'm going to enforce all laws concerning the protection of classified information. No one will be above the law."

b. On September 6, 2016, **TRUMP** stated, "We also need to fight this battle by collecting intelligence and then protecting, protecting our classified secrets. . . . We can't have someone in the Oval Office who doesn't understand the meaning of the word confidential or classified."

c. On September 7, 2016, **TRUMP** stated, "[O]ne of the first things we must do is to enforce all classification rules and to enforce all laws relating to the handling of classified information."

d. On September 19, 2016, **TRUMP** stated, "We also need the best protection of classified information."

e. On November 3, 2016, **TRUMP** stated, "Service members here in North Carolina have risked their lives to acquire classified intelligence to protect our country."

24. As President of the United States, on July 26, 2018, **TRUMP** issued the following statement about classified information:

> As the head of the executive branch and Commander in Chief, I have a unique, Constitutional responsibility to protect the Nation's classified information, including by controlling access to it. . . . More broadly, the issue of [a former executive branch official's] security clearance raises larger questions about the practice of former officials maintaining access to our Nation's most sensitive secrets long after their time in Government has ended. Such access is particularly inappropriate when former officials have transitioned

> into highly partisan positions and seek to use real or perceived access to sensitive information to validate their political attacks. Any access granted to our Nation's secrets should be in furtherance of national, not personal, interests.

TRUMP's Retention of Classified Documents After His Presidency

25. In January 2021, as he was preparing to leave the White House, **TRUMP** and his White House staff, including **NAUTA**, packed items, including some of **TRUMP**'s boxes. **TRUMP** was personally involved in this process. **TRUMP** caused his boxes, containing hundreds of classified documents, to be transported from the White House to The Mar-a-Lago Club.

26. From January through March 15, 2021, some of **TRUMP**'s boxes were stored in The Mar-a-Lago Club's White and Gold Ballroom, in which events and gatherings took place. **TRUMP**'s boxes were for a time stacked on the ballroom's stage, as depicted in the photograph below (redacted to obscure an individual's identity).



27. In March 2021, **NAUTA** and others moved some of **TRUMP**'s boxes from the White and Gold Ballroom to the business center at The Mar-a-Lago Club.

28. On April 5, 2021, an employee of The Office of Donald J. Trump ("Trump Employee 1") texted another employee of that office ("Trump Employee 2") to ask whether **TRUMP**'s boxes could be moved out of the business center to make room for staff to use it as an office. Trump Employee 2 replied, "Woah!! Ok so potus specifically asked Walt for those boxes to be in the business center because they are his 'papers.'" Later that day, Trump Employee 1 and Trump Employee 2 exchanged the following text messages:

Trump Employee 2:

> We can definitely make it work if we move his papers into the lake room?

Trump Employee 1:

> There is still a little room in the shower where his other stuff is. Is it only his papers he cares about? Theres some other stuff in there that are not papers. Could that go to storage? Or does he want everything in there on property

Trump Employee 2:

> Yes - anything that's not the beautiful mind paper boxes can definitely go to storage. Want to take a look at the space and start moving tomorrow AM?

29. After the text exchange between Trump Employee 1 and Trump Employee 2, in April 2021, some of **TRUMP**'s boxes were moved from the business center to a bathroom and shower in The Mar-a-Lago Club's Lake Room, as depicted in the photograph below.



30. In May 2021, **TRUMP** directed that a storage room on the ground floor of The Mar-a-Lago Club (the "Storage Room") be cleaned out so that it could be used to store his boxes. The hallway leading to the Storage Room could be reached from multiple outside entrances, including one accessible from The Mar-a-Lago Club pool patio through a doorway that was often kept open. The Storage Room was near the liquor supply closet, linen room, lock shop, and various other rooms.

31. On June 24, 2021, **TRUMP**'s boxes that were in the Lake Room were moved to the Storage Room. After the move, there were more than 80 boxes in the Storage Room, as depicted in the photographs below.





32. On December 7, 2021, **NAUTA** found several of **TRUMP**'s boxes fallen and their contents spilled onto the floor of the Storage Room, including a document marked "SECRET//REL

TO USA, FVEY," which denoted that the information in the document was releasable only to the Five Eyes intelligence alliance consisting of Australia, Canada, New Zealand, the United Kingdom, and the United States. **NAUTA** texted Trump Employee 2, "I opened the door and found this…" **NAUTA** also attached two photographs he took of the spill. Trump Employee 2 replied, "Oh no oh no," and "I'm sorry potus had my phone." One of the photographs **NAUTA** texted to Trump Employee 2 is depicted below with the visible classified information redacted. **TRUMP**'s unlawful retention of this document is charged in Count 8 of this Superseding Indictment.



TRUMP's Disclosures of Classified Information in Private Meetings

33. In May 2021, **TRUMP** caused some of his boxes to be brought to his summer residence at The Bedminster Club. Like The Mar-a-Lago Club, after **TRUMP**'s presidency, The

Bedminster Club was not an authorized location for the storage, possession, review, display, or discussion of classified documents.

34. On July 21, 2021, when he was no longer president, **TRUMP** gave an interview in his office at The Bedminster Club to a writer and a publisher in connection with a then-forthcoming book. Two members of **TRUMP**'s staff also attended the interview, which was recorded with **TRUMP**'s knowledge and consent. Before the interview, the media had published reports that, at the end of **TRUMP**'s term as president, a senior military official (the "Senior Military Official") purportedly feared that **TRUMP** might order an attack on Country A and that the Senior Military Official advised **TRUMP** against doing so.

35. Upon greeting the writer, publisher, and his two staff members, **TRUMP** stated, "Look what I found, this was [the Senior Military Official's] plan of attack, read it and just show . . . it's interesting." Later in the interview, **TRUMP** engaged in the following exchange:

TRUMP: Well, with [the Senior Military Official]—uh, let me see that, I'll show you an example. He said that I wanted to attack [Country A]. Isn't it amazing? I have a big pile of papers, this thing just came up. Look. This was him. They presented me this—this is off the record, but—they presented me this. This was him. This was the Defense Department and him.

WRITER: Wow.

TRUMP: We looked at some. This was him. This wasn't done by me, this was him. All sorts of stuff—pages long, look.

STAFFER: Mm.

TRUMP: Wait a minute, let's see here.

STAFFER: *[Laughter]* Yeah.

TRUMP: I just found, isn't that amazing? This totally wins my case, you know.

STAFFER: Mm-hm.

TRUMP: Except it is like, highly confidential.

STAFFER: Yeah. *[Laughter]*

TRUMP: Secret. This is secret information. Look, look at this. You attack, and—

* * *

TRUMP: By the way. Isn't that incredible?

STAFFER: Yeah.

TRUMP: I was just thinking, because we were talking about it. And you know, he said, "he wanted to attack [Country A], and what . . ."

STAFFER: You did.

TRUMP: This was done by the military and given to me. Uh, I think we can probably, right?

STAFFER: I don't know, we'll, we'll have to see. Yeah, we'll have to try to—

TRUMP: Declassify it.

STAFFER: —figure out a—yeah.

TRUMP: See as president I could have declassified it.

STAFFER: Yeah. *[Laughter]*

TRUMP: Now I can't, you know, but this is still a secret.

STAFFER: Yeah. *[Laughter]* Now we have a problem.

TRUMP: Isn't that interesting?

At the time of this exchange, the writer, the publisher, and **TRUMP**'s two staff members did not have security clearances or any need-to-know any classified information about a plan of attack on

Country A. The document that **TRUMP** possessed and showed on July 21, 2021, is charged as Count 32 in this Superseding Indictment.

36. In August or September 2021, when he was no longer president, **TRUMP** met in his office at The Bedminster Club with a representative of his political action committee (the "PAC Representative"). During the meeting, **TRUMP** commented that an ongoing military operation in Country B was not going well. **TRUMP** showed the PAC Representative a classified map of Country B and told the PAC Representative that he should not be showing the map to the PAC Representative and to not get too close. The PAC Representative did not have a security clearance or any need-to-know classified information about the military operation.

37. On February 16, 2017, four years before **TRUMP**'s disclosures of classified information set forth above, **TRUMP** said at a press conference:

> The first thing I thought of when I heard about it is, how does the press get this information that's classified? How do they do it? You know why? Because it's an illegal process, and the press should be ashamed of themselves. But more importantly, the people that gave out the information to the press should be ashamed of themselves. Really ashamed.

TRUMP's Production of 15 Cardboard Boxes to the National Archives and Records Administration

38. Beginning in May 2021, the National Archives and Records Administration ("NARA"), which was responsible for archiving presidential records, repeatedly demanded that **TRUMP** turn over presidential records that he had kept after his presidency. On multiple occasions, beginning in June, NARA warned **TRUMP** through his representatives that if he did not comply, it would refer the matter of the missing records to the Department of Justice.

39. Between November 2021 and January 2022, **NAUTA** and Trump Employee 2—at **TRUMP**'s direction—brought boxes from the Storage Room to **TRUMP**'s residence for **TRUMP** to review.

40. On November 12, 2021, Trump Employee 2 provided **TRUMP** a photograph of his boxes in the Storage Room by taping it to one of the boxes that Trump Employee 2 had placed in **TRUMP**'s residence. Trump Employee 2 provided **TRUMP** the photograph so that **TRUMP** could see how many of his boxes were stored in the Storage Room. The photograph, shown below, depicted a wall of the Storage Room against which dozens of **TRUMP**'s boxes were stacked.



41. On November 17, 2021, **NAUTA** texted Trump Employee 2 about the photograph Trump Employee 2 had provided to **TRUMP**, stating, "He mentioned about a picture of the 'boxes' he wants me to see it?" Trump Employee 2 replied, "Calling you shortly."

42. On November 25, 2021, Trump Employee 2 texted **NAUTA** about **TRUMP**'s review of the contents of his boxes, asking, "Has he mentioned boxes to you? I delivered some,

but I think he may need more. Could you ask if he'd like more in pine hall?" Pine Hall was an entry room in **TRUMP**'s residence. **NAUTA** replied in three successive text messages:

Nothing about boxes yet

He has one he's working on in pine hall

Knocked out 2 boxes yesterday

43. On November 29, 2021, Trump Employee 2 texted **NAUTA**, asking, "Next you are on property (no rush) could you help me bring 4 more boxes up?" **NAUTA** replied, "Yes!! Of course."

44. On December 29, 2021, Trump Employee 2 texted a **TRUMP** representative who was in contact with NARA ("Trump Representative 1"), "box answer will be wrenched out of him today, promise!" The next day, Trump Representative 1 replied in two successive text messages:

Hey - Just checking on Boxes…

would love to have a number to them today

Trump Employee 2 spoke to **TRUMP** and then responded a few hours later in two successive text messages:

12

Is his number

45. On January 13, 2022, **NAUTA** texted Trump Employee 2 about **TRUMP**'s "tracking" of boxes, stating, "He's tracking the boxes, more to follow today on whether he wants to go through more today or tomorrow." Trump Employee 2 replied, "Thank you!"

46. On January 15, 2022, **NAUTA** sent Trump Employee 2 four successive text messages:

One thing he asked

Was for new covers for the boxes, for Monday m.

> Morning
>
> *can we get new box covers before giving these to them on Monday? They have too much writing on them..I marked too much

Trump Employee 2 replied, "Yes, I will get that!"

47. On January 17, 2022, Trump Employee 2 and **NAUTA** gathered 15 boxes from **TRUMP**'s residence, loaded the boxes in **NAUTA**'s car, and took them to a commercial truck for delivery to NARA.

48. When interviewed by the FBI in May 2022 regarding the location and movement of boxes before the production to NARA, **NAUTA** made false and misleading statements as set forth in Count 38 of this Superseding Indictment, including:

a. falsely stating that he was not aware of **TRUMP**'s boxes being brought to **TRUMP**'s residence for his review before **TRUMP** provided 15 boxes to NARA in January 2022;

b. falsely stating that he did not know how the boxes that he and Trump Employee 2 brought from **TRUMP**'s residence to the commercial truck for delivery to NARA on January 17, 2022, had gotten to the residence; and

c. when asked whether he knew where **TRUMP**'s boxes had been stored before they were in **TRUMP**'s residence and whether they had been in a secure or locked location, **NAUTA** falsely responded, "I wish, I wish I could tell you. I don't know. I don't—I honestly just don't know."

49. When the 15 boxes that **TRUMP** had provided reached NARA in January 2022, NARA reviewed the contents and determined that 14 of the boxes contained documents with classification markings. Specifically, as the FBI later determined, the boxes contained 197 documents with classification markings, of which 98 were marked "SECRET," 30 were marked "TOP SECRET," and the remainder were marked "CONFIDENTIAL." Some of those documents also contained SCI and SAP markings.

50. On February 9, 2022, NARA referred the discovery of classified documents in **TRUMP**'s boxes to the Department of Justice for investigation.

The FBI and Grand Jury Investigations

51. On March 30, 2022, the FBI opened a criminal investigation.

52. On April 26, 2022, a federal grand jury opened an investigation.

The Defendants' Concealment of Boxes

53. On May 11, 2022, the grand jury issued a subpoena (the "May 11 Subpoena") to The Office of Donald J. Trump requiring the production of all documents with classification markings in the possession, custody, or control of **TRUMP** or The Office of Donald J. Trump. Two attorneys representing **TRUMP** ("Trump Attorney 1" and "Trump Attorney 2") informed **TRUMP** of the May 11 Subpoena, and he authorized Trump Attorney 1 to accept service.

54. On May 22, 2022, **NAUTA** entered the Storage Room at 3:47 p.m. and left approximately 34 minutes later, carrying one of **TRUMP**'s boxes.

55. On May 23, 2022, **TRUMP** met with Trump Attorney 1 and Trump Attorney 2 at The Mar-a-Lago Club to discuss the response to the May 11 Subpoena. Trump Attorney 1 and Trump Attorney 2 told **TRUMP** that they needed to search for documents that would be responsive to the subpoena and provide a certification that there had been compliance with the subpoena. **TRUMP**, in sum and substance, made the following statements, among others, as memorialized by Trump Attorney 1:

a. I don't want anybody looking, I don't want anybody looking through my boxes, I really don't, I don't want you looking through my boxes.

b. Well what if we, what happens if we just don't respond at all or don't play ball with them?

c. Wouldn't it be better if we just told them we don't have anything here?

d. Well look isn't it better if there are no documents?

56. While meeting with Trump Attorney 1 and Trump Attorney 2 on May 23, **TRUMP**, in sum and substance, told the following story, as memorialized by Trump Attorney 1:

> [Attorney], he was great, he did a great job. You know what? He said, he said that it – that it was him. That he was the one who deleted all of her emails, the 30,000 emails, because they basically dealt with her scheduling and her going to the gym and her having beauty appointments. And he was great. And he, so she didn't get in any trouble because he said that he was the one who deleted them.

TRUMP related the story more than once that day.

57. On May 23, **TRUMP** also confirmed his understanding with Trump Attorney 1 that Trump Attorney 1 would return to The Mar-a-Lago Club on June 2 to search for any documents with classification markings to produce in response to the May 11 Subpoena. Trump Attorney 1 made it clear to **TRUMP** that Trump Attorney 1 would conduct the search for responsive documents by looking through **TRUMP**'s boxes that had been transported from the White House and remained in storage at The Mar-a-Lago Club. **TRUMP** indicated that he wanted to be at The Mar-a-Lago Club when Trump Attorney 1 returned to review his boxes on June 2, and that **TRUMP** would change his summer travel plans to do so. **TRUMP** told Trump Attorney 2 that Trump Attorney 2 did not need to be present for the review of boxes.

58. After meeting with Trump Attorney 1 and Trump Attorney 2 on May 23, **TRUMP** delayed his departure from The Mar-a-Lago Club to The Bedminster Club for the summer so that he would be present at The Mar-a-Lago Club on June 2, when Trump Attorney 1 returned to review the boxes.

59. Between **TRUMP**'s May 23 meeting with Trump Attorney 1 and Trump Attorney 2 to discuss the May 11 Subpoena, and June 2, when Trump Attorney 1 returned to The Mar-a-Lago Club to review the boxes in the Storage Room, **NAUTA** removed—at **TRUMP**'s direction—

a total of approximately 64 boxes from the Storage Room and brought them to **TRUMP**'s residence, as set forth below:

a. On May 24, 2022, between 5:30 p.m. and 5:38 p.m., **NAUTA** removed three boxes from the Storage Room.

b. On May 30, 2022, at 9:08 a.m., **TRUMP** and **NAUTA** spoke by phone for approximately 30 seconds. Between 10:02 a.m. and 11:51 a.m., **NAUTA** removed a total of approximately 50 boxes from the Storage Room.

c. On May 30, 2022, at 12:33 p.m., a Trump family member texted **NAUTA**:

> Good afternoon Walt,
> Happy Memorial Day!
>
> I saw you put boxes to Potus room. Just FYI and I will tell him as well:
> Not sure how many he wants to take on Friday on the plane. We will NOT have a room for them. Plane will be full with luggage.
> Thank you!

NAUTA replied:

> Good Afternoon Ma'am [Smiley Face Emoji]
> Thank you so much.
>
> I think he wanted to pick from them. I don't imagine him wanting to take the boxes.
>
> He told me to put them in the room and that he was going to talk to you about them.

d. On June 1, 2022, beginning at 12:52 p.m., **NAUTA** removed approximately 11 boxes from the Storage Room.

60. On June 1, 2022, **TRUMP** spoke with Trump Attorney 1 by phone and asked whether Trump Attorney 1 was coming to The Mar-a-Lago Club the next day and for exactly what purpose. Trump Attorney 1 reminded **TRUMP** that Trump Attorney 1 was going to review the boxes that had been transported from the White House and remained in storage at The Mar-a-Lago

Club so that Trump Attorney 1 could have a custodian of records certify that the May 11 subpoena had been complied with fully.

61. On June 2, 2022, the day that Trump Attorney 1 was scheduled to review **TRUMP**'s boxes in the Storage Room, **TRUMP** spoke with **NAUTA** on the phone at 9:29 a.m. for approximately 24 seconds.

62. Later that day, between 12:33 p.m. and 12:52 p.m., **NAUTA** and **DE OLIVEIRA** moved approximately 30 boxes from **TRUMP**'s residence to the Storage Room.

63. In sum, between May 23, 2022, and June 2, 2022, before Trump Attorney 1's review of **TRUMP**'s boxes in the Storage Room, **NAUTA**—at **TRUMP**'s direction—moved approximately 64 boxes from the Storage Room to **TRUMP**'s residence, and **NAUTA** and **DE OLIVEIRA** brought to the Storage Room only approximately 30 boxes. Neither **TRUMP** nor **NAUTA** informed Trump Attorney 1 of this information.

The False Certification to the FBI and the Grand Jury

64. On the afternoon of June 2, 2022, as **TRUMP** had been informed, Trump Attorney 1 arrived at The Mar-a-Lago Club to review **TRUMP**'s boxes to look for documents with classification markings in response to the May 11 Subpoena. **TRUMP** met with Trump Attorney 1 before Trump Attorney 1 conducted the review. **NAUTA** escorted Trump Attorney 1 to the Storage Room.

65. Between 3:53 p.m. and 6:23 p.m., Trump Attorney 1 reviewed the contents of **TRUMP**'s boxes in the Storage Room. Trump Attorney 1 located 38 documents with classification markings inside the boxes, which Trump Attorney 1 removed and placed in a Redweld folder. Trump Attorney 1 contacted **NAUTA** and asked him to bring clear duct tape to the Storage Room, which **NAUTA** did. Trump Attorney 1 used the clear duct tape to seal the Redweld folder with the documents with classification markings inside.

66. After Trump Attorney 1 finished sealing the Redweld folder containing the documents with classification markings that he had found inside **TRUMP**'s boxes, **NAUTA** took Trump Attorney 1 to a dining room in The Mar-a-Lago Club to meet with **TRUMP**. After Trump Attorney 1 confirmed that he was finished with his search of the Storage Room, **TRUMP** asked, "Did you find anything? . . . Is it bad? Good?"

67. **TRUMP** and Trump Attorney 1 then discussed what to do with the Redweld folder containing documents with classification markings and whether Trump Attorney 1 should bring them to his hotel room and put them in a safe there. During that conversation, **TRUMP** made a plucking motion, as memorialized by Trump Attorney 1:

> He made a funny motion as though – well okay why don't you take them with you to your hotel room and if there's anything really bad in there, like, you know, pluck it out. And that was the motion that he made. He didn't say that.

68. That evening, Trump Attorney 1 contacted the Department of Justice and requested that an FBI agent meet him at The Mar-a-Lago Club the next day, June 3, so that he could turn over the documents responsive to the May 11 Subpoena.

69. Also that evening, Trump Attorney 1 contacted another **TRUMP** attorney ("Trump Attorney 3") and asked her if she would come to The Mar-a-Lago Club the next morning to act as a custodian of records and sign a certification regarding the search for documents with classification markings in response to the May 11 Subpoena. Trump Attorney 3, who had no role in the review of **TRUMP**'s boxes in the Storage Room, agreed.

70. The next day, on June 3, 2022, at Trump Attorney 1's request, Trump Attorney 3 signed a certification as the custodian of records for The Office of Donald J. Trump and took it to The Mar-a-Lago Club to provide it to the Department of Justice and FBI. In the certification, Trump Attorney 3—who performed no search of **TRUMP**'s boxes, had not reviewed the May 11

Subpoena, and had not reviewed the contents of the Redweld folder—stated, among other things, that "[b]ased upon the information that [had] been provided to" her:

a. "A diligent search was conducted of the boxes that were moved from the White House to Florida";

b. "This search was conducted after receipt of the subpoena, in order to locate any and all documents that are responsive to the subpoena"; and

c. "Any and all responsive documents accompany this certification."

71. These statements were false because, among other reasons, **TRUMP** had directed **NAUTA** to move boxes before Trump Attorney 1's June 2 review, so that many boxes were not searched and many documents responsive to the May 11 Subpoena could not be found—and in fact were not found—by Trump Attorney 1.

72. Shortly after Trump Attorney 3 executed the false certification, on June 3, 2022, Trump Attorney 1 and Trump Attorney 3 met at The Mar-a-Lago Club with personnel from the Department of Justice and FBI. Trump Attorney 1 and Trump Attorney 3 turned over the Redweld folder containing documents with classification markings, as well as the false certification signed by Trump Attorney 3 as custodian of records. **TRUMP**, who had delayed his departure from The Mar-a-Lago Club, joined Trump Attorney 1 and Trump Attorney 3 for some of the meeting. **TRUMP** claimed to the Department of Justice and FBI that he was "an open book."

73. Earlier that same day, **NAUTA, DE OLIVEIRA,** and others loaded several of **TRUMP**'s boxes along with other items on aircraft that flew **TRUMP** and his family north for the summer.

The Attempt to Delete Security Camera Footage

74. On June 3, 2022, when FBI agents were at The Mar-a-Lago Club to collect the documents with classification markings from Trump Attorney 1 and Trump Attorney 3, the agents observed that there were surveillance cameras located near the Storage Room.

75. On June 22, 2022, the Department of Justice emailed an attorney for **TRUMP**'s business organization a draft grand jury subpoena requiring the production of certain security camera footage from The Mar-a-Lago Club, including footage from cameras "on ground floor (basement)," where the Storage Room was located.

76. On June 23, 2022, at 8:46 p.m., **TRUMP** called **DE OLIVEIRA** and they spoke for approximately 24 minutes.

77. On Friday, June 24, 2022, the Department of Justice emailed the attorney for **TRUMP**'s business organization the final grand jury subpoena, which required the production of "[a]ny and all surveillance records, videos, images, photographs and/or CCTV from internal cameras" at certain locations at The Mar-a-Lago Club, including "on ground floor (basement)," from January 10, 2022, to June 24, 2022.

78. That same day, June 24, 2022, at 1:25 p.m., Trump Attorney 1 spoke with **TRUMP** by phone regarding the subpoena for security camera footage. At 3:44 p.m., **NAUTA** received a text message from a co-worker, Trump Employee 3, indicating that **TRUMP** wanted to see **NAUTA**. Less than two hours later, **NAUTA**—who was scheduled to travel with **TRUMP** to Illinois the next day—changed his travel schedule and began to make arrangements to go to Palm Beach, Florida, instead.

79. **NAUTA** provided inconsistent explanations to colleagues for his sudden travel to Florida. At 7:14 p.m. on June 24, he texted one person that he would not be traveling with **TRUMP**

the next day because he had a family emergency and used "shushing" emojis; at 9:48 p.m. that night, he texted a Secret Service agent that he had to check on a family member in Florida; and after he arrived in Florida on June 25, he texted the same Secret Service agent that he was in Florida working.

80. Around the same time on June 24 that **NAUTA** was making his travel plans to go to Florida, **NAUTA** and **DE OLIVEIRA** contacted Trump Employee 4, who was the Director of Information Technology ("IT") at The Mar-a-Lago Club, as follows:

a. At 5:02 p.m., **NAUTA** sent text messages to Trump Employee 4 asking, "Hey bro You around this weekend."

b. At 5:05 p.m., **NAUTA** texted **DE OLIVEIRA**, asking, "Hey brother You working today?" **DE OLIVEIRA** responded, "Yes I just left." **NAUTA** then called **DE OLIVEIRA** and they spoke for approximately two minutes.

c. At 5:09 p.m., Trump Employee 4 texted a response to **NAUTA**, "I am local. Entertaining some family that came to visit. What's up?" **NAUTA** responded to Trump Employee 4, "Ok, cool. No biggie just wanted to see if you where around. Enjoy bro!"

d. At 6:56 p.m., **DE OLIVEIRA** texted Trump Employee 4, "Hey buddy how are you ... Walter call me early said it was trying to get in touch with you I guess he's coming down tomorrow I guess needs you for something." Trump Employee 4 responded, "He reached out but he didn't say what he wanted. I told him I was local but entertaining some family that came from NYC this weekend. He told me to no worries."

e. At 6:58 p.m., Trump Employee 4 texted **NAUTA**, "Bro, if you need me I can get away for a few. Just let me know." **NAUTA** responded, "Sounds good!! Thank you."

81. On Saturday, June 25, 2022, **NAUTA** traveled from Bedminster, New Jersey, to Palm Beach, Florida. Prior to **NAUTA**'s trip, **DE OLIVEIRA** told a valet at The Mar-a-Lago Club ("Trump Employee 5") that **NAUTA** was coming down. **DE OLIVEIRA** asked Trump Employee 5 not to tell anyone that **NAUTA** was coming down because **NAUTA** wanted the trip

to remain secret. **DE OLIVEIRA** also told Trump Employee 5 that **NAUTA** wanted **DE OLIVEIRA** to talk to Trump Employee 4 to see how long camera footage was stored.

82. Shortly after arriving in Palm Beach on the evening of June 25, **NAUTA** went to The Mar-a-Lago Club and met with **DE OLIVEIRA** at 5:46 p.m. At The Mar-a-Lago Club, **NAUTA** and **DE OLIVEIRA** went to the security guard booth where surveillance video is displayed on monitors, walked with a flashlight through the tunnel where the Storage Room was located, and observed and pointed out surveillance cameras.

83. On Monday, June 27, 2022, at 9:48 a.m., **DE OLIVEIRA** walked to the IT office where Trump Employee 4 was working with another employee in the IT department. **DE OLIVEIRA** requested that Trump Employee 4 step away from the office so that **DE OLIVEIRA** and Trump Employee 4 could talk.

84. At 9:49 a.m., Trump Employee 4 and **DE OLIVEIRA** left the area of the IT office together and walked through a basement tunnel. **DE OLIVEIRA** took Trump Employee 4 to a small room known as an "audio closet" near the White and Gold Ballroom. Once inside the audio closet, **DE OLIVEIRA** and Trump Employee 4 had the following exchange:

a. **DE OLIVEIRA** told Trump Employee 4 that their conversation should remain between the two of them.

b. **DE OLIVEIRA** asked Trump Employee 4 how many days the server retained footage. Trump Employee 4 responded that he believed it was approximately 45 days.

c. **DE OLIVEIRA** told Trump Employee 4 that "the boss" wanted the server deleted. Trump Employee 4 responded that he would not know how to do that, and that he did not believe that he would have the rights to do that. Trump Employee 4 told **DE OLIVEIRA** that **DE OLIVEIRA** would have to reach out to another employee who was a supervisor of security for **TRUMP**'s business organization. **DE OLIVEIRA** then insisted to **TRUMP** Employee 4 that "the boss" wanted the server deleted and asked, "what are we going to do?"

85. At 10:14 a.m., **DE OLIVEIRA** texted **NAUTA**, who was still in Florida, "Hey buddy are you working today?" **DE OLIVEIRA** then called **NAUTA** at 10:15 a.m., and they spoke for approximately one minute.

86. Later that day, at 1:06 p.m., **NAUTA** texted **DE OLIVEIRA**, who was at The Mar-a-Lago Club, "On my way to you." Between 1:31 p.m. and 1:50 p.m., **DE OLIVEIRA** walked through the bushes on the northern edge of The Mar-a-Lago Club property to meet with **NAUTA** on the adjacent property; then walked back to the IT office that he had visited that morning; and then walked again through the bushes on the northern edge of The Mar-a-Lago Club property to meet with **NAUTA** on the adjacent property.

87. At 3:55 p.m., **TRUMP** called **DE OLIVEIRA** and they spoke for approximately three and a half minutes.

The Court-Authorized Search of The Mar-a-Lago Club

88. In July 2022, the FBI and grand jury obtained and reviewed surveillance video from The Mar-a-Lago Club showing the movement of boxes set forth above.

89. August 8, 2022, the FBI executed a court-authorized search warrant at The Mar-a-Lago Club. The search warrant authorized the FBI to search for and seize, among other things, all documents with classification markings.

90. During the execution of the warrant at The Mar-a-Lago Club, the FBI seized 102 documents with classification markings in **TRUMP**'s office and the Storage Room, as follows:

Location	Number of Documents	Classification Markings
TRUMP's Office	27	Top Secret (6) Secret (18) Confidential (3)
Storage Room	75	Top Secret (11) Secret (36) Confidential (28)

91. Just over two weeks after the FBI discovered classified documents in the Storage Room and **TRUMP**'s office, on August 26, 2022, **NAUTA** called Trump Employee 5 and said words to the effect of, "someone just wants to make sure Carlos is good." In response, Trump Employee 5 told **NAUTA** that **DE OLIVEIRA** was loyal and that **DE OLIVEIRA** would not do anything to affect his relationship with **TRUMP**. That same day, at **NAUTA**'s request, Trump Employee 5 confirmed in a Signal chat group with **NAUTA** and the PAC Representative that **DE OLIVEIRA** was loyal. That same day, **TRUMP** called **DE OLIVEIRA** and told **DE OLIVEIRA** that **TRUMP** would get **DE OLIVEIRA** an attorney.

COUNTS 1-32
Willful Retention of National Defense Information
(18 U.S.C. § 793(e))

92. The General Allegations of this Superseding Indictment are re-alleged and fully incorporated here by reference.

93. On or about the dates set forth in the table below, in Palm Beach County, in the Southern District of Florida, and elsewhere, the defendant,

DONALD J. TRUMP,

having unauthorized possession of, access to, and control over documents relating to the national defense, did willfully retain the documents and fail to deliver them to the officer and employee of the United States entitled to receive them; that is—**TRUMP**, without authorization, retained at The Mar-a-Lago Club documents relating to the national defense, including the following:

Count	Date of Offense / Classification Marking / Document Description
1	January 20, 2021 – August 8, 2022
	TOP SECRET//NOFORN//SPECIAL HANDLING
	Document dated May 3, 2018, concerning White House intelligence briefing related to various foreign countries
2	January 20, 2021 – August 8, 2022
	TOP SECRET//SI//NOFORN//SPECIAL HANDLING
	Document dated May 9, 2018, concerning White House intelligence briefing related to various foreign countries
3	January 20, 2021 – August 8, 2022
	TOP SECRET//SI//NOFORN//FISA
	Undated document concerning military capabilities of a foreign country and the United States, with handwritten annotation in black marker

4	January 20, 2021 – August 8, 2022
	TOP SECRET//SPECIAL HANDLING
	Document dated May 6, 2019, concerning White House intelligence briefing related to foreign countries, including military activities and planning of foreign countries
5	January 20, 2021 – August 8, 2022
	TOP SECRET//[redacted]/[redacted]//ORCON/NOFORN
	Document dated June 2020 concerning nuclear capabilities of a foreign country
6	January 20, 2021 – August 8, 2022
	TOP SECRET//SPECIAL HANDLING
	Document dated June 4, 2020, concerning White House intelligence briefing related to various foreign countries
7	January 20, 2021 – August 8, 2022
	SECRET//NOFORN
	Document dated October 21, 2018, concerning communications with a leader of a foreign country
8	January 20, 2021 – August 8, 2022
	SECRET//REL TO USA, FVEY
	Document dated October 4, 2019, concerning military capabilities of a foreign country
9	January 20, 2021 – August 8, 2022
	TOP SECRET//[redacted]/[redacted]//ORCON/NOFORN/FISA
	Undated document concerning military attacks by a foreign country

10	January 20, 2021 – August 8, 2022
	TOP SECRET//TK//NOFORN
	Document dated November 2017 concerning military capabilities of a foreign country
11	January 20, 2021 – August 8, 2022
	No marking
	Undated document concerning military contingency planning of the United States
12	January 20, 2021 – August 8, 2022
	SECRET//REL TO USA, FVEY
	Pages of undated document concerning projected regional military capabilities of a foreign country and the United States
13	January 20, 2021 – August 8, 2022
	TOP SECRET//SI/TK//NOFORN
	Undated document concerning military capabilities of a foreign country and the United States
14	January 20, 2021 – August 8, 2022
	SECRET//ORCON/NOFORN
	Document dated January 2020 concerning military options of a foreign country and potential effects on United States interests
15	January 20, 2021 – August 8, 2022
	SECRET//ORCON/NOFORN
	Document dated February 2020 concerning policies in a foreign country

16	January 20, 2021 – August 8, 2022
	SECRET//ORCON/NOFORN
	Document dated December 2019 concerning foreign country support of terrorist acts against United States interests
17	January 20, 2021 – August 8, 2022
	TOP SECRET//[redacted]/TK//ORCON/IMCON/NOFORN
	Document dated January 2020 concerning military capabilities of a foreign country
18	January 20, 2021 – August 8, 2022
	SECRET//NOFORN
	Document dated March 2020 concerning military operations against United States forces and others
19	January 20, 2021 – August 8, 2022
	SECRET//FORMERLY RESTRICTED DATA
	Undated document concerning nuclear weaponry of the United States
20	January 20, 2021 – August 8, 2022
	TOP SECRET//[redacted]//ORCON/NOFORN
	Undated document concerning timeline and details of attack in a foreign country
21	January 20, 2021 – August 8, 2022
	SECRET//NOFORN
	Undated document concerning military capabilities of foreign countries
22	January 20, 2021 – June 3, 2022
	TOP SECRET//[redacted]//RSEN/ORCON/NOFORN
	Document dated August 2019 concerning regional military activity of a foreign country

23	January 20, 2021 – June 3, 2022
	TOP SECRET//SPECIAL HANDLING
	Document dated August 30, 2019, concerning White House intelligence briefing related to various foreign countries, with handwritten annotation in black marker
24	January 20, 2021 – June 3, 2022
	TOP SECRET//HCS-P/SI//ORCON-USGOV/NOFORN
	Undated document concerning military activity of a foreign country
25	January 20, 2021 – June 3, 2022
	TOP SECRET//HCS-P/SI//ORCON-USGOV/NOFORN
	Document dated October 24, 2019, concerning military activity of foreign countries and the United States
26	January 20, 2021 – June 3, 2022
	TOP SECRET//[redacted]//ORCON/NOFORN/FISA
	Document dated November 7, 2019, concerning military activity of foreign countries and the United States
27	January 20, 2021 – June 3, 2022
	TOP SECRET//SI/TK//NOFORN
	Document dated November 2019 concerning military activity of foreign countries
28	January 20, 2021 – June 3, 2022
	TOP SECRET//SPECIAL HANDLING
	Document dated October 18, 2019, concerning White House intelligence briefing related to various foreign countries

29	January 20, 2021 – June 3, 2022
	TOP SECRET//[redacted]/SI/TK//ORCON/NOFORN
	Document dated October 18, 2019, concerning military capabilities of a foreign country
30	January 20, 2021 – June 3, 2022
	TOP SECRET//[redacted]//ORCON/NOFORN/FISA
	Document dated October 15, 2019, concerning military activity in a foreign country
31	January 20, 2021 – June 3, 2022
	TOP SECRET//SI/TK//NOFORN
	Document dated February 2017 concerning military activity of a foreign country
32	January 20, 2021 – January 17, 2022
	TOP SECRET//NOFORN
	Presentation concerning military activity in a foreign country

All in violation of Title 18, United States Code, Section 793(e).

COUNT 33
Conspiracy to Obstruct Justice
(18 U.S.C. § 1512(k))

94. The General Allegations of this Superseding Indictment are re-alleged and fully incorporated here by reference.

The Conspiracy and its Objects

95. From on or about May 11, 2022, through in or around August 2022, in Palm Beach County, in the Southern District of Florida, and elsewhere, the defendants,

DONALD J. TRUMP,
WALTINE NAUTA, and
CARLOS DE OLIVEIRA

did knowingly combine, conspire, confederate, and agree with each other and with others known and unknown to the grand jury, to engage in misleading conduct toward another person and corruptly persuade another person to withhold a record, document, and other object from an official proceeding, in violation of 18 U.S.C. § 1512(b)(2)(A); to corruptly persuade another person, with intent to cause and induce any person to alter, destroy, mutilate, and conceal an object with intent to impair the object's integrity and availability for use in an official proceeding, in violation of 18 U.S.C. § 1512(b)(2)(B); and to corruptly alter, destroy, mutilate, and conceal a record, document, and other object from an official proceeding, in violation of 18 U.S.C. § 1512(c)(1).

The Purpose of the Conspiracy

96. The purpose of the conspiracy was for **TRUMP** to keep classified documents he had taken with him from the White House and to hide and conceal them from a federal grand jury.

The Manner and Means of the Conspiracy

97. The manner and means by which the defendants sought to accomplish the objects and purpose of the conspiracy included, among other things, the following:

a. Suggesting that Trump Attorney 1 falsely represent to the FBI and grand jury that **TRUMP** did not have documents called for by the May 11 Subpoena;

b. moving boxes of documents to conceal them from Trump Attorney 1, the FBI, and the grand jury;

c. suggesting that Trump Attorney 1 hide or destroy documents called for by the May 11 Subpoena;

d. providing to the FBI and grand jury just some of the documents called for by the May 11 Subpoena, while **TRUMP** claimed he was cooperating fully;

e. causing a false certification to be submitted to the FBI and grand jury representing that all documents with classification markings had been produced, when in fact they had not;

f. making false and misleading statements to the FBI; and

g. attempting to delete security camera footage from The Mar-a-Lago Club to conceal the footage from the FBI and grand jury.

All in violation of Title 18, United States Code, Section 1512(k).

COUNT 34
Withholding a Document or Record
(18 U.S.C. §§ 1512(b)(2)(A), 2)

98. The General Allegations of this Superseding Indictment are re-alleged and fully incorporated here by reference.

99. From on or about May 11, 2022, through in or around August 2022, in Palm Beach County, in the Southern District of Florida, and elsewhere, the defendants,

DONALD J. TRUMP and
WALTINE NAUTA,

did knowingly engage in misleading conduct toward another person, and knowingly corruptly persuade and attempt to persuade another person, with intent to cause and induce any person to withhold a record, document, and other object from an official proceeding; that is—(1) **TRUMP** attempted to persuade Trump Attorney 1 to hide and conceal documents from a federal grand jury; and (2) **TRUMP** and **NAUTA** misled Trump Attorney 1 by moving boxes that contained documents with classification markings so that Trump Attorney 1 would not find the documents and produce them to a federal grand jury.

All in violation of Title 18, United States Code, Sections 1512(b)(2)(A) and 2.

COUNT 35
Corruptly Concealing a Document or Record
(18 U.S.C. §§ 1512(c)(1), 2)

100. The General Allegations of this Superseding Indictment are re-alleged and fully incorporated here by reference.

101. From on or about May 11, 2022, through in or around August 2022, in Palm Beach County, in the Southern District of Florida, and elsewhere, the defendants,

DONALD J. TRUMP and
WALTINE NAUTA,

did corruptly conceal a record, document, and other object, and attempted to do so, with the intent to impair the object's integrity and availability for use in an official proceeding; that is—**TRUMP** and **NAUTA** hid and concealed boxes that contained documents with classification markings from Trump Attorney 1 so that Trump Attorney 1 would not find the documents and produce them to a federal grand jury.

All in violation of Title 18, United States Code, Sections 1512(c)(1) and 2.

COUNT 36
Concealing a Document in a Federal Investigation
(18 U.S.C. §§ 1519, 2)

102. The General Allegations of this Superseding Indictment are re-alleged and fully incorporated here by reference.

103. From on or about May 11, 2022, through in or around August 2022, in Palm Beach County, in the Southern District of Florida, and elsewhere, the defendants,

DONALD J. TRUMP and
WALTINE NAUTA,

did knowingly conceal, cover up, falsify, and make a false entry in any record, document, and tangible object with the intent to impede, obstruct, and influence the investigation and proper administration of any matter within the jurisdiction of a department and agency of the United States, and in relation to and contemplation of any such matter; that is—during a federal criminal investigation being conducted by the FBI, (1) **TRUMP** and **NAUTA** hid, concealed, and covered up from the FBI **TRUMP**'s continued possession of documents with classification markings at The Mar-a-Lago Club; and (2) **TRUMP** caused a false certification to be submitted to the FBI.

All in violation of Title 18, United States Code, Sections 1519 and 2.

COUNT 37
Scheme to Conceal
(18 U.S.C. §§ 1001(a)(1), 2)

104. The General Allegations of this Superseding Indictment are re-alleged and fully incorporated here by reference.

105. From on or about May 11, 2022, through in or around August 2022, in Palm Beach County, in the Southern District of Florida, and elsewhere, the defendants,

DONALD J. TRUMP and
WALTINE NAUTA,

in a matter within the jurisdiction of the judicial branch and executive branch of the United States government, did knowingly and willfully falsify, conceal, and cover up by any trick, scheme, and device a material fact; that is—during a federal grand jury investigation and a federal criminal investigation being conducted by the FBI, **TRUMP** and **NAUTA** hid and concealed from the grand jury and the FBI **TRUMP**'s continued possession of documents with classification markings.

All in violation of Title 18, United States Code, Sections 1001(a)(1) and 2.

COUNT 38
False Statements and Representations
(18 U.S.C. §§ 1001(a)(2), 2)

106. The General Allegations of this Superseding Indictment are re-alleged and fully incorporated here by reference.

107. On or about June 3, 2022, in Palm Beach County, in the Southern District of Florida, and elsewhere, the defendant,

DONALD J. TRUMP,

in a matter within the jurisdiction of the judicial branch and executive branch of the United States government, did knowingly and willfully make and cause to be made a materially false, fictitious, and fraudulent statement and representation; that is—during a federal grand jury investigation and a federal criminal investigation being conducted by the FBI, **TRUMP** caused the following false statements and representations to be made to the grand jury and the FBI in a sworn certification executed by Trump Attorney 3:

a. "A diligent search was conducted of the boxes that were moved from the White House to Florida";

b. "This search was conducted after receipt of the subpoena, in order to locate any and all documents that are responsive to the subpoena"; and

c. "Any and all responsive documents accompany this certification."

108. The statements and representations set forth above were false, as **TRUMP** knew, because **TRUMP** had directed that boxes be removed from the Storage Room before Trump Attorney 1 conducted the June 2, 2022 search for documents with classification markings, so that Trump Attorney 1's search would not and did not include all of **TRUMP**'s boxes that were removed from the White House; Trump Attorney 1's search would not and did not locate all

documents responsive to the May 11 Subpoena; and all responsive documents were not provided to the FBI and the grand jury with the certification. In fact, after June 3, 2022, more than 100 documents with classification markings remained at The Mar-a-Lago Club until the FBI search on August 8, 2022.

All in violation of Title 18, United States Code, Sections 1001(a)(2) and 2.

COUNT 39
False Statements and Representations
(18 U.S.C. § 1001(a)(2))

109. The General Allegations of this Superseding Indictment are re-alleged and fully incorporated here by reference.

110. On May 26, 2022, **NAUTA** participated in a voluntary interview with the FBI. During the interview, the FBI explained to **NAUTA** that the FBI was investigating how classified documents had been kept at The Mar-a-Lago Club, and the FBI asked **NAUTA** questions about the location and movement of **TRUMP**'s boxes before **TRUMP** provided 15 boxes to NARA on January 17, 2022. **NAUTA** was represented by counsel, and the FBI advised **NAUTA** that the interview was voluntary and that he could leave at any time. The FBI also advised **NAUTA** that it was a criminal offense to lie to the FBI. The interview was recorded.

111. On or about May 26, 2022, in Palm Beach County, in the Southern District of Florida, and elsewhere, the defendant,

WALTINE NAUTA,

in a matter within the jurisdiction of the executive branch of the United States government, did knowingly and willfully make a materially false, fictitious, and fraudulent statement and representation; that is—in a voluntary interview during a federal criminal investigation being conducted by the FBI, **NAUTA** was asked the following questions and gave the following false answers:

Question: Does any – are you aware of any boxes being brought to his home – his suite?

Answer: **No.**

* * *

Question: All right. So, so to the best of your knowledge, you're saying that those boxes that you brought onto the truck, first time you ever laid eyes on them was just the day of when [Trump Employee 2] needed you to—

Answer: **Correct.**

Question: —to take them. Okay.

* * *

Question: In knowing that we're trying to track the life of these boxes and where they could have been kept and stored and all that kind of stuff—

Answer: Mm-hm.

Question: —do you have any information that could—that would—that could help us understand, like, where they were kept, how they were kept, were they secured, were they locked? Something that makes the intelligence community feel better about these things, you know?

Answer: **I wish, I wish I could tell you. I don't know. I don't—I honestly just don't know.**

* * *

Question: And what—so, so you only saw the 15 boxes, 15, 17 boxes—

Answer: Mm-hm.

Question: —the day of the move? Even—they just showed up that day?

Answer: They were in Pine Hall. [Trump Employee 2] just asked me, hey, can we move some boxes?

Question: Okay.

Answer: And I was like, okay.

Question: So, you didn't know—had no idea how they got there before?

Answer: **No.**

112. The underscored statements and representations above were false, as **NAUTA** knew, because (1) **NAUTA** did in fact know that the boxes in Pine Hall had come from the Storage Room, as **NAUTA** himself, with the assistance of Trump Employee 2, had moved the boxes from the Storage Room to Pine Hall; and (2) **NAUTA** had observed the boxes in and moved them to various locations at The Mar-a-Lago Club.

All in violation of Title 18, United States Code, Section 1001(a)(2).

COUNT 40
Altering, Destroying, Mutilating, or Concealing an Object
(18 U.S.C. §§ 1512(b)(2)(B), 2)

113. The General Allegations of this Superseding Indictment are re-alleged and fully incorporated here by reference.

114. From on or about June 22, 2022, through in or around August 2022, in Palm Beach County, in the Southern District of Florida, and elsewhere, the defendants,

DONALD J. TRUMP,
WALTINE NAUTA, and
CARLOS DE OLIVEIRA

did knowingly corruptly persuade and attempt to persuade another person, with intent to cause and induce any person to alter, destroy, mutilate, and conceal an object with intent to impair the object's integrity and availability for use in an official proceeding; that is—**TRUMP, NAUTA,** and **DE OLIVEIRA** requested that Trump Employee 4 delete security camera footage at The Mar-a-Lago Club to prevent the footage from being provided to a federal grand jury.

All in violation of Title 18, United States Code, Sections 1512(b)(2)(B) and 2.

COUNT 41
Corruptly Altering, Destroying, Mutilating or Concealing a Document, Record, or Other Object
(18 U.S.C. §§ 1512(c)(1), 2)

115. The General Allegations of this Superseding Indictment are re-alleged and fully incorporated here by reference.

116. From on or about June 22, 2022, through in or around August 2022, in Palm Beach County, in the Southern District of Florida, and elsewhere, the defendants,

DONALD J. TRUMP,
WALTINE NAUTA, and
CARLOS DE OLIVEIRA

did corruptly alter, destroy, mutilate, and conceal a record, document and other object and attempted to do so, with the intent to impair the object's integrity and availability for use in an official proceeding; that is—**TRUMP**, **NAUTA**, and **DE OLIVEIRA** requested that Trump Employee 4 delete security camera footage at The Mar-a-Lago Club to prevent the footage from being provided to a federal grand jury.

All in violation of Title 18, United States Code, Sections 1512(c)(1) and 2.

COUNT 42
False Statements and Representations
(18 U.S.C. § 1001(a)(2))

117. The General Allegations of this Superseding Indictment are re-alleged and fully incorporated here by reference.

118. On January 13, 2023, **DE OLIVEIRA** participated in a voluntary interview with the FBI at **DE OLIVEIRA**'s residence. During the interview, the FBI explained to **DE OLIVEIRA** that the FBI was investigating how classified documents had been kept at The Mar-a-Lago Club, and the FBI asked **DE OLIVEIRA** questions about the location and movement of **TRUMP**'s boxes and other items. **DE OLIVEIRA** was advised by the FBI that the interview was voluntary and that he could tell the agents to leave at any time. The FBI also advised **DE OLIVEIRA** that it was a criminal offense to lie to the FBI. The interview was recorded.

119. On or about January 13, 2023, in Palm Beach County, in the Southern District of Florida, and elsewhere, the defendant,

CARLOS DE OLIVEIRA,

in a matter within the jurisdiction of the executive branch of the United States government, did knowingly and willfully make a materially false, fictitious, and fraudulent statement and representation; that is—in a voluntary interview during a federal criminal investigation being conducted by the FBI, **DE OLIVEIRA** was asked the following questions and gave the following false answers:

Question: When -- after the end of the presidency, boxes arrived to Mar-a-Lago. Were you part of any group to help --

Answer: **No**.

Question: -- unload them and move them?

Answer: **No.**

* * *

Question: Do you -- were you -- do you even know, like, or were you even there or aware that boxes were --

Answer: **No.**

Question: -- like, all this stuff was being moved in?

Answer: **Never saw anything.**

Question: Okay.

Answer: Yeah. And then --

Question: Even his personal stuff, like, his clothes --

Answer: **Never.**

Question: -- and furniture, nothing?

Answer: **Never saw nothing.**

Question: Okay. So you don't know where items would have been stored, as soon as he moved back to Mar-a-Lago?

Answer: **No.**

120. The underscored statements and representations above were false, as **DE OLIVEIRA** knew, because **DE OLIVEIRA** had personally observed and helped move **TRUMP**'s boxes when they arrived at The Mar-a-Lago Club in January 2021.

All in violation of Title 18, United States Code, Section 1001(a)(2).

A TRUE BILL

[redacted]

FOREPERSON

JACK SMITH
SPECIAL COUNSEL
UNITED STATES DEPARTMENT OF JUSTICE

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

UNITED STATES OF AMERICA

CASE NO.: 23-CR-80101-AMC(s)

v.
Donald J. Trump,
Waltine Nauta, and
Carlos De Oliveira,
Defendants.

CERTIFICATE OF TRIAL ATTORNEY

Court Division (select one)
☐ Miami ☐ Key West ☐ FTP
☐ FTL ☒ WPB

Superseding Case Information:
New Defendant(s) (Yes or No) Yes
Number of New Defendants 1
Total number of counts 42

I do hereby certify that:

1. I have carefully considered the allegations of the indictment, the number of defendants, the number of probable witnesses and the legal complexities of the Indictment/Information attached hereto.
2. I am aware that the information supplied on this statement will be relied upon by the Judges of this Court in setting their calendars and scheduling criminal trials under the mandate of the Speedy Trial Act, Title 28 U.S.C. §3161.
3. Interpreter: (Yes or No) No
   List language and/or dialect: _____
4. This case will take 21 days for the parties to try.
5. Please check appropriate category and type of offense listed below:

(Check only one)		(Check only one)
I	☐ 0 to 5 days	☐ Petty
II	☐ 6 to 10 days	☐ Minor
III	☐ 11 to 20 days	☐ Misdemeanor
IV	☒ 21 to 60 days	☒ Felony
V	☐ 61 days and over	

6. Has this case been previously filed in this District Court? (Yes or No) Yes
   If yes, Judge Cannon Case No. 23-cr-80101
7. Has a complaint been filed in this matter? (Yes or No) No
   If yes, Magistrate Case No. _____
8. Does this case relate to a previously filed matter in this District Court? (Yes or No) No
   If yes, Judge _____ Case No. _____
9. Defendant(s) in federal custody as of N/A
10. Defendant(s) in state custody as of _____
11. Rule 20 from the _____ District of _____
12. Is this a potential death penalty case? (Yes or No) No
13. Does this case originate from a matter pending in the Northern Region of the U.S. Attorney's Office prior to August 8, 2014 (Mag. Judge Shaniek Maynard? (Yes or No) No
14. Does this case originate from a matter pending in the Central Region of the U.S. Attorney's Office prior to October 3, 2019 (Mag. Judge Jared Strauss? (Yes or No) No
15. Did this matter involve the participation of or consultation with now Magistrate Judge Eduardo I. Sanchez during his tenure at the U.S. Attorney's Office, which concluded on January 22, 2023? No

By: _____
JAY I. BRATT
Counselor to the Special Counsel
Court ID No. A5502946

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: Donald J. Trump

Case No: 23-CR-80101-AMC(s)

Counts #: 1-32

Willful Retention of National Defense Information, 18 U.S.C. § 793(e)

*** Max. Term of Imprisonment: 10 years**
*** Mandatory Min. Term of Imprisonment (if applicable): N/A**
*** Max. Supervised Release: 3 years**
*** Max. Fine: $250,000**

Count #: 33

Conspiracy to Obstruct Justice, 18 U.S.C. § 1512(k)

*** Max. Term of Imprisonment: 20 years**
*** Mandatory Min. Term of Imprisonment (if applicable): N/A**
*** Max. Supervised Release: 3 years**
*** Max. Fine: $250,000**

Count #: 34

Withholding a Document or Record, 18 U.S.C. §§ 1512(b)(2)(A), 2

*** Max. Term of Imprisonment: 20 years**
*** Mandatory Min. Term of Imprisonment (if applicable): N/A**
*** Max. Supervised Release: 3 years**
*** Max. Fine: $250,000**

***Refers only to possible term of incarceration, supervised release and fines. It does not include restitution, special assessments, parole terms, or forfeitures that may be applicable.**

Count #: 35

Corruptly Concealing a Document or Record, 18 U.S.C. §§ 1512(c)(1), 2

*** Max. Term of Imprisonment: 20 years**
*** Mandatory Min. Term of Imprisonment (if applicable): N/A**
*** Max. Supervised Release: 3 years**
*** Max. Fine: $250,000**

Count #: 36

Concealing a Document in a Federal Investigation, 18 U.S.C. §§ 1519, 2

*** Max. Term of Imprisonment: 20 years**
*** Mandatory Min. Term of Imprisonment (if applicable): N/A**
*** Max. Supervised Release: 3 years**
*** Max. Fine: $250,000**

Count #: 37

Scheme to Conceal, 18 U.S.C. §§ 1001(a)(1), 2

*** Max. Term of Imprisonment: 5 years**
*** Mandatory Min. Term of Imprisonment (if applicable): N/A**
*** Max. Supervised Release: 3 years**
*** Max. Fine: $250,000**

Count #: 38

False Statements and Representations, 18 U.S.C. §§ 1001(a)(2), 2

*** Max. Term of Imprisonment: 5 years**
*** Mandatory Min. Term of Imprisonment (if applicable): N/A**
*** Max. Supervised Release: 3 years**
*** Max. Fine: $250,000**

***Refers only to possible term of incarceration, supervised release and fines. It does not include restitution, special assessments, parole terms, or forfeitures that may be applicable.**

Count #: 40

Altering, Destroying, Mutilating, or Concealing an Object, 18 U.S.C. §§ 1512(b)(2)(B), 2

*** Max. Term of Imprisonment: 20 years**
*** Mandatory Min. Term of Imprisonment (if applicable): N/A**
*** Max. Supervised Release: 3 years**
*** Max. Fine: $250,000**

Count #: 41

Corruptly Altering, Destroying, Mutilating, or Concealing a Document, Record, or Other Object, 18 U.S.C. §§ 1512(c)(1), 2

*** Max. Term of Imprisonment: 20 years**
*** Mandatory Min. Term of Imprisonment (if applicable): N/A**
*** Max. Supervised Release: 3 years**
*** Max. Fine: $250,000**

***Refers only to possible term of incarceration, supervised release and fines. It does not include restitution, special assessments, parole terms, or forfeitures that may be applicable.**

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: Waltine Nauta

Case No: 23-CR-80101-AMC(s)

Count #: 33

Conspiracy to Obstruct Justice, 18 U.S.C. § 1512(k)

*** Max. Term of Imprisonment: 20 years**
*** Mandatory Min. Term of Imprisonment (if applicable): N/A**
*** Max. Supervised Release: 3 years**
*** Max. Fine: $250,000**

Count #: 34

Withholding a Document or Record, 18 U.S.C. §§ 1512(b)(2)(A), 2

*** Max. Term of Imprisonment: 20 years**
*** Mandatory Min. Term of Imprisonment (if applicable): N/A**
*** Max. Supervised Release: 3 years**
*** Max. Fine: $250,000**

Count #: 35

Corruptly Concealing a Document or Record, 18 U.S.C. §§ 1512(c)(1), 2

*** Max. Term of Imprisonment: 20 years**
*** Mandatory Min. Term of Imprisonment (if applicable): N/A**
*** Max. Supervised Release: 3 years**
*** Max. Fine: $250,000**

Count #: 36

Concealing a Document in a Federal Investigation, 18 U.S.C. §§ 1519, 2

*** Max. Term of Imprisonment: 20 years**
*** Mandatory Min. Term of Imprisonment (if applicable): N/A**
*** Max. Supervised Release: 3 years**
*** Max. Fine: $250,000**

***Refers only to possible term of incarceration, supervised release and fines. It does not include restitution, special assessments, parole terms, or forfeitures that may be applicable.**

Count #: 37

Scheme to Conceal, 18 U.S.C. §§ 1001(a)(1), 2

*** Max. Term of Imprisonment: 5 years**
*** Mandatory Min. Term of Imprisonment (if applicable): N/A**
*** Max. Supervised Release: 3 years**
*** Max. Fine: $250,000**

Count #: 39

False Statements and Representations, 18 U.S.C. § 1001(a)(2)

*** Max. Term of Imprisonment: 5 years**
*** Mandatory Min. Term of Imprisonment (if applicable): N/A**
*** Max. Supervised Release: 3 years**
*** Max. Fine: $250,000**

Count #: 40

Altering, Destroying, Mutilating, or Concealing an Object, 18 U.S.C. §§ 1512(b)(2)(B), 2

*** Max. Term of Imprisonment: 20 years**
*** Mandatory Min. Term of Imprisonment (if applicable): N/A**
*** Max. Supervised Release: 3 years**
*** Max. Fine: $250,000**

Count #: 41

Corruptly Altering, Destroying, Mutilating, or Concealing a Document, Record, or Other Object, 18 U.S.C. §§ 1512(c)(1), 2

*** Max. Term of Imprisonment: 20 years**
*** Mandatory Min. Term of Imprisonment (if applicable): N/A**
*** Max. Supervised Release: 3 years**
*** Max. Fine: $250,000**

***Refers only to possible term of incarceration, supervised release and fines. It does not include restitution, special assessments, parole terms, or forfeitures that may be applicable.**

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: Carlos De Oliveira

Case No: 23-CR-80101-AMC(s)

Count #: 33

Conspiracy to Obstruct Justice, 18 U.S.C. § 1512(k)

*** Max. Term of Imprisonment: 20 years**
*** Mandatory Min. Term of Imprisonment (if applicable): N/A**
*** Max. Supervised Release: 3 years**
*** Max. Fine: $250,000**

Count #: 40

Altering, Destroying, Mutilating, or Concealing an Object, 18 U.S.C. §§ 1512(b)(2)(B), 2

*** Max. Term of Imprisonment: 20 years**
*** Mandatory Min. Term of Imprisonment (if applicable): N/A**
*** Max. Supervised Release: 3 years**
*** Max. Fine: $250,000**

Count #: 41

Corruptly Altering, Destroying, Mutilating, or Concealing a Document, Record, or Other Object, 18 U.S.C. §§ 1512(c)(1), 2

*** Max. Term of Imprisonment: 20 years**
*** Mandatory Min. Term of Imprisonment (if applicable): N/A**
*** Max. Supervised Release: 3 years**
*** Max. Fine: $250,000**

Count #: 42

False Statements and Representations, 18 U.S.C. § 1001(a)(2)

*** Max. Term of Imprisonment: 5 years**
*** Mandatory Min. Term of Imprisonment (if applicable): N/A**
*** Max. Supervised Release: 3 years**
*** Max. Fine: $250,000**

***Refers only to possible term of incarceration, supervised release and fines. It does not include restitution, special assessments, parole terms, or forfeitures that may be applicable.**