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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
WEST PALM BEACH DIVISION

CASE NO. 22-CV-81294-CANNON

DONALD J. TRUMP,

Plaintiff,

v.

UNDER SEAL AND EX PARTE

UNITED STATES OF AMERICA,

Defendant.

_____ /

NOTICE BY INVESTIGATIVE TEAM OF STATUS OF REVIEW

In its order of August 27, 2022, the Court ordered the undersigned to provide a “particularized notice indicating the status of [the government’s] review of the seized property.” D.E. 29 (the “Preliminary Order”) at 2, Section 3.b.ii. This submission represents the investigative team’s notice.¹ A separate notice will be filed by the “filter” team.

As of the date of this filing, the investigative team has completed a preliminary review of the materials seized pursuant to the search warrant executed on August 8, 2022, with the exception of any potentially attorney-client privileged materials that, pursuant to the filter protocols set forth in the search warrant affidavit, have not been provided to the investigative team. The documents bearing classification markings that were seized during the execution of the search warrant have been segregated from the remainder of the seized materials and

¹ The Preliminary Order indicated that this notice should be filed under seal. In an abundance of caution, the government is filing this Notice under seal and *ex parte* since it contains the type of information that, in the normal course, would not be shared with the owner of a premises that was searched pursuant to a court-authorized criminal search warrant.

are being separately stored in accordance with the appropriate procedures governing the security of classified material.

The investigative team has reviewed the seized materials in furtherance of its ongoing investigation, evaluating the relevance and character of each item seized, and making preliminary determinations about investigative avenues suggested or warranted by the character and nature of the seized items. The seized materials will continue to be used to further the government's investigation, and the investigative team will continue to use and evaluate the seized materials as it takes further investigative steps, such as through additional witness interviews and grand jury practice. Additionally, all evidence pertaining to the seized items—including, but not limited to, the nature and manner in which they were stored, as well as any evidence with respect to particular documents or items of interest—will inform the government's investigation. Thus, it is important to note, "review" of the seized materials is not a single investigative step but an ongoing process in this active criminal investigation. That said, the government can confirm for the Court that the investigative team has already examined every item seized (other than materials that remain subject to the filter protocols), even as its investigation and further review continues. The investigative team has been and will be continually mindful of the potential for attorney-client privilege issues and the filter protocols contained in the search warrant.

Additionally, as the government has separately explained in its Notice of Receipt of Preliminary Order and Attorney Appearance, D.E. 31, the Department of Justice and the Office of the Director of National Intelligence ("ODNI") are facilitating a classification review of materials recovered pursuant to the search warrant, and ODNI is leading an intelligence community assessment of the potential risk to national security that would result

from disclosure of the seized materials.

As directed by the Court's Preliminary Order, the government has attached a more detailed property receipt as Exhibit A hereto.

Respectfully submitted,

/s Juan Antonio Gonzalez

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Exhibit A

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
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CASE NO. 22-CV-81294-CANNON

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DETAILED PROPERTY INVENTORY
PURSUANT TO COURT'S PRELIMINARY ORDER

Item #1 – Documents from Office
1 US Government Document with SECRET Classification Markings
2 US Government Documents/Photographs without Classification Markings

Item #2 – Box/Container from Office
99 Magazines/Newspapers/Press Articles and Other Printed Media dated between 01/2017-10/2018
2 US Government Documents with CONFIDENTIAL Classification Markings
15 US Government Documents with SECRET Classification Markings
7 US Government Documents with TOP SECRET Classification Markings
69 US Government Documents/Photographs without Classification Markings
43 Empty Folders with "CLASSIFIED" Banners
28 Empty Folders Labeled "Return to Staff Secretary/Military Aide"

Item #3 – Documents from Office
2 US Government Documents/Photographs without Classification Markings

Item #4 – Documents from Office

26 Magazines/Newspapers/Press Articles and Other Printed Media dated between 01/2020-11/2020
1 US Government Document with CONFIDENTIAL Classification Markings
1 US Government Documents with SECRET Classification Markings
357 US Government Documents/Photographs without Classification Markings

Item #5 – Documents from Office
396 US Government Documents/Photographs without Classification Markings

Item #6 – Documents from Office
640 US Government Documents/Photographs without Classification Markings

Item #7 – Documents from Office
1 US Government Document/Photograph without Classification Markings

Item #8 – Box/Container from Storage Room
68 Magazines/Newspapers/Press Articles and Other Printed Media dated between 10/2015-05/2017
1 Article of Clothing/Gift Item
1 Book
2 US Government Documents/Photographs without Classification Markings

Item #9 – Box/Container from Storage Room
91 Magazines/Newspapers/Press Articles and Other Printed Media dated between 01/2019-09/2020
1 Article of Clothing/Gift Item
65 US Government Documents/Photographs without Classification Markings

Item #10 – Box/Container from Storage Room
30 Magazines/Newspapers/Press Articles and Other Printed Media dated between 10/2008-12/2019
11 US Government Documents with CONFIDENTIAL Classification Markings
21 US Government Documents with SECRET Classification Markings

3 Articles of Clothing/Gift Items
1 Book
255 US Government Documents/Photographs without Classification Markings

Item #11 – Box/Container from Storage Room
116 Magazines/Newspapers/Press Articles and Other Printed Media dated between 06/2019-08/2020
8 US Government Documents with CONFIDENTIAL Classification Markings
1 US Government Document with SECRET Classification Markings
2 US Government Document with TOP SECRET Classification Markings
104 US Government Documents/Photographs without Classification Markings

Item #12 – Box/Container from Storage Room
39 Magazines/Newspapers/Press Articles and Other Printed Media dated between 01/2017-03/2020
71 US Government Documents/Photographs without Classification Markings

Item #13 – Box/Container from Storage Room
62 Magazines/Newspapers/Press Articles and Other Printed Media dated between 09/2018 -08/2019
2 US Government Documents with CONFIDENTIAL Classification Markings
1 US Government Document with TOP SECRET Classification Markings
1 Article of Clothing/Gift Items
708 US Government Documents/Photographs without Classification Markings

Item #14 – Box/Container from Storage Room
87 Magazines/Newspapers/Press Articles and Other Printed Media dated between 01/2018-11/2019
2 US Government Documents with CONFIDENTIAL Classification Markings
438 US Government Documents/Photographs without Classification Markings

Item #15 – Box/Container from Storage Room
65 Magazines/Newspapers/Press Articles and Other Printed Media dated between 10/2016-11/2018

1 US Government Documents with CONFIDENTIAL Classification Markings
4 US Government Document with SECRET Classification Markings
2 Books
78 US Government Documents/Photographs without Classification Markings
2 Empty Folders with "CLASSIFIED" Banners
2 Empty Folders Labeled "Return to Staff Secretary/Military Aide"

Item #16 – Box/Container from Storage Room
76 Magazines/Newspapers/Press Articles and Other Printed Media dated between 11/2017-12/2017
60 US Government Documents/Photographs without Classification Markings

Item #17 – Box/Container from Storage Room
67 Magazines/Newspapers/Press Articles and Other Printed Media dated between 7/2016 – 3/2017
5 Articles of Clothing/Gift Items
2 US Government Documents/Photographs without Classification Markings

Item #18 – Box/Container from Storage Room
4 Magazines/Newspapers/Press Articles and Other Printed Media dated between 01/2018 – 12/2019
1 US Government Document with SECRET Classification Markings
1 Book
1571 US Government Documents/Photographs without Classification Markings
2 Empty Folders Labeled "Return to Staff Secretary/Military Aide"

Item #19 – Box/Container from Storage Room
53 Magazines/Newspapers/Press Articles and Other Printed Media dated between 05/2016 – 01/2020
1 US Government Documents with CONFIDENTIAL Classification Markings
5 Articles of Clothing/Gift Items
236 US Government Documents/Photographs without Classification Markings

Item #20 – Box/Container from Storage Room
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121 Magazines/Newspapers/Press Articles and Other Printed Media dated between 08/2017-12/2017
16 US Government Documents/Photographs without Classification Markings

Item #21 – Box/Container from Storage Room
2 Magazines/Newspapers/Press Articles and Other Printed Media dated 11/2020
1406 US Government Documents/Photographs without Classification Markings

Item #22 – Box/Container from Storage Room
109 Magazines/Newspapers/Press Articles and Other Printed Media dated between 06/2020 – 10/2020
29 US Government Documents/Photographs without Classification Markings

Item #23 – Box/Container from Storage Room
67 Magazines/Newspapers/Press Articles and Other Printed Media dated between 11/2016 – 06/2018
1 US Government Document with SECRET Classification Markings
1 Book
70 US Government Documents/Photographs without Classification Markings
8 Empty Folders Labeled “Return to Staff Secretary/Military Aide”

Item #24 – Box/Container from Storage Room
1 Magazines/Newspapers/Press Articles and Other Printed Media dated circa 2018
1603 US Government Documents/Photographs without Classification Markings

Item #25 – Box/Container from Storage Room
76 Magazines/Newspapers/Press Articles and Other Printed Media dated between 10/2016 – 11/2017
1 US Government Documents with CONFIDENTIAL Classification Markings
1 US Government Document with SECRET Classification Markings
20 US Government Documents/Photographs without Classification Markings
1 Empty Folder with “CLASSIFIED” Banner

Item #26 – Box/Container from Storage Room
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8 Magazines/Newspapers/Press Articles and Other Printed Media dated between 12/2017 – 3/2020
3 US Government Document with TOP SECRET Classification Markings
1 Article of Clothing/Gift Items
1 Book
1841 US Government Documents/Photographs without Classification Markings

Item #27– Box/Container from Storage Room
1 Magazines/Newspapers/Press Articles and Other Printed Media dated between 07/2016 – 9/2020
1 Article of Clothing/Gift Items
23 Books
52 US Government Documents/Photographs without Classification Markings

Item #28 – Box/Container from Storage Room
2 Magazines/Newspapers/Press Articles and Other Printed Media dated between 2/2017 – 3/2017
2 US Government Documents with CONFIDENTIAL Classification Markings
8 US Government Document with SECRET Classification Markings
4 US Government Document with TOP SECRET Classification Markings
1 Article of Clothing/Gift Items
1 Book
795 US Government Documents/Photographs without Classification Markings

Item #29 – Box/Container from Storage Room
86 Magazines/Newspapers/Press Articles and Other Printed Media dated between 10/1995 – 05/2019
1 US Government Document with TOP SECRET Classification Markings
35 US Government Documents/Photographs without Classification Markings

Item #30 – Box/Container from Storage Room
29 Magazines/Newspapers/Press Articles and Other Printed Media dated between 05/2020 – 09/2020
82 US Government Documents/Photographs without Classification Markings

Item # 31– Box/Container from Storage Room
111 Magazines/Newspapers/Press Articles and Other Printed Media dated between 06/2015 – 04/2019
41 US Government Documents/Photographs without Classification Markings

Item #32 – Box/Container from Storage Room
94 Magazines/Newspapers/Press Articles and Other Printed Media dated between 02/2008 – 04/2020
1 Book
88 US Government Documents/Photographs without Classification Markings

Item #33 – Box/Container from Storage Room
83 Magazines/Newspapers/Press Articles and Other Printed Media dated between 02/2017 – 02/2018
1 Book
44 US Government Documents/Photographs without Classification Markings
2 Empty Folders with “CLASSIFIED” Banners
2 Empty Folders Labeled “Return to Staff Secretary/Military Aide”