

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

CASE NO. 22-CV-81294-CANNON

DONALD J. TRUMP,

Plaintiff,

v.

UNITED STATES OF AMERICA,

Defendant.

AFFIDAVIT REGARDING DETAILED INVENTORY

I, [REDACTED], hereby declare the following:

1. I am a Supervisory Special Agent with the Federal Bureau of Investigation (“FBI”), United States Department of Justice (“DOJ”), currently assigned to the Counterintelligence Division of the FBI’s Washington Field Office. As a Supervisory Special Agent, I lead a squad of FBI Special Agents, Intelligence Analysts, and other support personnel in conducting counterintelligence and espionage investigations, including investigations concerning the mishandling of classified or national defense information.

2. I make this declaration in response to the Special Master’s Case Management Plan, filed September 22, 2022, which directed a “government official with sufficient knowledge of the matter [to] submit a declaration or affidavit as to whether the Detailed Property Inventory, ECF 39-1, represents the full and accurate extent of the property seized from the premises located at 1100 S. Ocean Boulevard, Palm Beach, Florida 33480 (the

‘Premises’) on August 8, 2022, excluding documents bearing classification markings (the ‘Seized Materials’).” Case Management Plan at 1 ¶ I.¹

3. The squad that I supervise had primary responsibility for the execution of a search warrant at the Premises on August 8, 2022. I was present during the execution of that search warrant, which resulted in the seizure of thirty-three boxes, containers, or other items of evidence, which contained just over one hundred records with classification markings, including records marked TOP SECRET and records marked as containing additional sensitive compartmented information.

4. Since the execution of the search, the Seized Materials have remained in the custody of the FBI and have been maintained pursuant to FBI procedures governing the secure storage of evidence and chain of custody.

5. Following the execution of the search, I and FBI personnel working under my direction began to review the Seized Materials as part of our investigation. Pursuant to the Court’s Preliminary Order, D.E. 29 at 2, Section 3.b.i, I and FBI personnel working under my direction reviewed all of the Seized Materials in order to draft the Detailed Property Inventory, which was filed as D.E. 39-1.

6. In order to ensure that the Detailed Property Inventory was accurate, I and FBI personnel working under my direction conducted an additional review and recount of the Seized Materials in order to make this declaration. That additional review and recount

¹ As the Special Master and the Court are aware, the search warrant executed at the Premises on August 8, 2022, set forth filter procedures concerning potentially privileged material. The materials addressed in this declaration do not include the materials filtered and segregated by the Privilege Review Team that remain in the Privilege Review Team’s possession.

resulted in some minor revisions to the Detailed Property Inventory.² A Revised Detailed Property Inventory is attached hereto.

7. Based on my personal awareness and knowledge of the facts of this matter, as well as my review of FBI records and conversations with those working at my direction in this investigation, the Revised Detailed Property Inventory attached hereto represents the full and accurate extent of the property seized from the Premises on August 8, 2022. I am not aware of any documents or materials seized from the Premises on that date by the FBI that are not reflected in the Revised Detailed Property Inventory, other than materials that the Privilege Review Team has not provided to the Case Team, as described in footnote 1 above.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on September 26th, 2022.



Supervisory Special Agent
Federal Bureau of Investigation

² The Case Management Plan's requirement that I provide this declaration afforded the FBI more time to conduct this additional review and recount than had the Preliminary Order, which required the Detailed Property Inventory to be completed in a single business day.

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**REVISED 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
74 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
361 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
671 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
257 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
110 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
52 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
710 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
1578 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
1413 US Government Documents/Photographs without Classification Markings

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

Item #23 – Box/Container from Storage Room
68 Magazines/Newspapers/Press Articles and Other Printed Media dated between 11/2016 – 06/2018
1 US Government Document with SECRET Classification Markings
1 Book
69 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
1599 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
1844 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
793 US Government Documents/Photographs without Classification Markings

Item #29 – Box/Container from Storage Room
84 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
98 Magazines/Newspapers/Press Articles and Other Printed Media dated between 02/2008 – 04/2020
1 Book
87 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 Labeled “Return to Staff Secretary/Military Aide”