

# EXHIBIT A



**TODD BLANCHE**  
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October 6, 2023

Via Email  
Molley Gaston  
Thomas Windom  
Senior Assistant Special Counsels  
950 Pennsylvania Avenue NW  
Room B-206  
Washington, D.C. 20530

**Re: United States v. Donald J. Trump, No. 23 Cr. 257 (TSC)**

Dear Ms. Gaston and Mr. Windom:

We write on behalf of President Trump, pursuant to Rule 16, *Brady*, and *Giglio*, with questions regarding “Document 1” and “Document 5” from your September 26, 2023 production. Our review of your productions is ongoing. We expect to submit additional questions and requests on a rolling basis, including, for example, relating to the issues we raised in our October 5, 2023 reply submission. (Dkt. No. 76).

1. We agree with your suggestion that the unclassified portions of Document 1 must be produced in unclassified discovery, particularly in light of the fact that Mr. Lauro and Mr. Singer have not been granted security clearances at this time. (*See* Dkt. No. 65 at 5 n.1). Please let us know when you will make those unclassified materials available to us.

2. We seek additional information regarding the restricted-handling procedures and the redactions to “Document 5” from the September 26 production.

Regarding handling, consistent with your production letter, we have only been granted read-and-return access to Document 5. The CISO is requiring that any notes relating to the substance of Document 5 be handled in the same fashion, and we have not been provided with access to a laptop that is cleared for the preparation of submissions to you or the Court regarding the substance of Document 5. These restrictions are hindering our ability to prepare discovery correspondence and motions, and to conduct necessary defense investigation. Relatedly, we do not believe that the Court and its staff currently have access to a facility where Document 5 can be reviewed and discussed, or devices that could be used to compose orders and opinions regarding the substance of Document 5. The restrictions will therefore hinder the Court’s ability to address any disputes we have over Document 5. In light of the expedited case schedule that you have insisted on pursuing, please explain why these restrictions are necessary.

Regarding redactions, we seek additional information regarding the basis for withholding the redacted information and the procedure used to do so. We understand that the redactions were requested by one or more of the agencies with equities in Document 5, and that the redactions were

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authorized unilaterally by the Special Counsel's Office. In the Southern District of Florida, the Office has indicated that it will rely on CIPA § 4 to seek court approval to redact information from classified documents produced in discovery. (SDFL Dkt. No. 165 at 4). We believe that is the necessary and appropriate procedure, including with respect to Document 5 in this case.

At the risk of stating the obvious, we believe the redactions to Document 5 are inconsistent with your discovery obligations. Please identify and confirm the individuals and entities that requested the redactions, the individual at the Special Counsel's Office who authorized the redactions, and the legal basis relied upon to apply the redactions, which are hindering our review of discovery and causing ongoing prejudice to President Trump.

Please let us know if you would like to discuss any of these issues.

Respectfully Submitted,

/s/ Todd Blanche

Todd Blanche

Emil Bove

Stephen Weiss

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*Attorneys for Donald J. Trump*

# **EXHIBIT B**

(Redacted)

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October 23, 2023

**Via Email:** MGG@usdoj.gov; TPW@usdoj.gov

Molly Gaston  
Thomas P. Windom  
Senior Assistant Special Counsels  
950 Pennsylvania Avenue NW  
Room B-206  
Washington, D.C. 20530

**Re: United States v. Donald J. Trump, No. 23 Cr. 257 (TSC)**

Dear Ms. Gaston and Mr. Windom:

We write on behalf of President Trump, to request that your office produce the following discovery pursuant to Rule 16(a)(1)(E), *Brady v. Maryland*, 373 U.S. 83 (1963), *United States v. Agurs*, 427 U.S. 97 (1976), *Giglio v. United States*, 405 U.S. 150 (1972) and their progeny; and the Fifth and Sixth Amendments to the United States Constitution. Simply pointing to the voluminous discovery produced as satisfaction of your constitutional obligations is not sufficient. In furtherance of your offer “to exceed [your] discovery obligations” and “provide substantial assistance to aid the Defendant’s review” (doc. 23 at 4), we request that you specifically search for and produce discovery responsive to the following discrete requests.

**I. Background**

Each of the Requests set forth below calls for production of documents irrespective of their classification level. As used herein, the term “documents” includes (i) all communications, including memoranda, reports, letters, notes, emails, text messages, and other electronic communications; (ii) hard copies and electronically stored information, whether written, printed, or typed; and (iii) all drafts and copies.

As used herein, the term “foreign influence” is broader than the definition of the term “foreign interference” in Executive Order 13848 and includes any overt or covert effort by foreign governments and non-state actors, as well as agents and associates of foreign governments and non-state actors, intended to affect directly or indirectly a US person or policy or process of any federal, state, or local government actor or agency in the United States.

The Requests call for specified documents in the possession of the prosecution team, as we defined that term in our October 15, 2023 letter to you.

## **II. Requests**

1. Please provide all documents regarding informants, cooperators, undercover agents, representatives, or anyone acting in a similar capacity on behalf of or at the behest of the Department of Justice or any law enforcement agency (including state or District of Columbia) who was present at or within five miles of the United States Capitol on January 6, 2021.

2. Please provide all documents regarding informants, cooperators, undercover agents, representatives, or anyone acting in a similar capacity on behalf of or at the behest of the Department of Justice or any law enforcement agency (including state or District of Columbia) who were involved in the assistance, planning, or encouragement of any activities related to the protest, breach, or trespassing of the United States Capitol on January 6, 2021.

3. Please identify all consideration or things of value given to or on behalf of each person present at or involved in any activities related to the protest, breach, or trespassing of the United States Capitol on January 6, 2021.

4. Please provide all documents regarding requests for security, National Guard, or any law enforcement presence related to the Ellipse rally or any other protest or demonstration within Washington D.C. on January 6, 2021.

5. Please provide all documents regarding the use of alternate electors in prior elections, including documents regarding any investigations relating to alternate electors.

6. Please provide all documents regarding State Legislature involvement, approval, or acquiescence to alternate electors in any election.

7. Please provide all legal opinions considered by State Legislatures regarding alternate electors in any election.

8. Please provide all documents relating to investigations relating to fraud, interference (including but not limited to foreign interference), or irregularities during the 2020 election, including but not limited to documents relating to:

a. The issues alleged in paragraphs 12(a) – 12(f) of the Indictment;

b. [REDACTED]

c. [REDACTED]

d. [REDACTED]

e. [REDACTED]

f. [REDACTED]

g. [REDACTED]

h. [REDACTED]

i. Documents related to the investigation of voting anomalies or irregularities in the 2020 election, including, but not limited to, the total number of votes exceeding past elections either nationally or in particular states or localities, the total votes exceeding support for one candidate compared to past elections, significant or late shifts in voting totals toward one candidate, signature verification, ballots sent out without requests, ballot harvesting, and any other quantitative or qualitative anomalies or irregularities in the 2020 election compared to past elections.

j. Documents provided to President Trump and/or his advisors between November 3, 2020, and January 6, 2021, suggesting fraud, irregularities, or anomalies in any State election.

k. Documents regarding changes or amendments to State election statutes, rules, guidelines, or policies prior to or after the 2020 election, including any documents reflecting analysis, views, positions, or opinions by personnel from DOJ or the Special Counsel's Office regarding the propriety or legislative approval for such changes or amendments.

l. Documents regarding activities or responses by State Legislatures following the 2020 election to investigate or address voting anomalies or irregularities, including changes or amendments to State election statutes, rules, guidelines, or policies.

9. Please provide all documents relating to assessments of potential fraud, interference, or irregularities during the 2020 election.

10. Please provide all documents relating to complaints or concerns by any prosecutor from DOJ, the Special Counsel's Office, or any federal law enforcement agent relating to the conduct of the investigations of President Trump, the 2020 election, or President Biden.

11. Please provide all documents related to views and opinions expressed by Department of Justice personnel, including from the Public Integrity Section and National Security Division, discouraging, disagreeing with, or resisting investigations of election fraud, interference (including foreign interference), anomalies, or irregularities related to the 2020 election.

12. Please provide all documents related to or reflecting decisions by the Department of Justice, federal law enforcement, state law enforcement, election officials, or other government officials declining or refusing a review or investigation of election fraud, interference (including foreign interference), anomalies, or irregularities related to the 2020 election.

13. Please provide all documents that the Special Counsel's Office will rely upon at trial to argue that there was no fraud in the 2020 election.

14. Please provide all documents indicating the acceptance of non-outcome determinative fraud within federal or state government elections.

15. Please provide all documents defining "outcome determinative fraud."

16. Please provide all documents authored or reviewed by attorneys that support the legality of any action alleged in the Indictment.

17. Please provide all audits of election results, vote tabulation, vote submission, or related election activities performed by State governments named in the Indictment.

18. Please provide all statutes, rules, or policies regarding election audit procedures of the States named in the Indictment.

19. Please provide all documents regarding any assessments of the opportunity or lack of opportunity for fraud or foreign interference in the 2020 election.

20. Please provide all documents regarding State Legislature disagreement with any court decisions regarding the 2020 election.

21. Please provide all documents regarding audits, checks, inspections, or reviews to ensure the integrity of mail-in ballots and their compliance with state laws and regulations.

22. Please provide all documents regarding the compromise, diminishment, or lowering of the standards for mail-in ballots and their compliance with state laws and regulations related to the 2020 election.

23. Please provide all documents reflecting legal opinions relating to mail-in ballots.

24. Please provide all documents, including communications, memorandums, and opinions (whether formal written opinions, drafts thereto, or informal analyses), of the Department of Justice Office of Legal Counsel concerning the Electoral Count Act, election fraud, any litigation related to the 2020 election, or any advice provided directly or indirectly to any Executive Branch official concerning the outcome of the 2020 election.

25. Please identify all Capitol Police Officers present at the Capitol on January 6, 2021, and provide all interview notes (including rough notes), statements, recordings, or memoranda of those Capitol Police Officers. If any interviews were not memorialized, please explain why that was not done.

26. [REDACTED]

27. All exhibits, including audio, software, or video files, referenced during any grand jury testimony or presentation.

28. Please provide all documents relating to potential mishandling of classified information by Mike Pence and any other potential witness in this case.

29. Please provide all documents—including drafts and communications regarding revisions, and source materials—relating to the November 12, 2020 “Joint Statement from Elections Infrastructure Government Coordinating Council & the Election Infrastructure Sector Coordinating Executive Committees” by CISA and others.

30. [REDACTED]

31. [REDACTED]

a. [REDACTED]

b. [REDACTED]

c. [REDACTED]

d. [REDACTED]

e. [REDACTED]

32. [REDACTED]

a. [REDACTED]

b. [REDACTED]

c. [REDACTED]

d. [REDACTED]

33. All documents relating to unauthorized and/or improper querying of FISA databases in connection with the investigation of events in the vicinity of Washington, D.C. on January 6, 2021. *See* FISC Order at 29 (Apr. 21, 2022) (“The queries were run against unminimized Section 702 information to find evidence of possible foreign influence . . .”), *available at* [https://www.intelligence.gov/assets/documents/702%20Documents/declassified/21/2021\\_FISC\\_Certification\\_Opinion.pdf](https://www.intelligence.gov/assets/documents/702%20Documents/declassified/21/2021_FISC_Certification_Opinion.pdf).

34. Please provide an unredacted copy of the document bearing production number SCO-04798336.

35. Please identify the custodian of the folders depicted in photographs in and around production number SCO-04798357.

36. Please provide all documents reflecting or relating to communications between any component of DOJ’s Criminal Division and DOJ’s Office of the Inspector General concerning President Trump, Jeffrey Clark, or the 2020 election.

37. Please provide all documents reflecting or relating to communications between the National Archives and Records Administration (“NARA”) and either the Special Counsel’s Office, DOJ, or White House Counsel, including:

a. Communications between NARA and component(s) of DOJ responsible for investigating election-related crimes; and

b. All documents relating to the Executive Privilege and the Presidential Records Act.

38. Please provide all documents reflecting or relating to communications regarding the 2020 election or President Trump between the U.S. Postal Inspector’s Office, including Timothy Heaphy, and DOJ or the Special Counsel’s Office.

39. [REDACTED]

40. Please provide all documents relating to the March 2021 “60 Minutes” interview of Michael Sherwin, including all documents relating to investigations of potential violations of applicable rules, policies, or procedures resulting from Mr. Sherwin’s participation in the interview.

41. Please provide all documents relating to communications between the Special Counsel’s Office and the United States House Select Committee on the January 6 Attack, established by H. Res. 503, 117<sup>th</sup> Cong. (2021) (the “House Select Committee”).

42. Please provide all documents related to the loss, destruction, and lack of retention of any documents or evidence by the Office of the Special Counsel, the Department of Justice, the White House, or the House Select Committee, related to events at the U.S. Capitol on January 6, 2021.

43. Please provide all documents relating to communications or coordination by the Special Counsel’s Office and DOJ with any of the Biden Administration, the Biden Campaign, Hunter Biden, the Biden family, the Biden White House, or any person representing Joe Biden.

44. Please provide all documents regarding Department of Justice policy regarding a prosecutor or special counsel signing or executing an indictment or other official records without having fully or properly executed the oath of office.

45. [REDACTED]

46. Please provide all documents relating to briefings provided to President Trump regarding:

a. Election security issues, prior to or after the 2020 election; or

b. Any sort of foreign influence efforts by foreign state or non-state actors, including but not limited to briefing summaries reflected in emails involving Beth Sanner and Edward Gistaro.

47. [REDACTED]

48. Please provide all emails involving Beth Sanner or Edward Gistaro.

49. Please provide all rough notes, working papers, recordings, reports, and statements of law enforcement agents or officers pertaining to this or related investigations.

50. Please identify any statements by any witness, prospective witness, or non-witness declarant that the prosecution team knows or should know are false.

51. Please identify statements made by any law enforcement official to any witness, prospective witness, or non-witness declarant suggesting that any member of the prosecution team tended to doubt the individual's credibility or the veracity of statements he or she has made that is relevant to the allegations in the indictment.

52. Please provide all information not otherwise requested that might potentially reflect either the motivation of a witness, prospective witness, or non-witness declarant to favor the government or be biased against President Trump.

53. [REDACTED]

54. [REDACTED]

55. Please provide all documents reflecting statements by any member of the prosecution team indicating an intent or effort to stop or hinder President Trump from becoming President of the United States.

56. We have found many redacted documents in the discovery production. There are likely many more because we cannot search for redactions. For each of these redactions, please explain why the document was redacted and provide the complete document.

57. Please identify any documents within the discovery production that have been edited or altered from their original content or format.

58. Please confirm that you have conducted a case-file review consistent with Justice Manual § 9-5.002.

59. Please confirm that your review of materials potentially subject to the Jencks Act and *Giglio* has included all electronic facilities used by each witness, including both classified and unclassified email accounts, classified and unclassified chat and messaging programs, personal email accounts, personal phones, and personal messaging apps.

We expect to submit additional questions and requests on a rolling basis. Please let us know if you would like to discuss any of these issues.

Respectfully Submitted,



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Gregory M. Singer  
Filzah I. Pavalon  
LAURO & SINGER

Todd Blanche  
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# **EXHIBIT C**

(Redacted)

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November 15, 2023

**Via Email:** MGG@usdoj.gov; TPW@usdoj.gov

Molly Gaston  
Thomas P. Windom  
Senior Assistant Special Counsels  
950 Pennsylvania Avenue NW  
Room B-206  
Washington, D.C. 20530

**Re: United States v. Donald J. Trump, No. 23 Cr. 257 (TSC)**

Dear Ms. Gaston and Mr. Windom:

Your recent filings indicate that you plan to present evidence regarding the activities of protesters on January 6, 2021, at the Capitol and matters related thereto. We do not believe that such evidence is relevant to the charges and is extremely prejudicial, serving only to inflame and confuse the jury. See, e.g., Dkt. No. 115. Nonetheless, we must be prepared to defend these uncharged accusations so additional clarification and discovery is needed. Please do not take this request as an indication that we believe any evidence or argument related to the protest or violence on January 6<sup>th</sup> is relevant and admissible, but in the interest of expediency, we must better understand your position on these subjects and resolve discovery issues prior to any admissibility determination.

As an initial matter, please let us know what aspects of the January 6<sup>th</sup> events you assert are relevant and what you intend to offer into evidence at trial. Because most actions at the Capitol on January 6<sup>th</sup> are outside of the Indictment, we ask that you identify the scope of your trial presentation so that we may conduct discovery accordingly.

In our October 23, 2023 discovery letter, we requested information related to some aspects of the January 6<sup>th</sup> protests, including identification of informants and other undercover operatives and the details of their participation, prior bids for security and National Guard assistance, 302s and other memoranda regarding January 6<sup>th</sup> investigations, foreign interference or involvement with January 6<sup>th</sup> activities, and querying of FISA databases related to January 6<sup>th</sup>. Below, we have some additional requests for January 6<sup>th</sup> related materials. These are subject to change based on explanation of the scope of your trial presentation.

As our motion to compel deadline is approaching, we must get your position on these issues and unresolved discovery disputes straightaway. Given that both parties will be in Washington, D.C. next Monday for oral argument, we propose having

a meet and confer meeting on Tuesday, November 21, 2023. We have set forth the additional requests below for your consideration prior to the meeting.

## **I. Background**

Each of the Requests set forth below calls for production of documents irrespective of their classification level. As used herein, the term “documents” includes (i) all communications, including memoranda, reports, letters, notes, emails, text messages, videos, and other electronic communications; (ii) hard copies and electronically stored information, whether written, printed, or typed; and (iii) all drafts and copies.

As used herein, the term “foreign influence” is broader than the definition of the term “foreign interference” in Executive Order 13848 and includes any overt or covert effort by foreign governments and non-state actors, as well as agents and associates of foreign governments and non-state actors, intended to affect directly or indirectly a US person or policy or process of any federal, state, or local government actor or agency in the United States.

The Requests call for specified documents in the possession of the prosecution team, as we defined that term in our October 15, 2023 letter to you.

## **II. Requests**

1. Your response to our October 23, 2023 letter provided numerous objections but did not clarify your position on relevancy with respect to each request. Therefore, regarding our October 23 requests and each of the specific requests below, please specifically indicate whether you will produce the documents requested, and, if not, whether you contend: (1) the documents are not relevant to this case; (2) the documents are relevant, but the prosecution team, as you define it, does not have possession, custody, or control of the documents; or (3) the documents are relevant, and are in the possession custody, or control of the prosecution team, but you nonetheless believe the government is not required to produce the requested documents. Additionally, for any documents you contend are not relevant, please confirm that you will not present any evidence on the identified subject in your case in chief at trial.

2. If you intend to introduce evidence at trial of any injuries sustained to law enforcement or anyone else at the Capitol on January 6, 2021, please provide all documents regarding those injured during the protest at the Capitol, including medical records.

3. Please provide all prior law enforcement and military intelligence regarding the Ellipse rally and the protest at the Capitol on January 6<sup>th</sup>, including the distribution and briefings of the intelligence.

4. Please provide all memoranda regarding interviews of law enforcement officers regarding the Ellipse rally and the protest at the Capitol on January 6<sup>th</sup>.

5. Please provide all documents regarding law enforcement, security, or National Guard preparations for the Ellipse rally and the protest at the Capitol on January 6<sup>th</sup>.

6. Please provide all documents regarding the Sergeant at Arms of the United States House of Representatives' preparations for the Ellipse rally and the protest at the Capitol on January 6<sup>th</sup>.

7. Please provide all law enforcement operations plans to include operational control, reporting structure, and distribution for the Ellipse rally and the protest at the Capitol on January 6<sup>th</sup>.

8. [REDACTED]

9. Please provide all documents regarding the Washington, D.C. Mayor's preparations for the Ellipse rally and the protest at the Capitol on January 6<sup>th</sup>, including discussion regarding law enforcement and National Guard presence.

10. Please provide all documents regarding the Washington, D.C. Metro Police Department's preparations for the Ellipse rally and the protest at the Capitol on January 6<sup>th</sup>.

11. Please provide all documents regarding preparations by members of Congress for the Ellipse rally and the protest at the Capitol on January 6<sup>th</sup>, including instructions to Capitol Police, law enforcement, and the National Guard.

12. Please provide all documents relating to permits issued and applications for permits submitted for any protest, rally, or gathering in the vicinity of the Capitol on January 6<sup>th</sup>, including communications regarding such permits (or permit applications), protests, rallies, or gatherings.

13. Please provide all video of the January 6<sup>th</sup> protest inside and outside the Capitol that you intend to introduce at trial. We reserve the right to request additional video once you have identified the video you intend to introduce.

14. Please provide all documents relating to efforts by foreign actors, whether state or non-state, to "undermine public faith in the US democratic progress" referenced in the 2016 Election ICA, including all documents that provided the basis for that language in the ICA.

15. Please provide all documents regarding the investigation into alleged pipe bombs or other explosives found near the Democratic National Committee and Republican National Committee buildings.

16. Please provide all documents regarding offers of immunity, forgoing of prosecution, diversion, USSG 5K1.1 reductions, or any other consideration to persons under investigation or charged regarding activities related to January 6<sup>th</sup>.

17. Please provide all intelligence regarding the presence and activities of persons associated with Antifa at the Ellipse rally and the protest at the Capitol on January 6<sup>th</sup>.

18. Please provide all documents regarding Antifa or persons associated with law enforcement who encouraged or participated in any illegal activities on January 6<sup>th</sup>.

19. Please provide all documents regarding Ray Epps, the “scaffold commander,” John Nichols, or any similar persons who encouraged or participated in any illegal activities on January 6<sup>th</sup>.
20. Please provide all intelligence assessments or the Daily Intelligence Report for the Make America Great Again rallies on November 14, 2020 and December 12, 2020.
21. Please provide any transcripts of videos of the Congressional debates regarding the certification on or about January 6<sup>th</sup>.
22. Please provide all documents regarding the effect of the December 20, 2021 protests in Washington, D.C. on the preparations for the Ellipse rally and the protest at the Capitol on January 6<sup>th</sup>.
23. Please provide all documents regarding the Norfolk memo (Norfolk Situational Information Report) including the memo itself and its distribution.
24. Please provide all documents from the Joint Terrorism Task Force regarding the Ellipse rally and the protest at the Capitol on January 6<sup>th</sup>.
25. Please provide all documents from LEAP regarding the Ellipse rally and the protest at the Capitol on January 6<sup>th</sup>.
26. Please provide all training manuals and standard operating procedures regarding crowd and riot control for the Capitol Police, Washington, D.C. Metro Police, Federal Bureau of Investigation, and Department of Homeland Security.
27. Please provide all documents relating to militias planning to gather, or gathering, at the Capitol on January 6<sup>th</sup>.
28. Please provide all communications between Yogananda Pittman and Nancy Pelosi, Nancy Pelosi’s staff, or representative of Nancy Pelosi.
29. Please provide all documents regarding any threats to state or local employees or officials who alleged they were threatened as a result of their role in any state or local election for the 2020 election.
30. Please provide all documents related to Steven Sund’s statements that he “believed officials were aware of the January 6 U.S. Capitol insurrection before it happened and covered it up.”
31. Please provide all communications between Steven Sund and members of Congress and Congressional staff related to January 6<sup>th</sup>.
32. Please provide all communications between Steven Sund and other law enforcement agencies, Department of Defense, and National Guard related to January 6<sup>th</sup>.

33. Please provide all intelligence provided to Steven Sund related to January 6<sup>th</sup>.
34. Please provide all documents regarding all government sources who were queried and / or provided information regarding the events of January 6<sup>th</sup>. Production should include, but not be limited to, FBI CHS and PCHS queries and resulting 1023 reports. Production should also include, but not be limited to, all source reporting from individuals or sources associated with any law enforcement agency and any agencies in the intelligence community.
35. Please provide all documents related to investigations into the “gallows” which were placed in front of the Capitol in the early morning hours of January 6<sup>th</sup>.
36. Please provide all documents regarding the individual dubbed “fence cutter bulwark” who was captured on video removing fencing in advance of the crowd moving from the Ellipse toward the Capitol.
37. Please provide all documents provided by Capitol Police Officers and whistleblowers to the Inspector General regarding January 6<sup>th</sup>.
38. Please provide all testimony, statements, and memoranda of all witnesses you expect to call at trial regarding the protest or violence at the Capitol on January 6<sup>th</sup>.

Sincerely,



John F. Lauro

cc: Todd Blanche, Esq. ([toddblanche@blanchelaw.com](mailto:toddblanche@blanchelaw.com)); Emil Bove, Esq. ([emil.bove@blanchelaw.com](mailto:emil.bove@blanchelaw.com))

# EXHIBIT D



**U.S. Department of Justice**

Special Counsel's Office

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October 24, 2023

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John Lauro, Esq. (via email: jlauro@laurosinger.com)  
Lauro and Singer  
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101 Kennedy Boulevard, Suite 3100  
Tampa, FL 33602

Re: *United States v. Donald J. Trump*, Case No. 23-cr-257 (TSC)

Dear Counsel:

I write, in unclassified form, in response to your classified discovery letter dated October 15, 2023.

First: Regarding the query at the outset of your letter, we disagree with how you define the prosecution team. Your definition is overly broad. The prosecution team consists of the prosecutors of the Special Counsel's Office and law enforcement officers who are working on this case. The prosecution team does not include agencies and components whose personnel are not working on this case. To point out but a few of the exceedingly broad errors in your assertion, the prosecution team does not include the almost three million civilian, active duty, and reserve members of the Department of Defense; the 260,000 employees of the Department of Homeland Security (or its CISA component); or the Intelligence Community writ large. Furthermore, your attempt to serve Rule 17(c) subpoenas, ECF No. 99—definitionally reserved for non-party witnesses—on the House Select Committee's successor entity and a member of the White House Counsel's Office confirms your understanding that those entities are not members of the prosecution team.

Second: You requested 54 categories of documents. We noted in an email on October 18, 2023, that we did not anticipate producing anything additional in response to your requests. We confirm that now. To the extent the Government has not already produced responsive material, the requests do not call for material that is discoverable under Rule 16 of the Federal Rules of Criminal Procedure or any other discovery obligation.

We stand ready to confer with you or answer further questions. Please do not hesitate to contact us.

Respectfully,

JACK L. SMITH  
Special Counsel

/s/ Thomas P. Windom

Thomas P. Windom

Molly Gaston

Senior Assistant Special Counsels

# **EXHIBIT E**

(Redacted)



**U.S. Department of Justice**

Special Counsel's Office

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November 3, 2023

Todd Blanche, Esq. (*via email*: toddblanche@blanchelaw.com)  
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Re: *United States v. Donald J. Trump*, Case No. 23-cr-257 (TSC)

Dear Counsel:

We write in response to your discovery letter dated October 23, 2023, in which you make 79 “discrete requests” for discovery.

As an initial matter, we previously rejected the definition of “prosecution team” you attempted to impose in your October 15 discovery letter. Please see our October 24 discovery letter for more information.

The vast majority of the expansive requests in your October 23 letter are deficient. Many of your requests seek information that exceeds the scope of the Government’s discovery obligations and/or is not within the possession of the prosecution team. Other requests seek information that already has been produced, as reflected in the detailed Source Logs accompanying each of our productions and as would be evident from keyword searches of those productions. Some requests are too vague for us to discern with particularity what you are requesting. Still other requests follow up on documents that we produced in excess of our discovery obligations. To the extent that we produce or have produced information that is responsive to your discovery requests, that production does not imply that we concede the information’s discoverability or obligate us to make any additional productions that exceed our existing discovery obligations.

Notwithstanding the above, to the extent that the following requests call for information that is discoverable and in the possession of the prosecution team, we have produced that information already or will produce it consistent with the Court’s scheduling order: Requests 1-7, 8a, 8c-8L, 9-13, 15-18, 21, 22, 24-27, 29, 32a, 34-36, 37a, 37b, 38, 39, 41, 43, 45, 46a, 46b, 47, and 49-53.

Furthermore, we seek additional information in an effort to better understand some of your requests. In particular, the following requests do not appear to call for the production of material

to which the defense is entitled: Requests 8b, 19, 20, 28-30, 31a-31e, 32b-32d, 33, 40, 42-44, 48, 54, 55, 58, and 59. Please explain the defense's theory of discoverability. And the following requests are so vague that we are not sure exactly what you seek: Requests 14 and 23. Please clarify your requests.

In order to assist your review of prior discovery productions or further explain our positions on certain specific requests, below we provide additional information using the numbering from your letter. The Bates numbers identified below are examples of ranges that contain documents responsive to your requests; they are not an exhaustive list of where in the productions responsive material may be located.

4. [REDACTED]

5. [REDACTED]

8a. [REDACTED]

8f. [REDACTED]

8j. [REDACTED]

13. Pursuant to the scheduling order, the parties will provide exhibit lists on December 18, 2023. *See* ECF No. 39 ¶ 8.

17. [REDACTED]

24. [REDACTED]

27. As noted in the August 11, 2023, cover letter, our first discovery production “contains transcripts and exhibits from witness testimony presented to a grand jury in the District of Columbia through Tuesday, August 1, 2023.” Appended to that cover letter, as Attachment A, was a Source Log, which in the first line noted that the grand jury transcripts and exhibits were located at SCO-00000001-00032167. Subsequent Source Logs explained where in follow-on productions additional grand jury transcripts and exhibits are located. *See, e.g.*, SCO-11630429, produced Aug. 19, 2023; SCO-12811118, produced Sept. 22, 2023. Further, our October 13, 2023, response to your October 4, 2023, letter included a Supplemental Source Log for Production 1A, which further delineated, within the range above, the specific ranges for the transcripts and exhibits of the grand jury witnesses.

29. [REDACTED]

32a. [REDACTED]

34. [REDACTED]

35. The document at Bates number SCO-04798357 was obtained from the hard copy files, in storage, of the Office of the Attorney General in the prior administration.

37b. The defendant was party to five miscellaneous matters regarding assertion of the executive privilege. Attachments to filings in those five matters included letters from the incumbent White House declining to invoke executive privilege over certain witness testimony. The defendant already has these materials.

41. [REDACTED]

42. Please see our opposition to your motion regarding Rule 17(c) subpoenas, at ECF No. 119.

43. With the exception of the materials described above in our response to Request 37(b), your request does not appear to call for the production of material to which the defense is entitled. Please explain the defense’s theory of discoverability.

46a. [REDACTED]

46b. [REDACTED]

47. [REDACTED]

49. [REDACTED]

50. You appear to be requesting *Giglio* information. To the extent we have not already provided it, we will comply with the *Giglio* deadline set in the scheduling order. *See* ECF No. 39 ¶ 6.

51. You appear to be requesting *Giglio* information. To the extent we have not already provided it, we will comply with the *Giglio* deadline set in the scheduling order. *See* ECF No. 39 ¶ 6.

52. You appear to be requesting *Giglio* information. To the extent we have not already provided it, we will comply with the *Giglio* deadline set in the scheduling order. *See* ECF No. 39 ¶ 6.

53. [REDACTED]

56. You request an explanation and an unredacted copy of every redacted document in discovery. Certain original files were redacted or modified, for example, to remove irrelevant information, to redact Social Security numbers, or by the filter team. Sometimes, we received documents already containing redactions. If you have a question about a particular redaction, please identify the Bates number for that document so that we may further consider your request.

57. Certain original files were redacted or modified, for example, to remove irrelevant information, to redact Social Security numbers, or by the filter team. In addition, to the extent that

we were aware that loading an item into a review platform might alter the item's content, we provided that item in native format. If you have a question as to whether a particular document was "edited or altered from their original content or format," please identify the Bates number for that document so that we may further consider your request.

58. The Government has proceeded consistently with the provisions of the Justice Manual. In any event, the Justice Manual does not create rights for criminal defendants. *See* Justice Manual § 1-1.200 ("The Justice Manual provides internal DOJ guidance. It is not intended to, does not, and may not be relied upon to create any rights, substantive or procedural, enforceable at law by any party in any matter civil or criminal.").

59. We understand our discovery obligations and will comply with them.

We stand ready to confer with you or answer further questions. Please do not hesitate to contact us.

Respectfully,

JACK L. SMITH  
Special Counsel

/s/ Thomas P. Windom

Thomas P. Windom

Molly Gaston

Senior Assistant Special Counsels

# **EXHIBIT F**

(Redacted)



**U.S. Department of Justice**

Special Counsel's Office

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November 25, 2023

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Re: *United States v. Donald J. Trump*, Case No. 23-cr-257 (TSC)

Dear Counsel:

We write in response to your discovery letter dated November 15, 2023, and to follow up on our meet-and-confer discussion on November 21.

As an initial matter, during that discussion, you clarified that your questions about the scope of the prosecution team concerned documents available to you as a result of the defendant's case in the Southern District of Florida, as well as which law enforcement agencies worked on the investigation leading to this case. First, as we stated in our discovery letter of August 28, we produced witness statements (grand jury or interview) given by witnesses in the investigation leading to your client's criminal case in the Southern District of Florida, where the witness also was interviewed or testified in the investigation underlying this case. *See, e.g.*, CDI Witness Interviews, SCO-11623400 through SCO-11630313. If you believe that there are other records in the Southern District of Florida case that may be discoverable in this case, we welcome further discussion. For example, we respond below to the issue you raised with respect to a document that you characterized as related to Mike Pence. Second, law enforcement agencies that worked on the investigation leading to this case were the Federal Bureau of Investigation; the Department of Justice Office of the Inspector General (DOJ OIG); the National Archives Inspector General (NARA OIG); and the United States Postal Inspection Service (USPIS).

Turning next to the enumerated questions in your letter, we provide specific responses below. The Bates numbers identified below are examples of ranges that contain documents responsive to your requests; they are not an exhaustive list of where in the productions responsive material may be located. Moreover, to the extent that we produce or have produced information that is responsive to your discovery requests, that production does not imply that we concede the information's discoverability or obligate us to make any additional productions that exceed our existing discovery obligations.

Request 1. This question asked for additional responses to your letter of October 23, 2023. As a follow-up to our meet-and-confer discussion, we provide below some additional responses.

- Regarding Request 8b, you maintained your claim that information regarding the SolarWinds cyberattack is relevant to this case. We disagree.
- Regarding Request 14, you clarified that you were asking whether the Government was withholding as non-discoverable evidence of election fraud that was non-outcome determinative. We have not withheld evidence of election fraud in our possession.
- Regarding requests 19 and 29-32, you indicated during the course of our meet-and-confer call that these requests support the defense theories set forth in your CIPA Section 5 Notice. Accordingly, we refer you to the Government's Motion to Strike Defendant's CIPA Section 5 Notice, filed on November 9, 2023, regarding our position on the relevance and discoverability of these materials.
- Regarding Request 20, you stated that you believe it would be relevant to this case if a state legislator disagreed with state level judicial rulings on election matters. We disagree, but in any event, are not withholding any such material in our possession.
- Regarding Request 23, you stated that you are seeking any legal opinions regarding the validity of, or challenges to, mail-in ballots written by outside attorneys, external organizations, or civil servants. To the extent that we possess information reflecting opinions regarding mail-in ballots, we have produced it to you.
- [REDACTED]
- Requests 33, 40, 42, 43, and 44 seek information that exceeds the scope of our discovery obligations, is not within the possession of the prosecution team, and/or does not exist.
- Request 48 seeks Jencks material for Beth Sanner or Edward Gistaro. If we determine that we are calling either individual as a witness, we will provide you with discoverable emails by either individual that relate to the subject matter of his/her testimony.
- As we stated during our meet and confer, regarding Requests 54, 55, 58, and 59, we understand our discovery obligations and will continue to meet them.

Next, your November 15 discovery letter made a large number of requests related to January 6. Below, we respond on a question-by-question basis, but as an initial matter, we remind you that, as we stated in our first discovery letter on August 11, the United States Attorney's Office

for the District of Columbia (“USAO”) maintains a separate database of materials comprising discovery in criminal cases related to the breach of the Capitol on January 6, 2021. As we advised you, in the course of our investigation, we accessed certain materials within that database, took into our possession certain materials that we may rely upon or use at trial, and produced them to you in discovery in our case. In our August 11 letter, we also offered to facilitate your access to the USAO database. We reiterate that offer now.

Request 2.

Request 3. In our meet and confer, you made clear that this request pertains to any and all intelligence relating to the defendant's Ellipse event and the January 6 attack on the Capitol, regardless of whether the defendant or his staff knew of it. This request seeks information that exceeds the scope of the Government's discovery obligations and/or is not within the possession of the prosecution team. However, to the extent that there is such information in the materials that we gathered from sources such as the United States Secret Service or United States House of Representatives Select Committee to Investigate the January 6th Attack on the United States Capitol ("House Select Committee"), we have produced it to you.

Request 4. We produced interview reports and transcripts of law enforcement officers whom we interviewed relating to the defendant's Ellipse event and the January 6 attack on the Capitol. [REDACTED]

[illegible]

Requests 5-7, 9-11, 28, 30-33. These requests seek information that exceeds the scope of the Government's discovery obligations, is not within the possession of the prosecution team, and/or does not exist. However, to the extent that there is such information in the materials that we gathered from sources such as the United States Secret Service or House Select Committee, we have produced it to you.

Requests 8, 14. We refer you to the Government's Motion to Strike Defendant's CIPA Section 5 Notice, filed on November 9, 2023, regarding our position on the relevance and discoverability of these materials.

Request 12. This request seeks information that exceeds the scope of the Government's discovery obligations and/or is not within the possession of the prosecution team. Nonetheless, certain responsive information may be found within the prior productions, including SCO-11949602 through SCO-11960071 and SCO-03649872 through SCO-03650883.

Request 13. Certain responsive information may be found within the prior productions, including Production 06B, 08C, 10D, and 11D. We will identify trial exhibits by the Court's deadline of December 18. *See* ECF No. 39 ¶ 8.

Requests 15-19, 34-36. All of these requests—regarding the pipe bomb investigation, offers of immunity to January 6 defendants, “Antifa,” sources, and various named and unnamed January 6 offenders—appear to be focused on others' actions related to the January 6 attack on the Capitol. Many of them request information that exceeds the scope of our discovery obligations and/or is not within the possession of the prosecution team. To the extent that we possess any such materials, we have produced them to you. Relatedly, in our meet and confer, you stated that you believe that in certain other cases, the Department of Justice has taken a position inconsistent with the indictment's allegations that the defendant is responsible for the events of January 6. We disagree. The Department's position in other January 6 cases that the defendant's actions did not absolve any individual rioter of responsibility for that rioter's actions—even if the rioter took them at the defendant's direction—is in no way inconsistent with the indictment's allegations here.

Request 20. This request seeks information that exceeds the scope of our discovery obligations and/or is not within the possession of the prosecution team.

Request 21. [REDACTED]

Request 22. During the meet-and-confer call, you suggested that this request concerned a Black Lives Matter protest that occurred on December 20, 2020. In order to respond to this request, we need additional information about the protest you are referencing.

Requests 23-25. These requests seek information that exceeds the scope of the Government's discovery obligations and/or is not within the possession of the prosecution team. Nonetheless, certain responsive information may be found within the prior productions, including SCO-00686197 through SCO-00686203, produced in Production 01C.

Request 26. This request seeks information that exceeds the scope of the Government's discovery obligations and/or is not within the possession of the prosecution team. Nonetheless,

certain responsive information may be found within the prior productions, including SCO-11520764.

Request 27. This request seeks information that exceeds the scope of the Government's discovery obligations and/or is not within the possession of the prosecution team. Nonetheless, certain responsive information may be found within the prior productions, including from sources such as the House Select Committee.

Request 29. We have provided you with extensive evidence supporting the pattern of threats to officials as a result of their roles in the 2020 election—often as a result of the defendant's targeting of them. For examples, we refer you to ECF No. 47-2.

Request 37. [REDACTED]  
[REDACTED]  
[REDACTED]

Request 38. You appear to be requesting Jencks material. To the extent we have not already produced it, we will comply with our Jencks obligation well in advance of trial.

Lastly, during our meet-and-confer call, you mentioned that there were some technological glitches in previous document productions. As we stated, and as we previously offered, we will gladly arrange a phone call with our litigation support staff to resolve any such issues.

Respectfully,

JACK L. SMITH  
Special Counsel

/s/ Molly Gaston  
Molly Gaston  
Thomas P. Windom  
Senior Assistant Special Counsels

# EXHIBIT G

(Redacted)



**U.S. Department of Justice**

Special Counsel's Office

August 11, 2023

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Re: *United States v. Donald J. Trump*, Case No. 23-cr-257 (TSC)

Dear Counsel:

Pursuant to the Protective Order entered in this matter on August 11, 2023 (ECF No. 28), the Government hereby makes its first production of unclassified discovery in this case. A minimal amount of classified material related to this matter will be handled separately, in accordance with the Classified Information Procedures Act (CIPA), 18 U.S.C. App. 3.

Pursuant to the Protective Order (and as indicated in the attached, detailed Source Logs), the Government designates everything in Production One as Sensitive except for the following Bates ranges:<sup>1</sup>

- SCO-00454838 – SCO-00456571;
- SCO-00470148 – SCO-00481133;
- SCO-00481134 – SCO-00685293;
- SCO-00685294 – SCO-00686138;
- SCO-04094057 – SCO-04094747;
- SCO-04948842 – SCO-04976506;
- SCO-06429174 – SCO-06430302; and

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<sup>1</sup> Prior to the parties' August 11, 2023, hearing before the Court, the Government had prepared the materials being produced today to include the marking, "SUBJECT TO PROTECTIVE ORDER." This marking does not supersede any "Non-Sensitive" designations as noted in the Source Logs and subject to the Court's protective order.

- SCO-11568641 – SCO-11572014.

Additionally, the following Bates ranges were produced by entities associated with the defendant. As indicated during today's hearing, the Government is willing to confer with you and any representative authorized to speak on behalf of those entities regarding whether these materials can be excluded from the Sensitive designation or are already in the defendant's possession such that they are not covered by the Protective Order:

- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]; and
- [REDACTED]

Production 1 is available in 14 parts, each password protected. Production 1A – M are each in load-ready format, available through a link. Production 1N is available via a hard drive. If you prefer to receive Production 1A – M on a hard drive, please let us know, and we will accommodate that request.

As an initial matter, to assist in your review of the discovery materials and as noted below, Production 1M, further described and linked to below, is a compilation of key documents. This compilation represents a reproduction of documents included in the other productions and includes testimony and documents that support the indictment in this case, other material determined by the Government to be pertinent, and information that is arguably favorable to the defense, including summary agent testimony and associated exhibits before the grand jury at SCO-11575555 – SCO-11605671.

Set forth below is a summary of what is included in each portion of Production 1. To further facilitate your review, each part of Production 1, except Production 1M, has a corresponding Source Log that denotes by Bates range the source of the material.

- **Discovery Production 1A – 8/3/2023**, consisting of material in the Bates range SCO-00000001 through SCO-00481133, is available through the link below. [REDACTED]

[REDACTED]

- **Discovery Production 1B – 8/3/2023**, consisting of material in the Bates range SCO-00481134 through SCO-00685293, is available through the link below. [REDACTED]

- [REDACTED]
- [REDACTED]
- **Discovery Production 1C – 8/3/2023**, consisting of material in the Bates range SCO-00685294 through SCO-01625791, is available through the link below. [REDACTED]
- [REDACTED]
- [REDACTED]

- **Discovery Production 1D – 8/3/2023**, consisting of material in the Bates range SCO-01625792 through SCO-02348189, is available through the link below. [REDACTED]
- [REDACTED]
- [REDACTED]

- **Discovery Production 1E – 8/3/2023, Discovery Production 1F – 8/3/2023, Discovery Production 1G1 – 8/3/2023, and Discovery Production 1G2 – 8/3/2023**, consisting of material in the Bates range SCO-02348190 through SCO-08289702, are available through the links below. As reflected in the Source Logs, these Discovery Productions include materials obtained from various individuals, private entities, government entities, and open-source materials.
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

- **Discovery Production 1H – 8/3/2023**, consisting of material in the Bates range SCO-08289703 through SCO-8380611, is available through the link below. [REDACTED]
- [REDACTED]

- [REDACTED]
- **Discovery Production 1I – 8/3/2023 and Discovery Production 1J – 8/3/2023**, consisting of material in the Bates range SCO-08380612 through SCO-11506088, is available through the links below. [REDACTED]
- [REDACTED]
- [REDACTED]

- **Discovery Production 1K – 8/3/2023**, consisting of material in the Bates range SCO-11506089 through SCO-11552086, is available through the link below. As reflected in the Source Log and described in more detail below, Discovery Production 1K includes witness statements for interviews and attempted interviews conducted in this investigation.
- [REDACTED]

- **Discovery Production 1L – 8/3/2023**, consisting of material in the Bates range SCO-11552087 through SCO-11572394, is available through the link below. As reflected in the Source Log, Discovery Production 1L includes, *inter alia*, additional grand jury transcripts and exhibits through August 1, 2023, additional exhibits to the House Select Committee Final Report, an additional Court Order, additional documents from a search warrant return, and a few additional productions from individuals, private entities, and governmental entities.
- [REDACTED]

- **Discovery Production 1M – 8/3/2023**, the aforementioned compilation of key documents with the Bates range SCO-11572395 through SCO-11619680, is also available in load-ready format through the link below. This disclosure is not intended to be exhaustive or to include every “key” or pertinent document. This disclosure does not limit the Government’s presentation at trial of documentary evidence. The Government reserves the right to present at trial documentary evidence not included in the key document compilation. The link to this production is:
- [REDACTED]

- **Production 1N**, consisting of returns from 2703(d) orders, certain electronic data obtained through grand jury subpoenas, and extractions from certain electronic facilities, is being made available on a hard drive, along with the UFED viewer to facilitate the review of the electronic material. Please note that the extracted contents of 4 of the 5 electronic devices are also included in the load ready files within the Bates ranges SCO-03065790 – SCO-3630352 and SCO-03647014 – SCO-03647444. [REDACTED]

[REDACTED] To facilitate your review, we also have included a Source Log identifying the material on the hard drive. Please let us know to what addressee and address we should provide this hard drive.

For ease of use, each of the links above will also be provided in a separate email. We will also provide the password to access each of the production links under separate cover. Please note that the download links for Productions 1A – 1M expire in approximately 180 days. Should you have any questions about how to access the production sets, or difficulty doing so, please contact us. If necessary, we will make our paralegal and/or litigation support staff available to answer questions and help facilitate your access to the production sets.

**Background on Production 1**

To assist your review and access of the discovery, we note the following features of Production 1:

- [REDACTED]
- [REDACTED]

### **Search Warrants on Electronic Devices/Accounts**

This first discovery production includes material obtained pursuant to search warrants, as reflected in the Source Logs, as well as the warrants and underlying applications. The Government followed the filter protocols set forth in the warrants in accessing the seized items and providing them to the investigative team. The filtered productions also were scoped to identify and seize items responsive to the warrant. Production 1 contains filtered and scoped materials from the search warrant returns. In the District of Columbia, when the scoping process for a search warrant return is completed, the investigative team no longer has access to material identified as not being within the scope of the warrant. Please inform us promptly if you believe you are entitled to any unfiltered or unscoped search warrant returns.

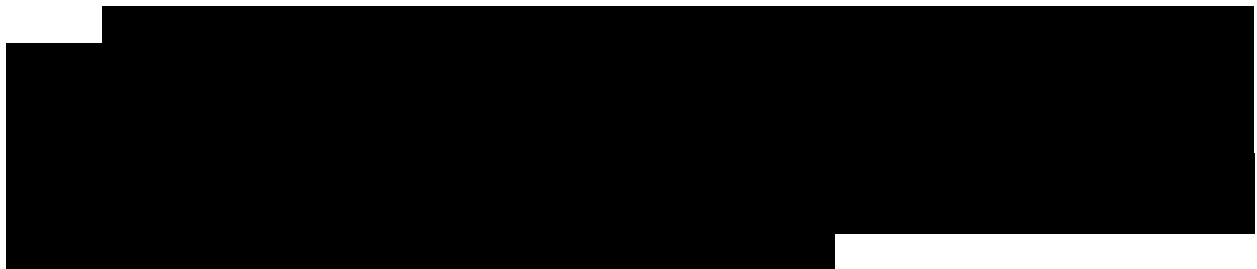
Please note that there will be additional productions of discovery. For example, the Government is still processing some devices and search warrant returns. We will disclose the responsive material promptly upon completion of that process, which we expect to be in the near term.

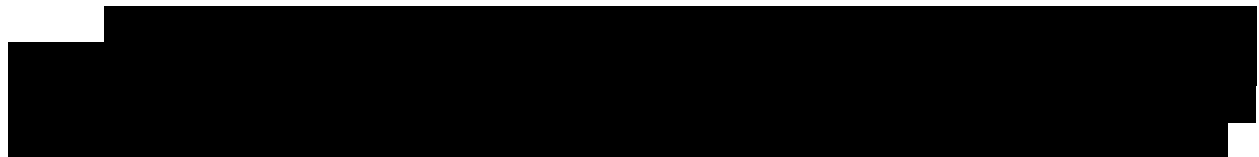
### **Scope of Discovery**

The United States Attorney's Office for the District of Columbia ("USAO") maintains a separate database of materials comprising discovery in the criminal cases related to the breach of the United States Capitol on January 6, 2021. The investigative team has accessed certain materials within that database and has taken into its possession certain materials that the investigative team may rely upon or use at trial. Any such materials have been included in Production 1 or will be included in future productions. To the extent that the investigative team identifies any additional materials from the USAO's database that it takes into the investigative team's possession, those materials will be provided in future productions in this case. If you believe that the remainder of the evidence included in the USAO's database is relevant and you would like access to it, please let us know.

The investigative team was also provided a laptop by one of the defendant's electors in Michigan. We have reviewed the laptop to identify and produce in discovery materials related to this matter. If you would like to inspect the laptop further, please let us know so we can arrange a time for you to do so.

The investigative team also had access to email boxes, select files, and mobile devices of certain then-employees of the Department of Justice during the relevant time-period. We have reviewed and continue to review those materials to identify and to produce in discovery materials related to this matter. We anticipate those materials to be finalized and produced in the near term.





The Government's first discovery production meets and exceeds our obligations under Rules 16 and 26.2 of the Federal Rules of Criminal Procedure, the Jencks Act (18 U.S.C. § 3500), or *Brady, Giglio*, and their progeny. The production of non-discoverable material does not obligate the Government to provide other non-discoverable material, and the fact that certain non-discoverable material is provided should not be taken as a representation as to the existence or non-existence of any other non-discoverable material.

**Request for Reciprocal Discovery**

By this letter, the Government also requests reciprocal discovery pursuant to Rule 16(b)(1) of the Federal Rules of Criminal Procedure.

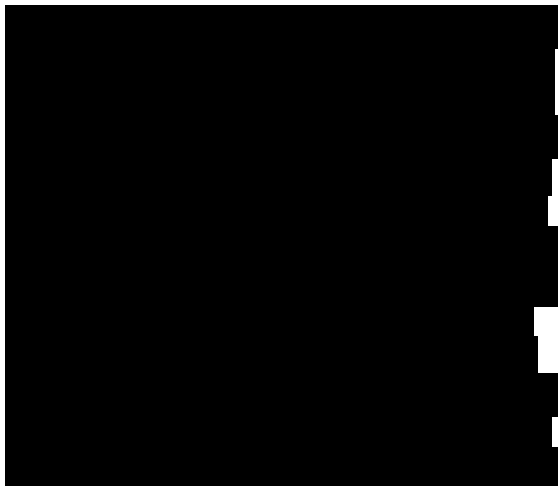
If you have any questions, please feel free to contact us.

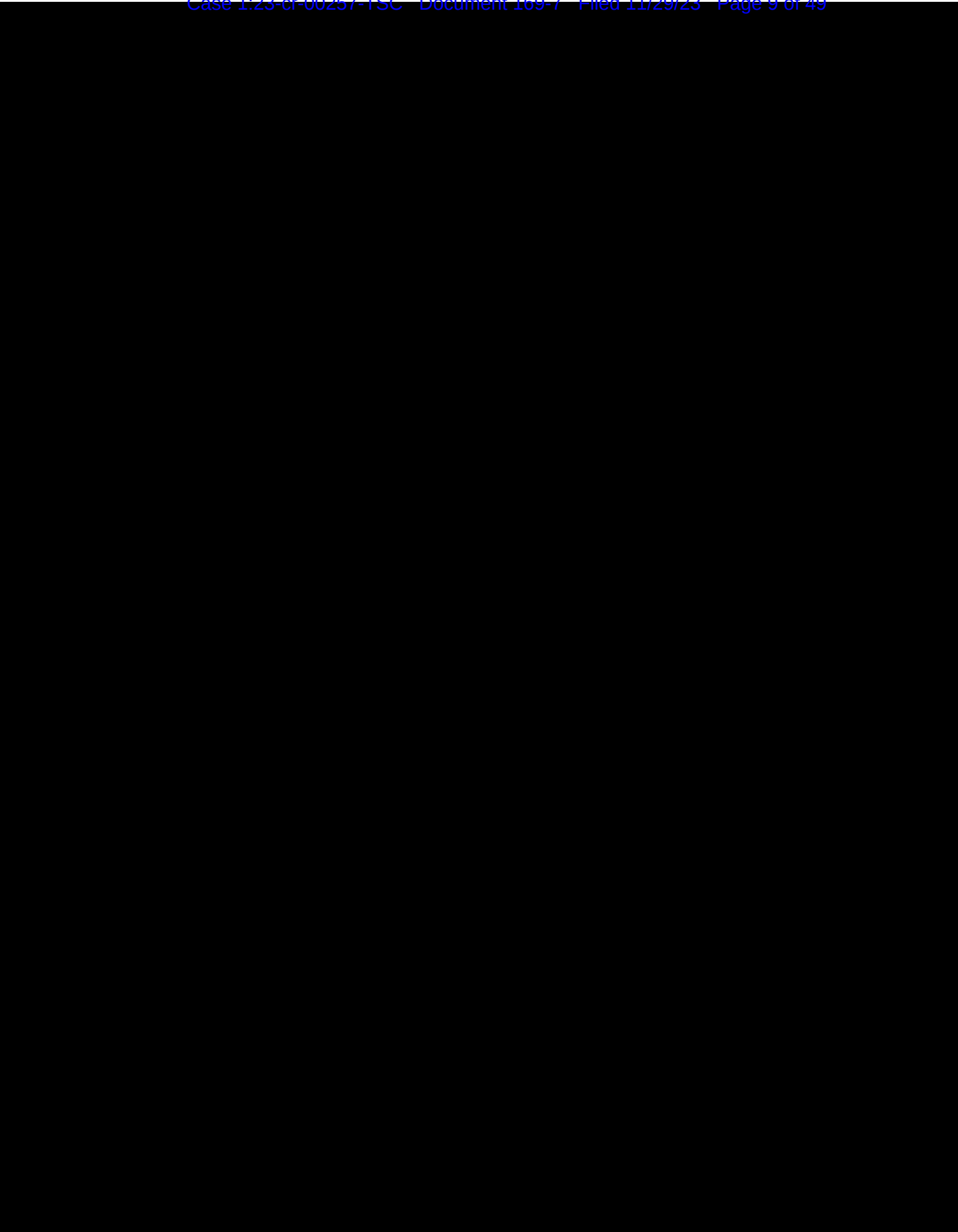
Yours truly,

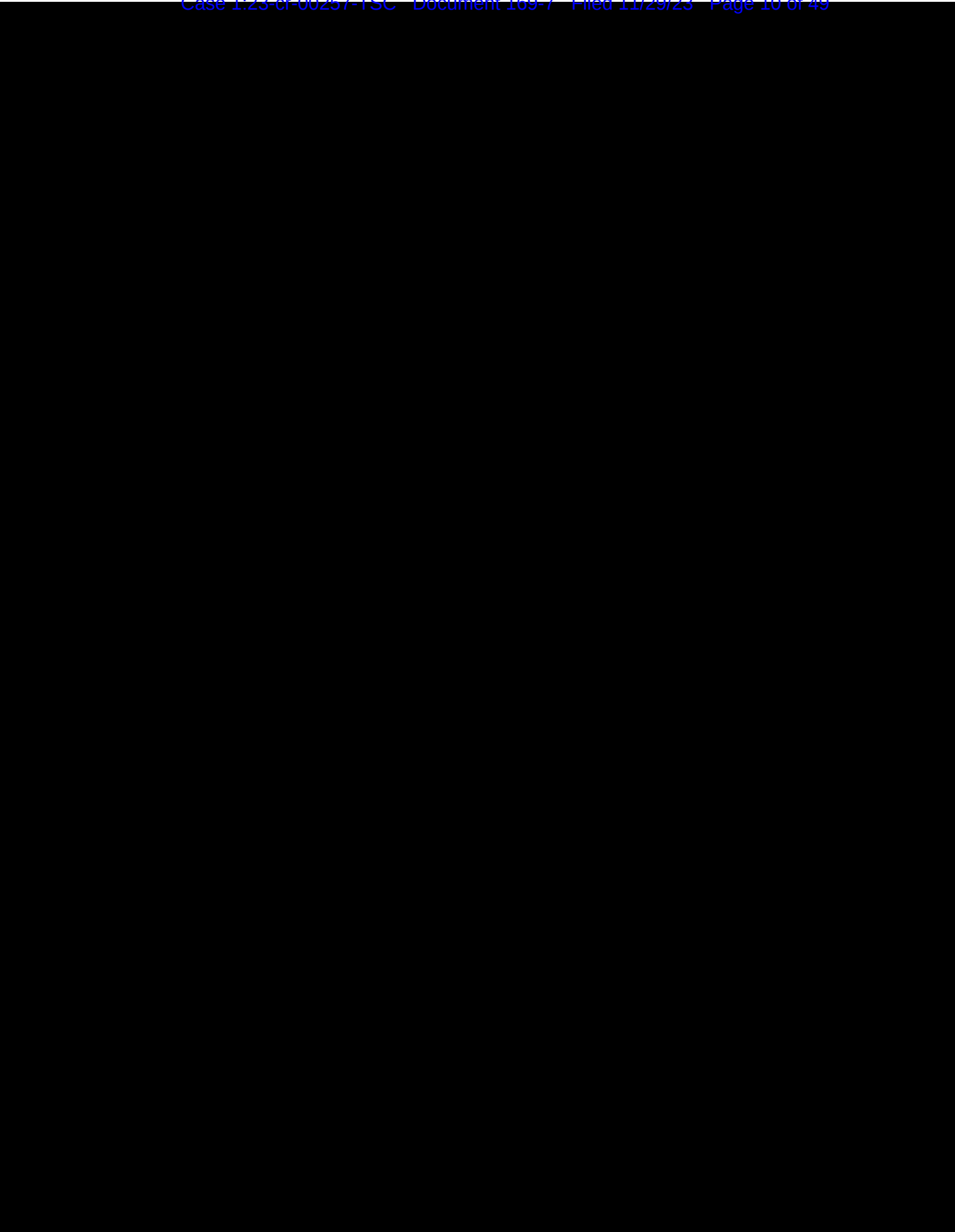
JACK L. SMITH  
Special Counsel

/s/Molly Gaston  
\_\_\_\_\_  
Thomas P. Windom  
Senior Assistant Special Counsel  
Molly Gaston  
Senior Assistant Special Counsel  
Maria K. Vento  
Assistant Special Counsel

Enclosures:







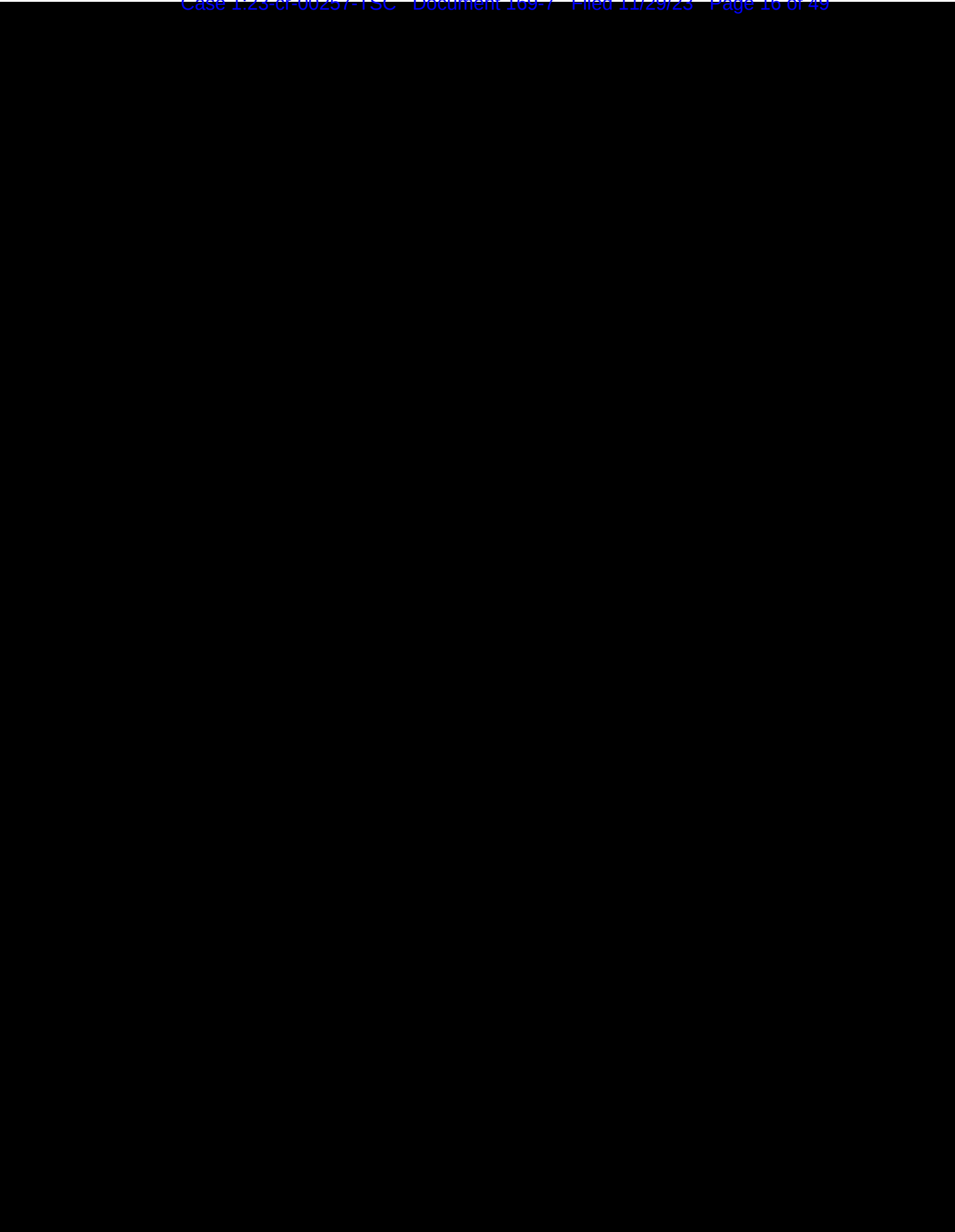


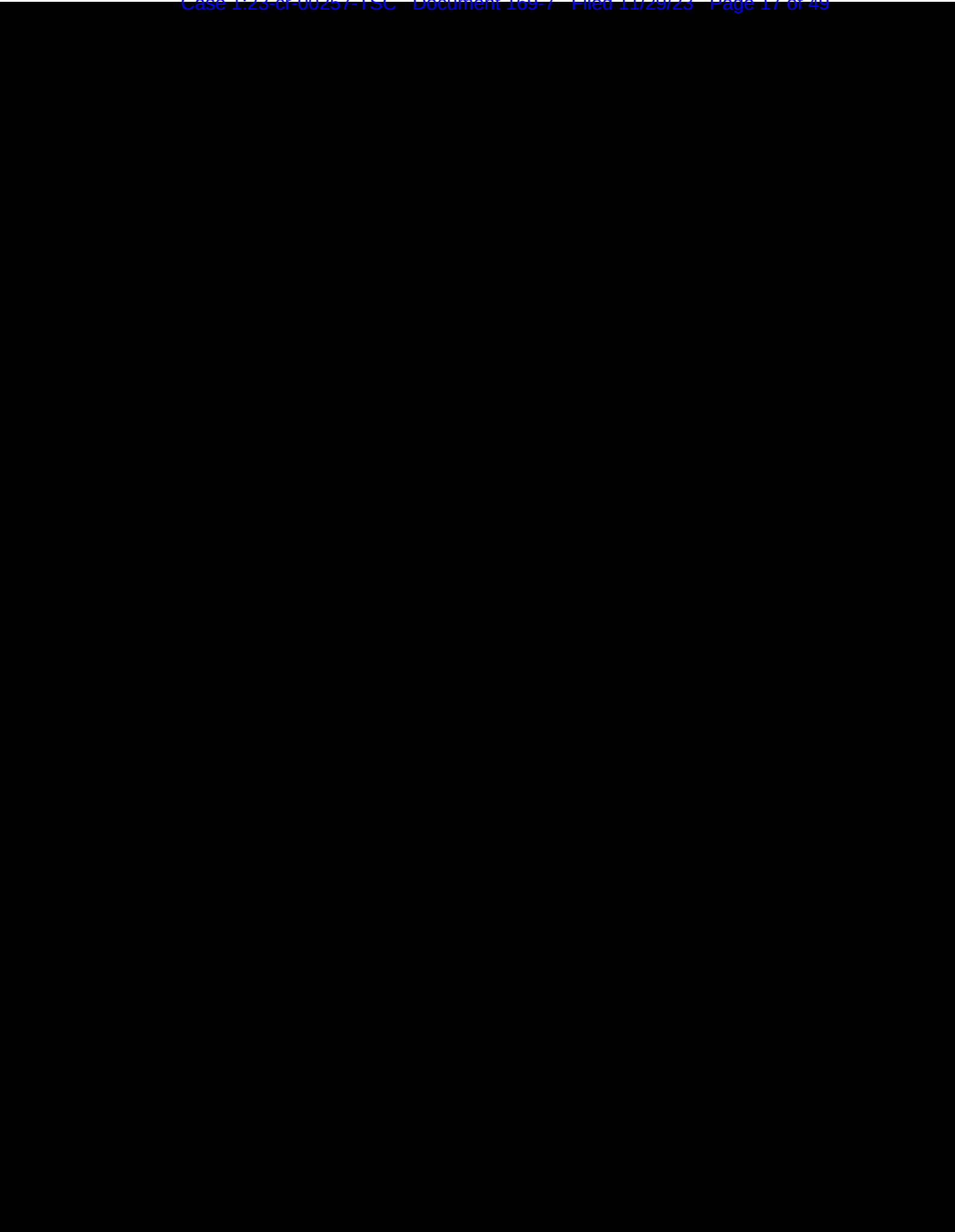


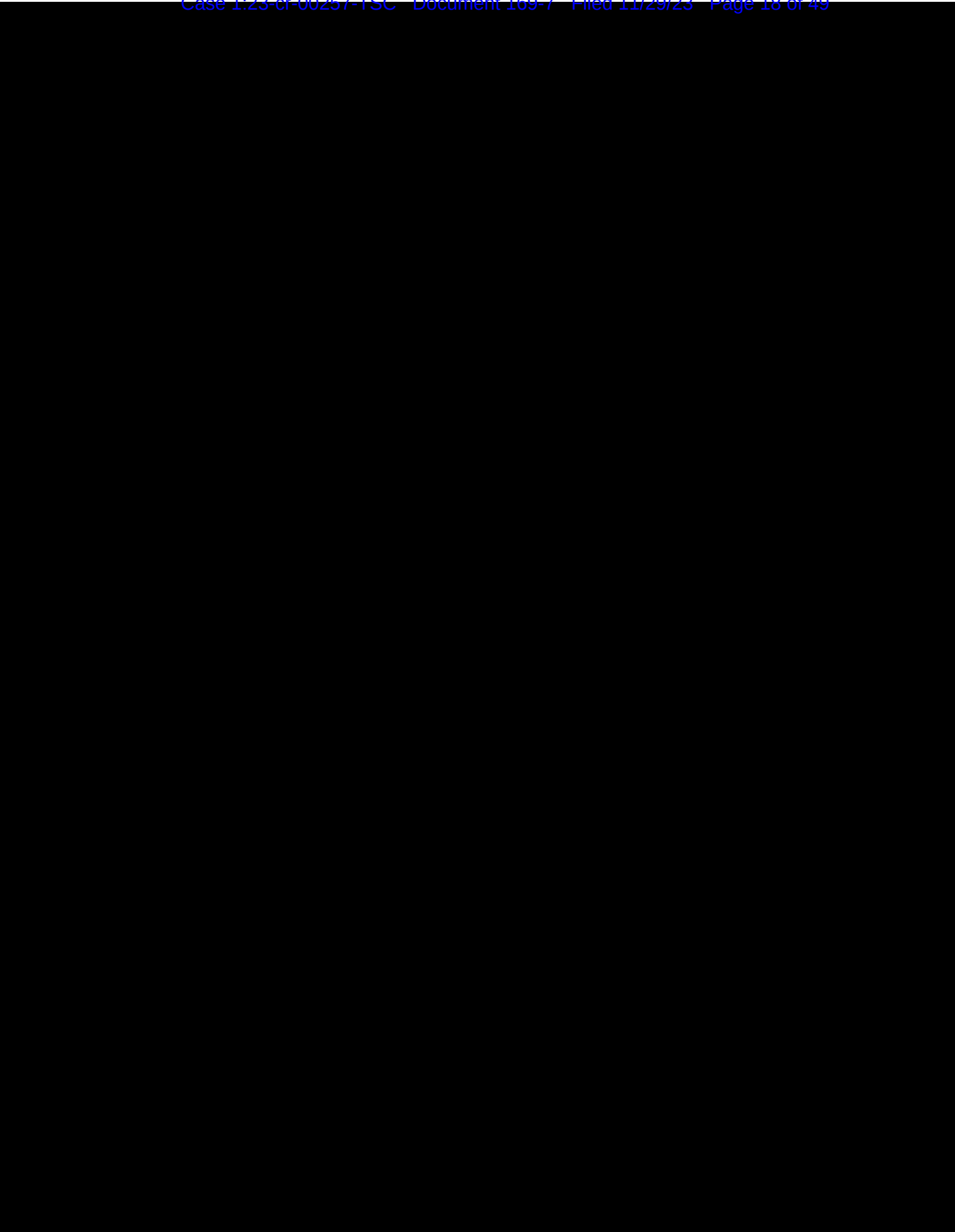




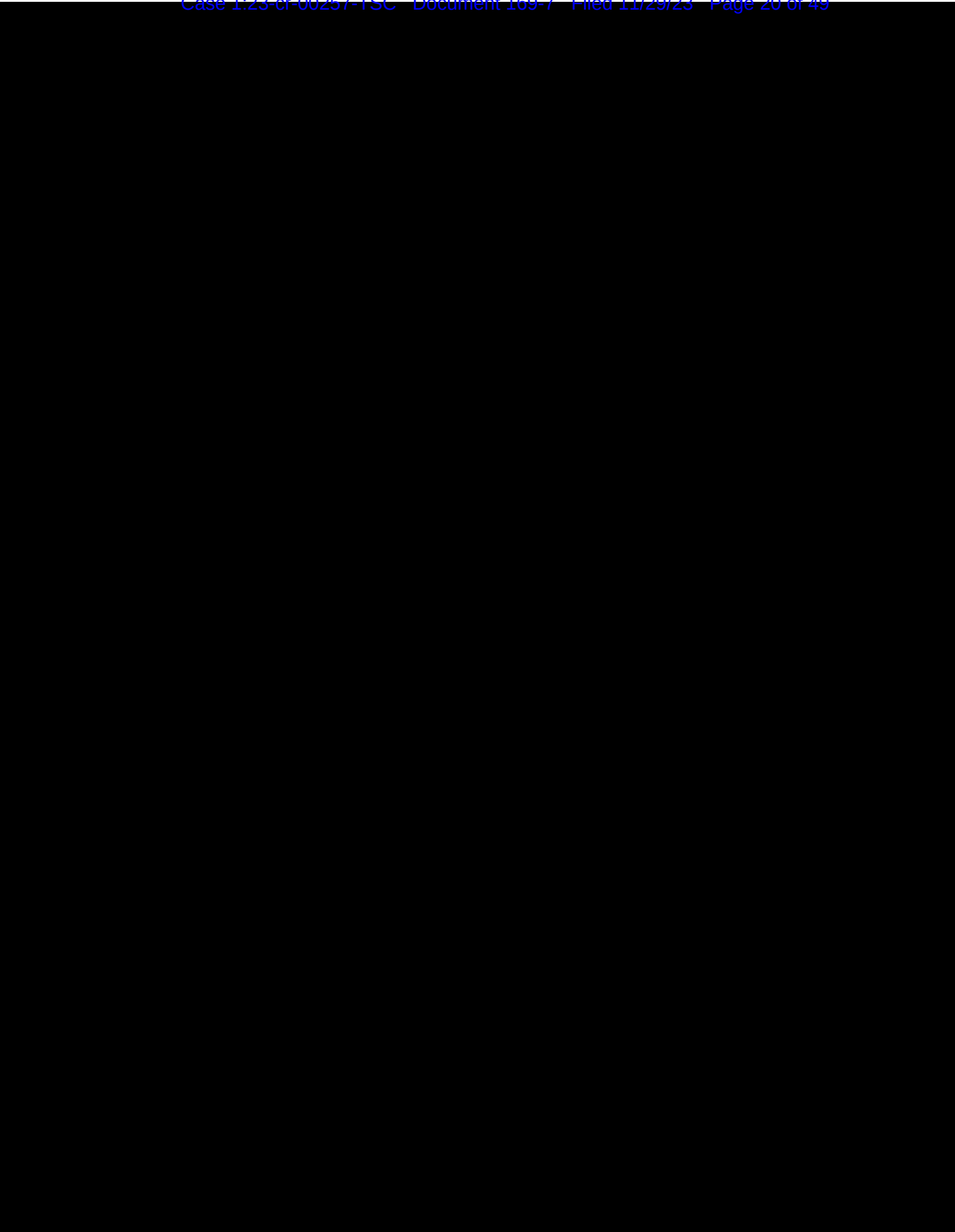


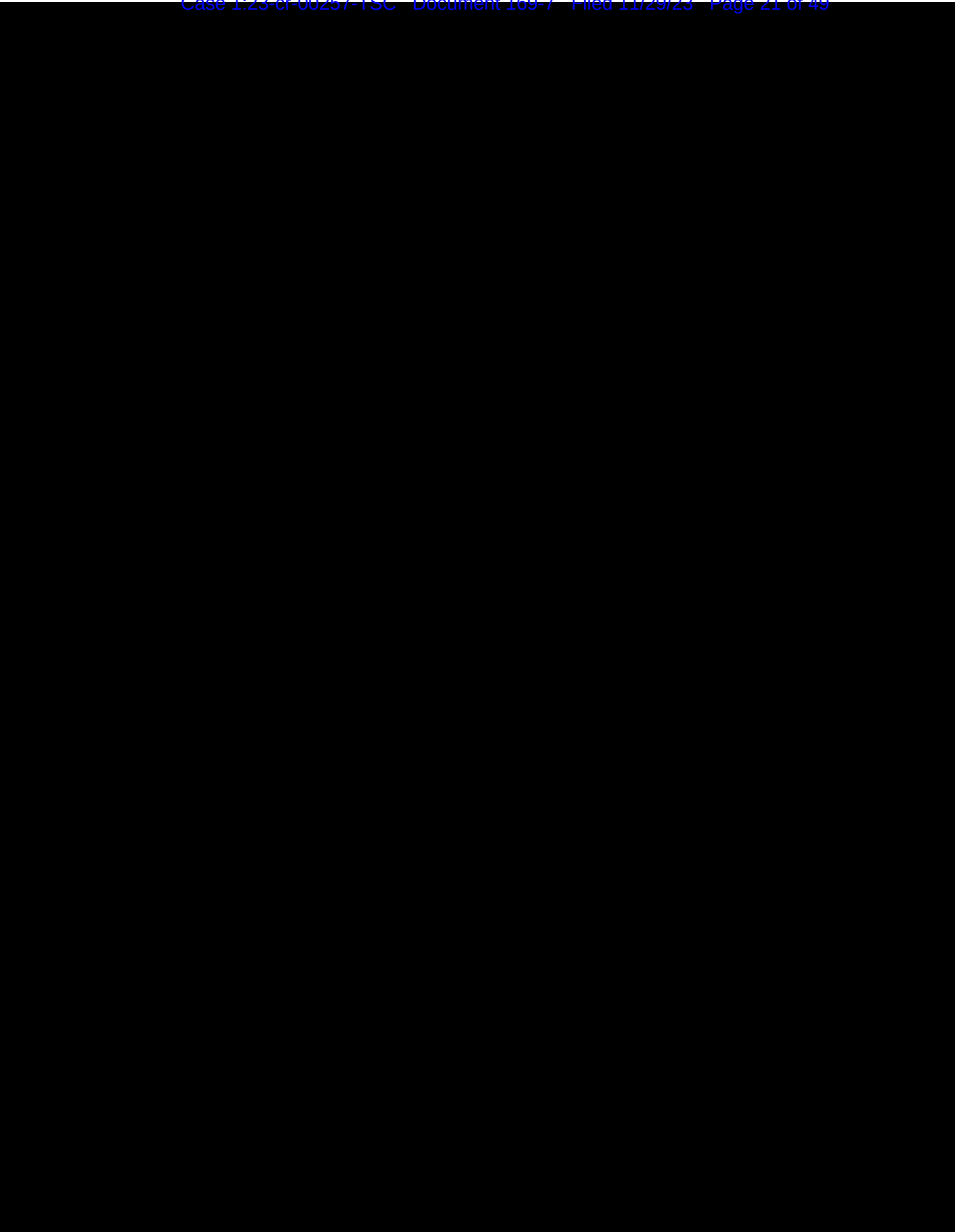




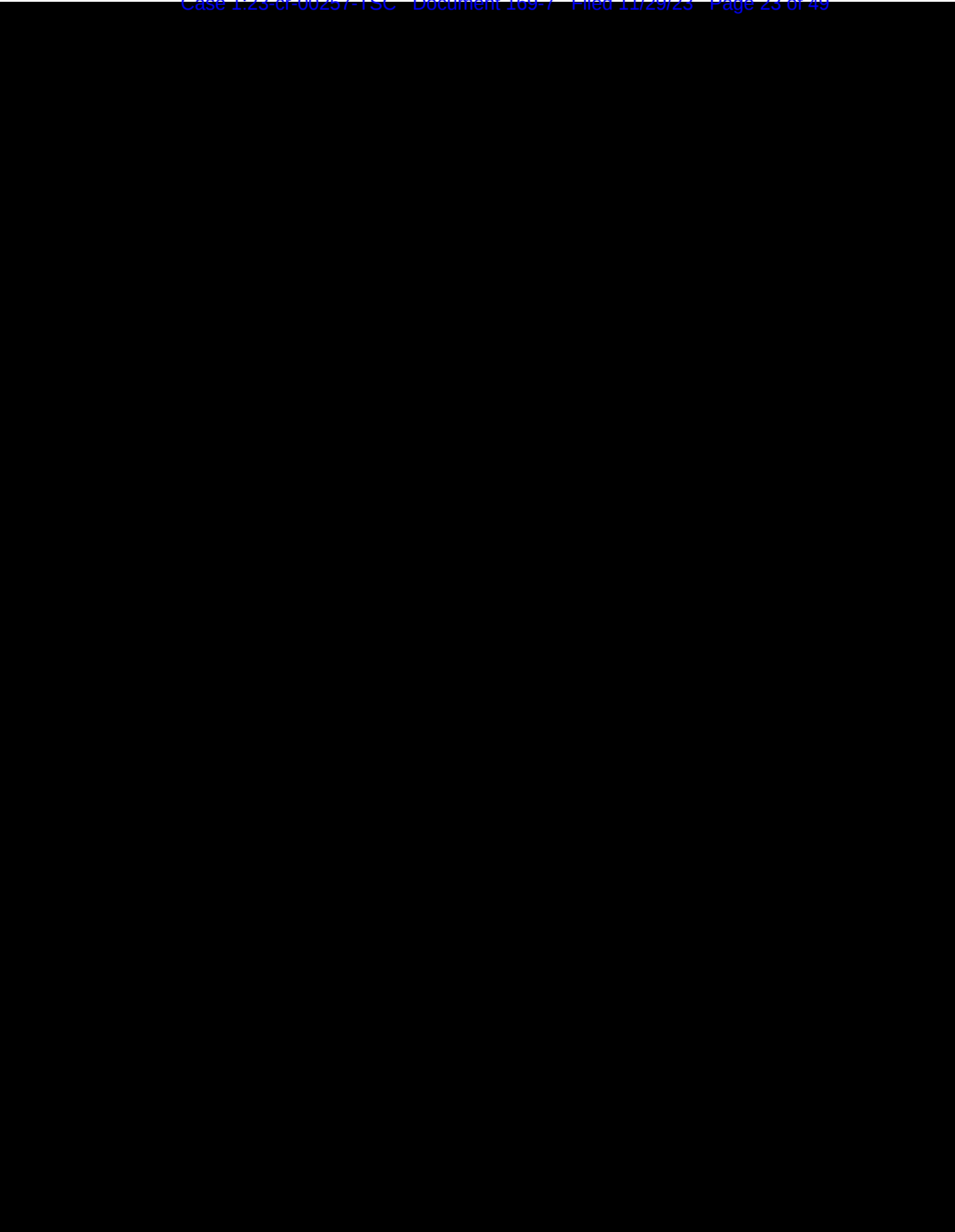




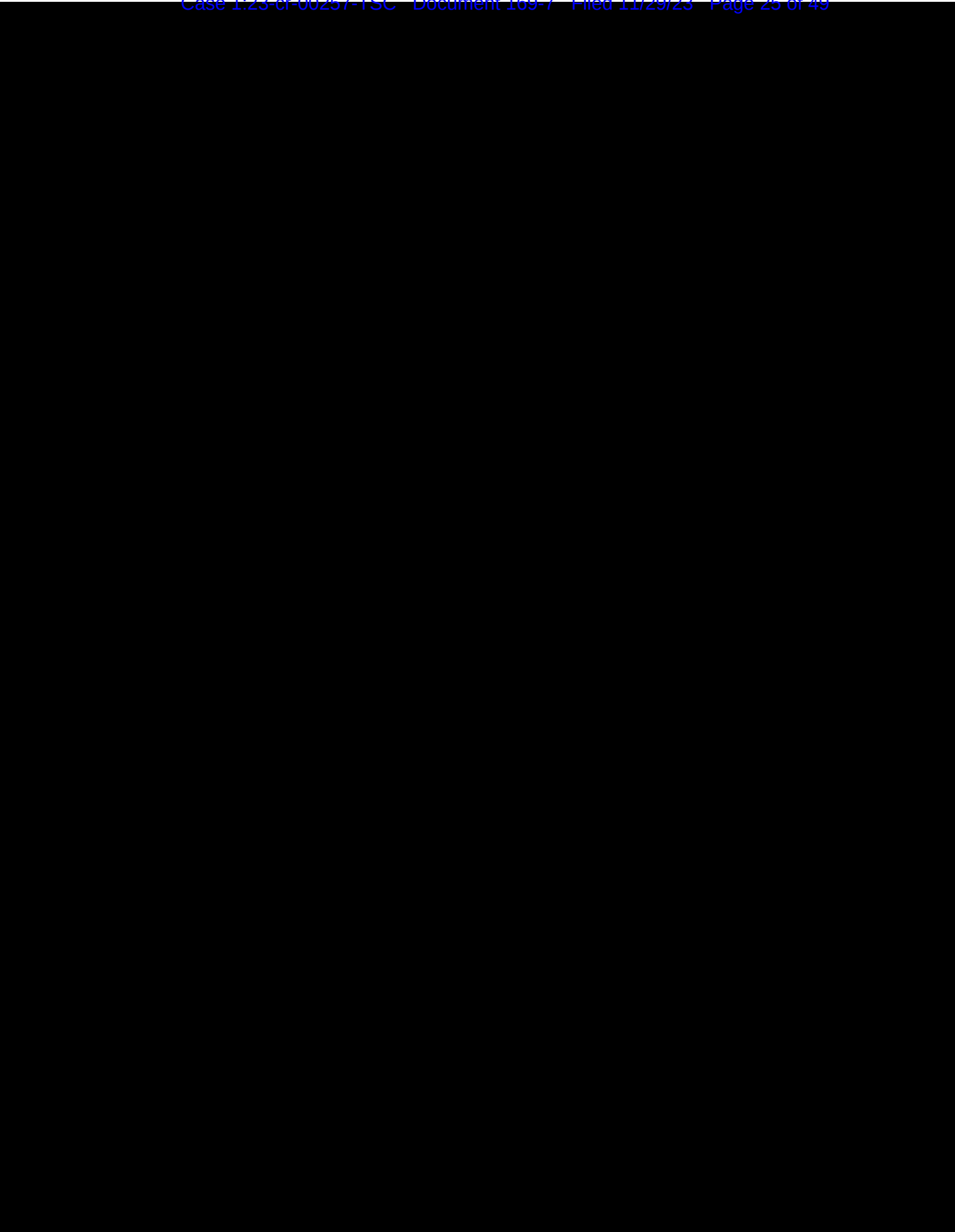


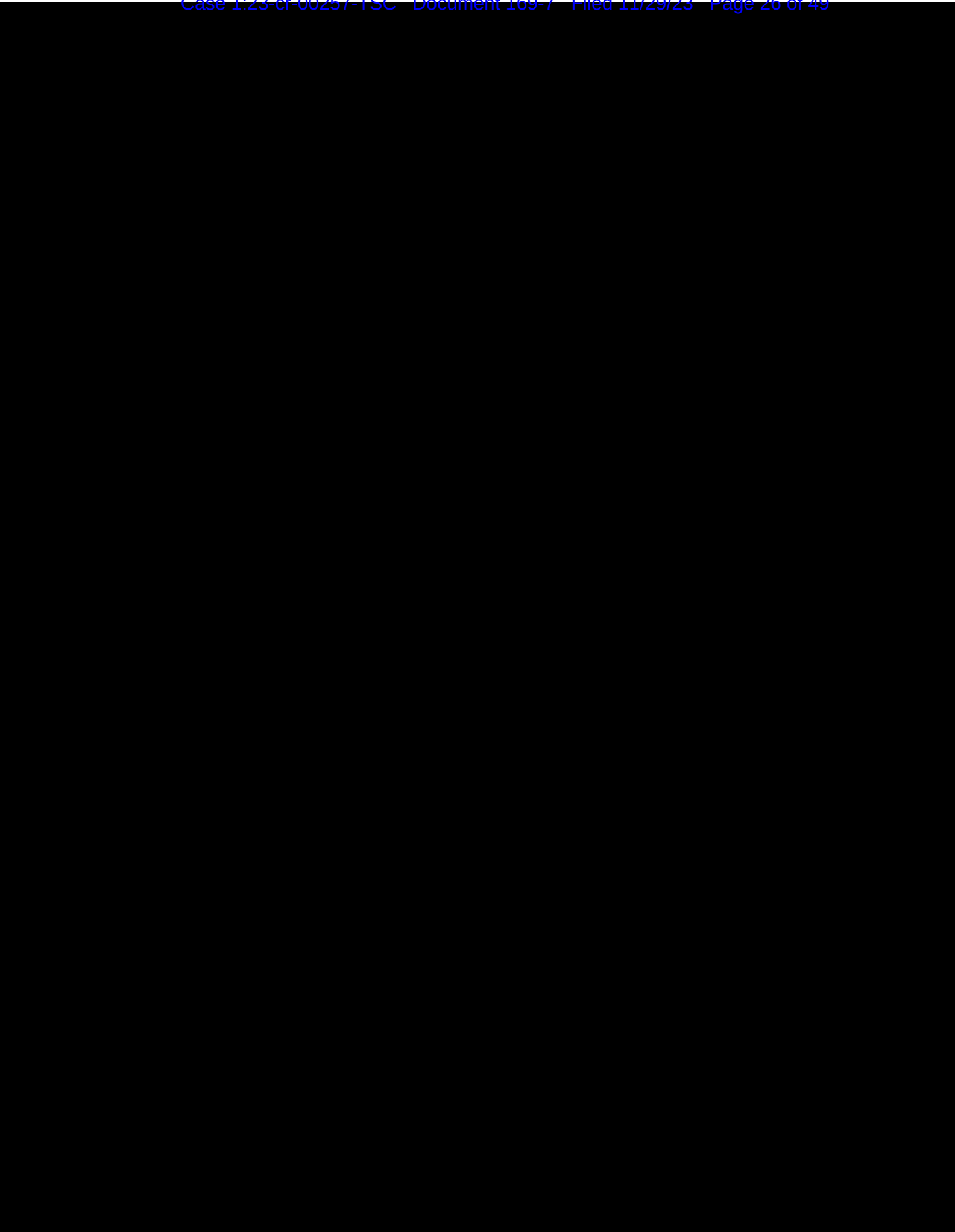


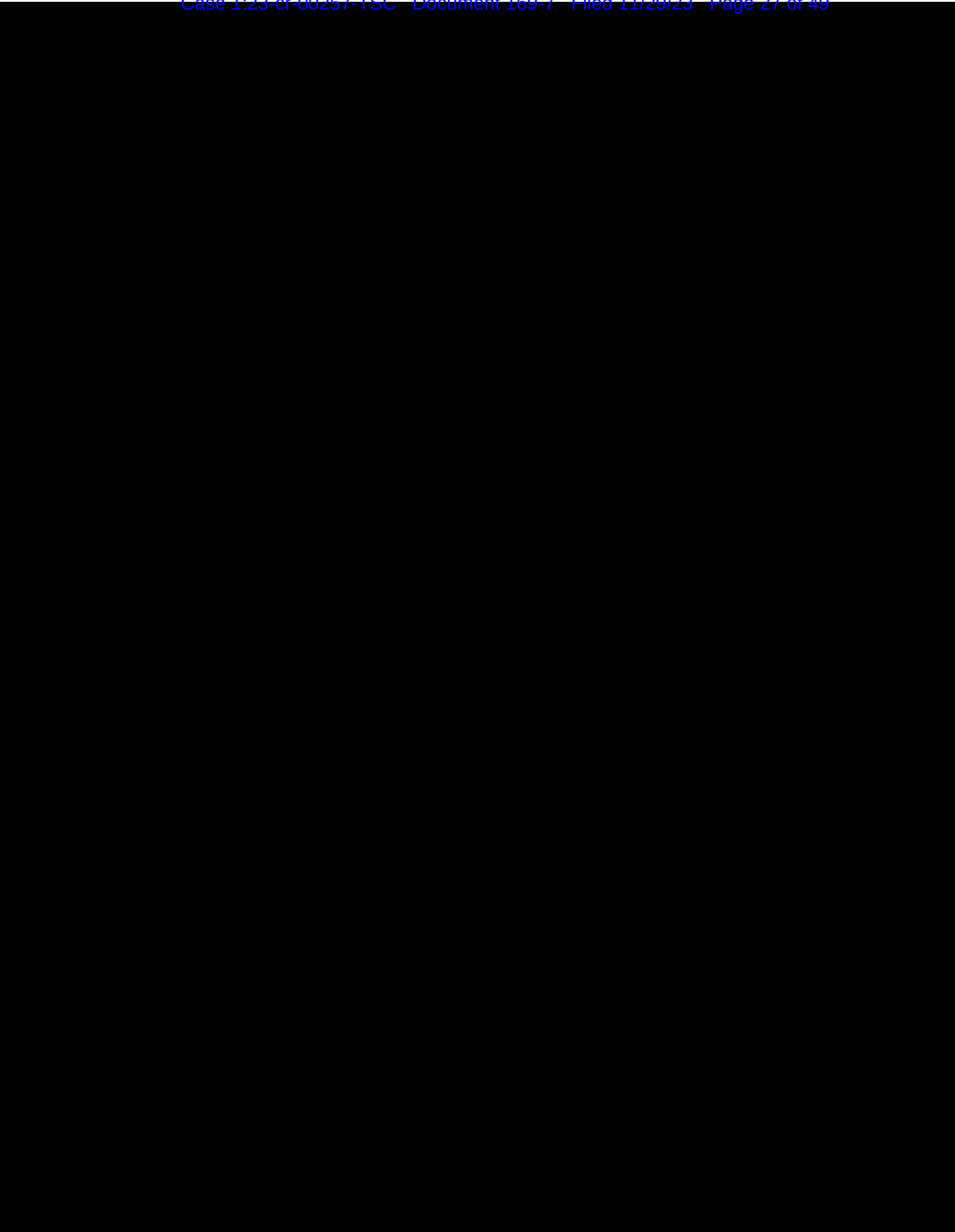


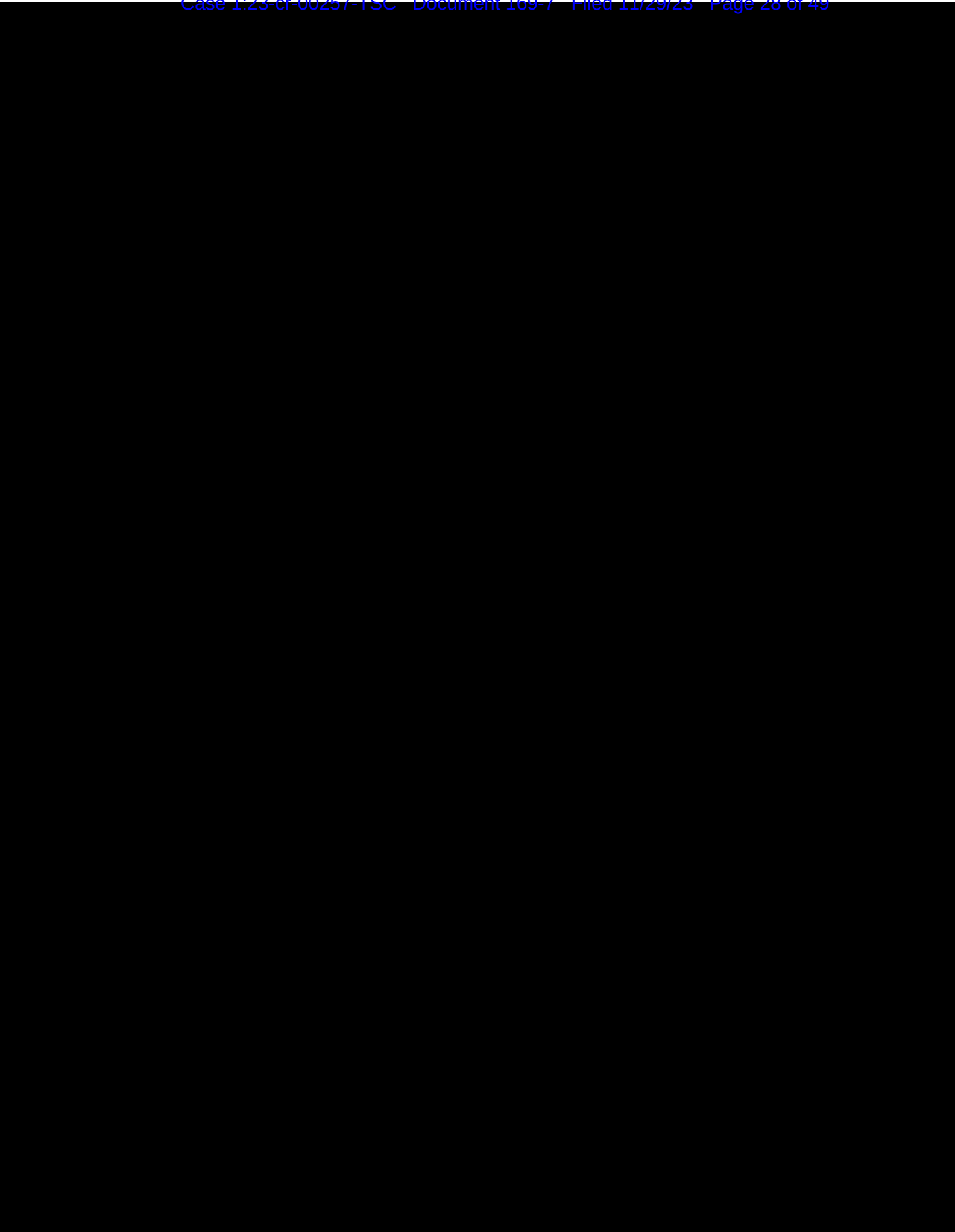


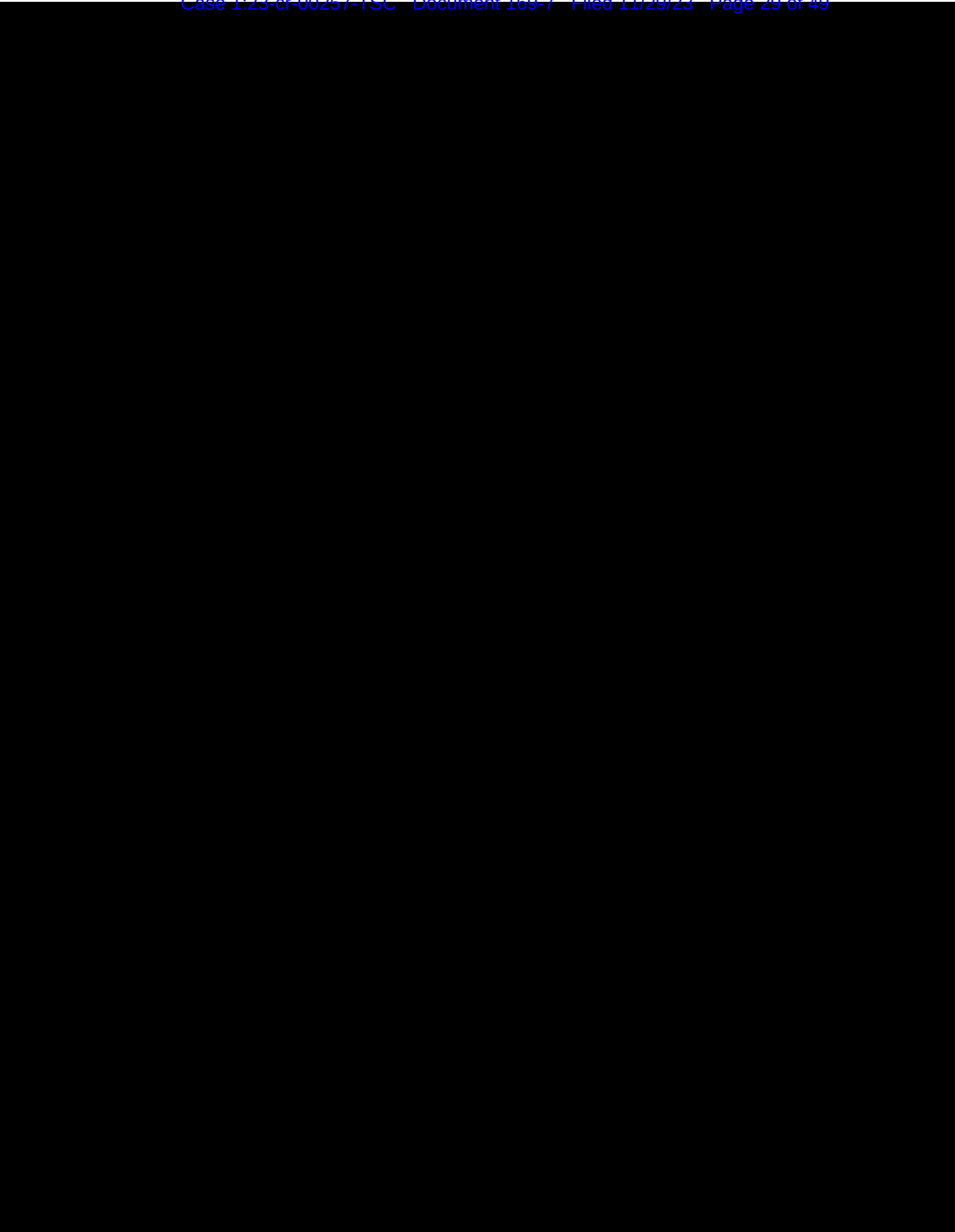


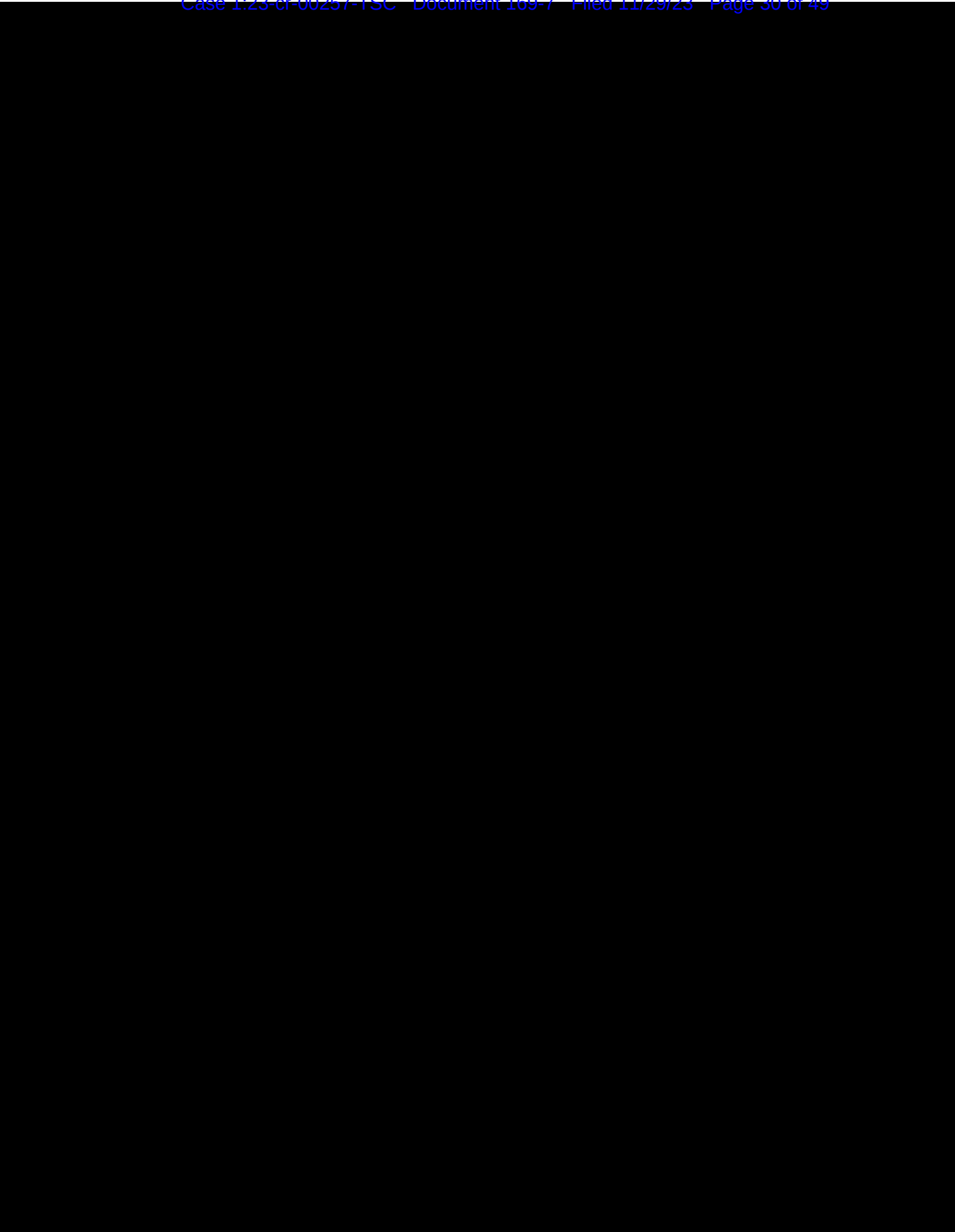




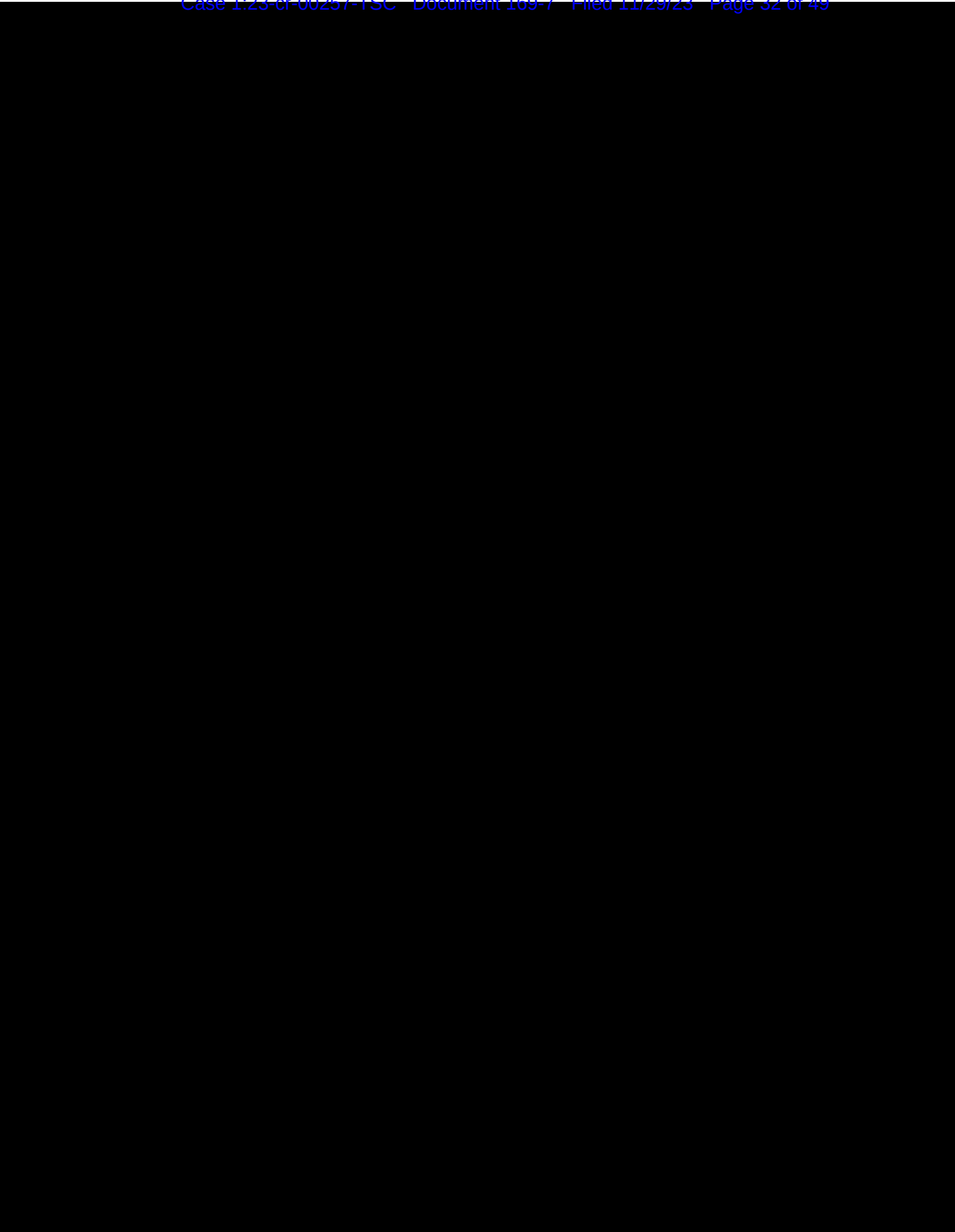






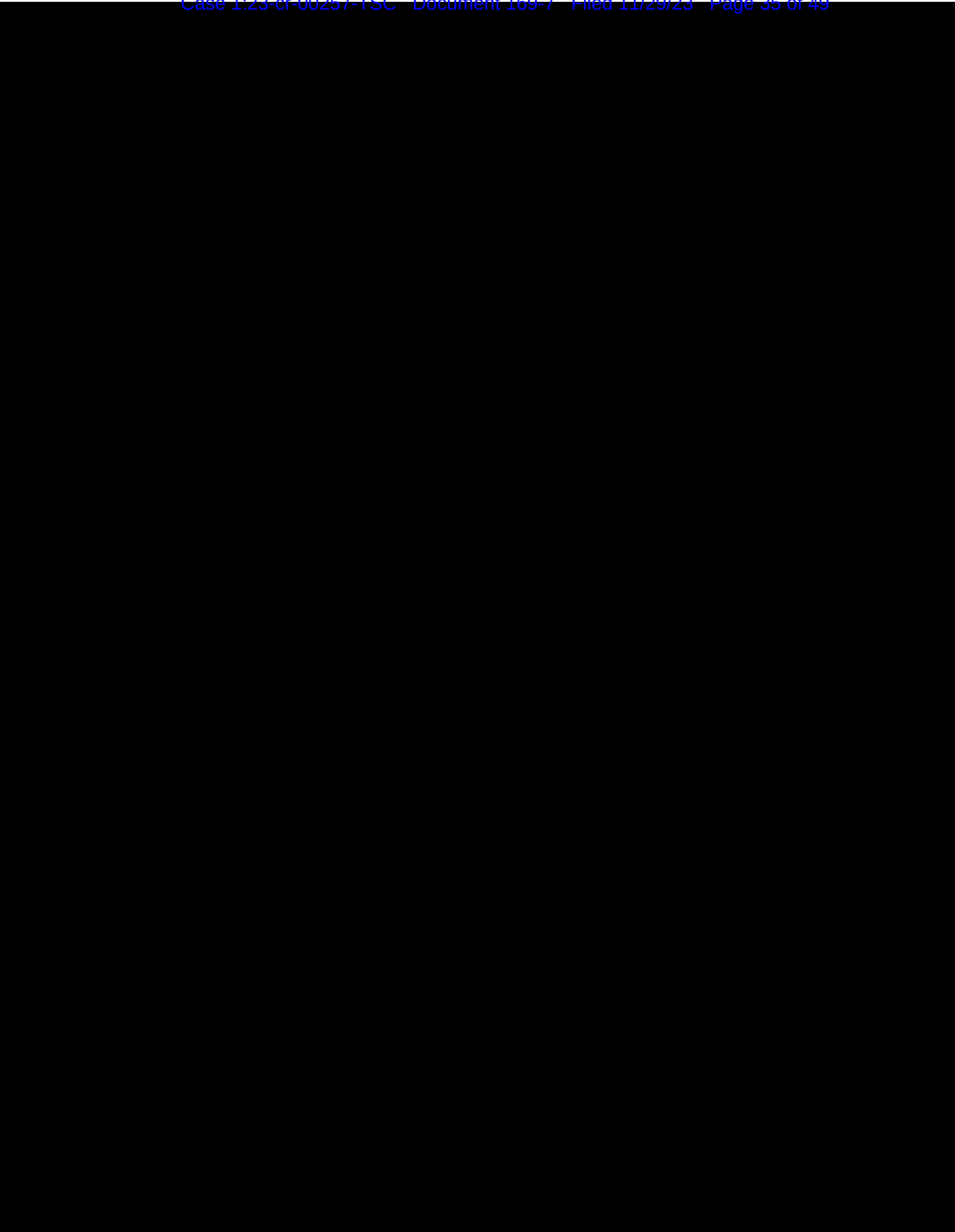


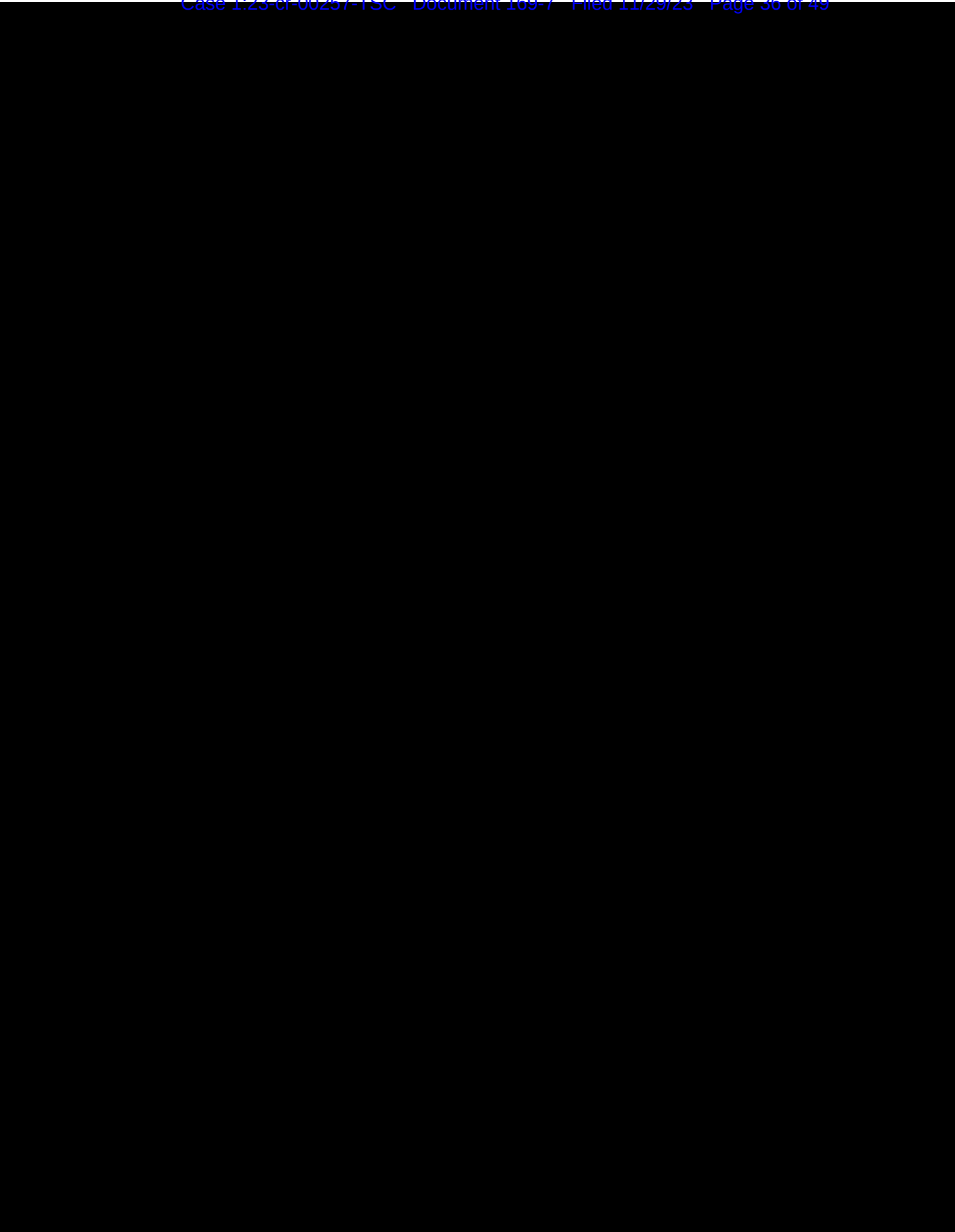


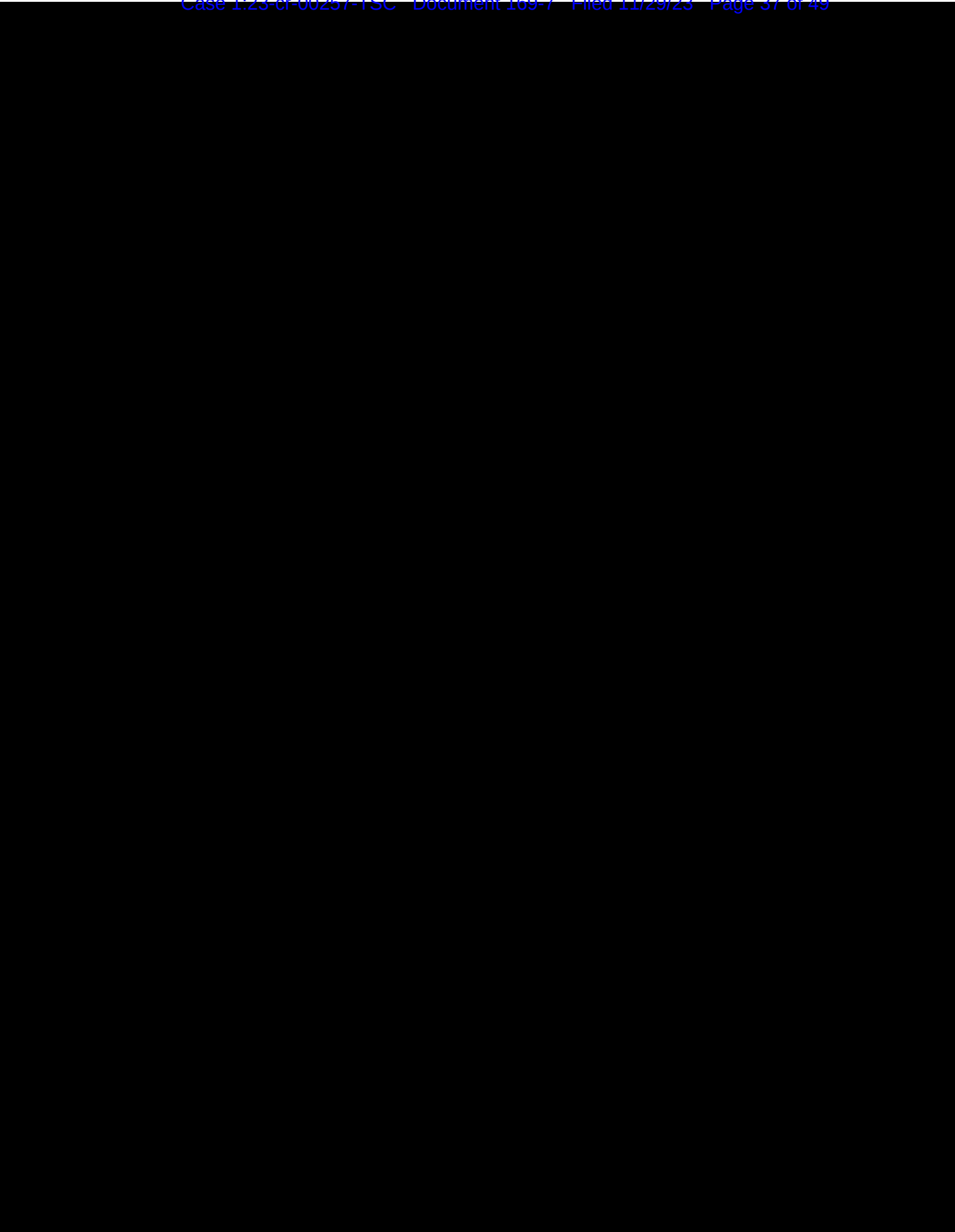


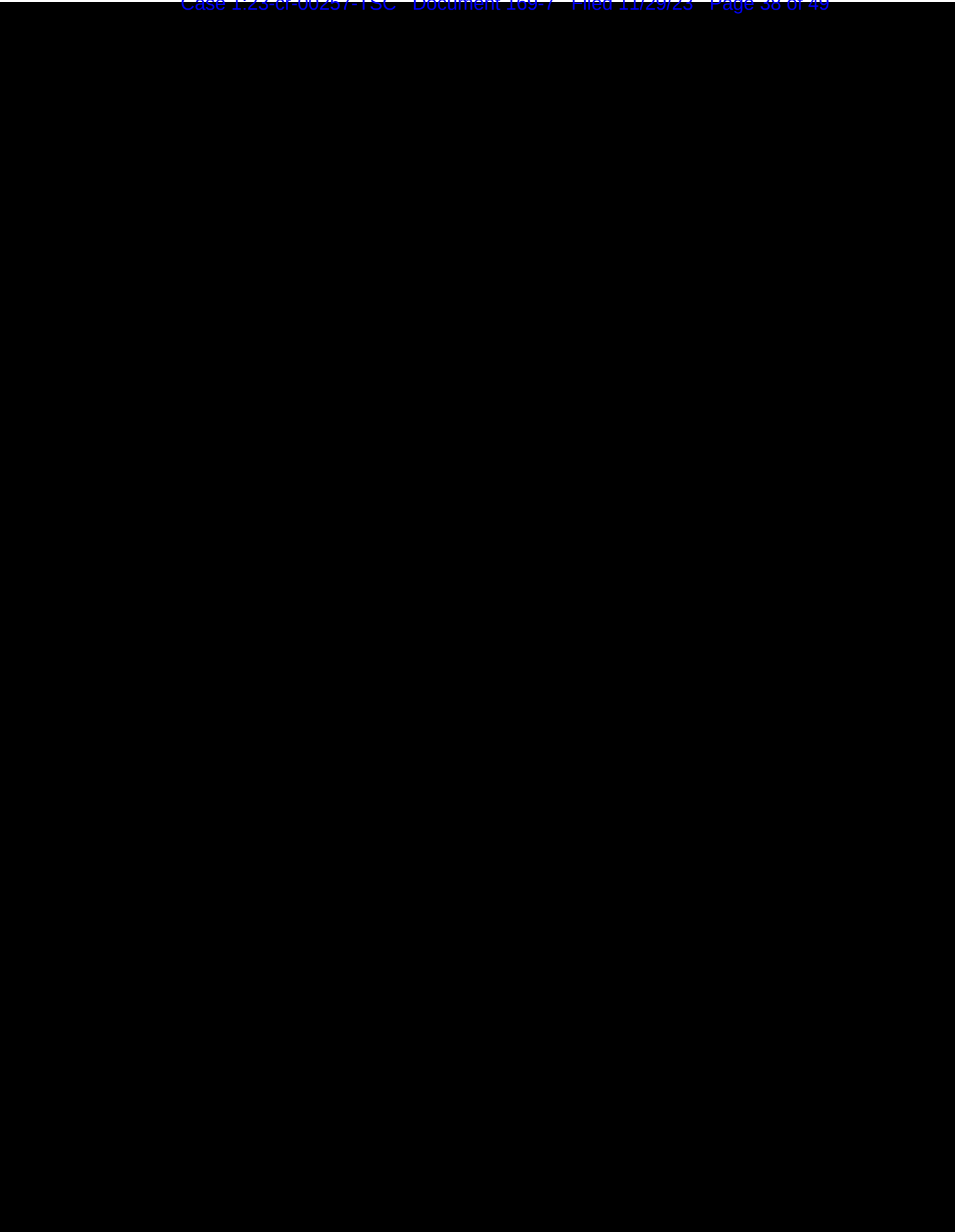




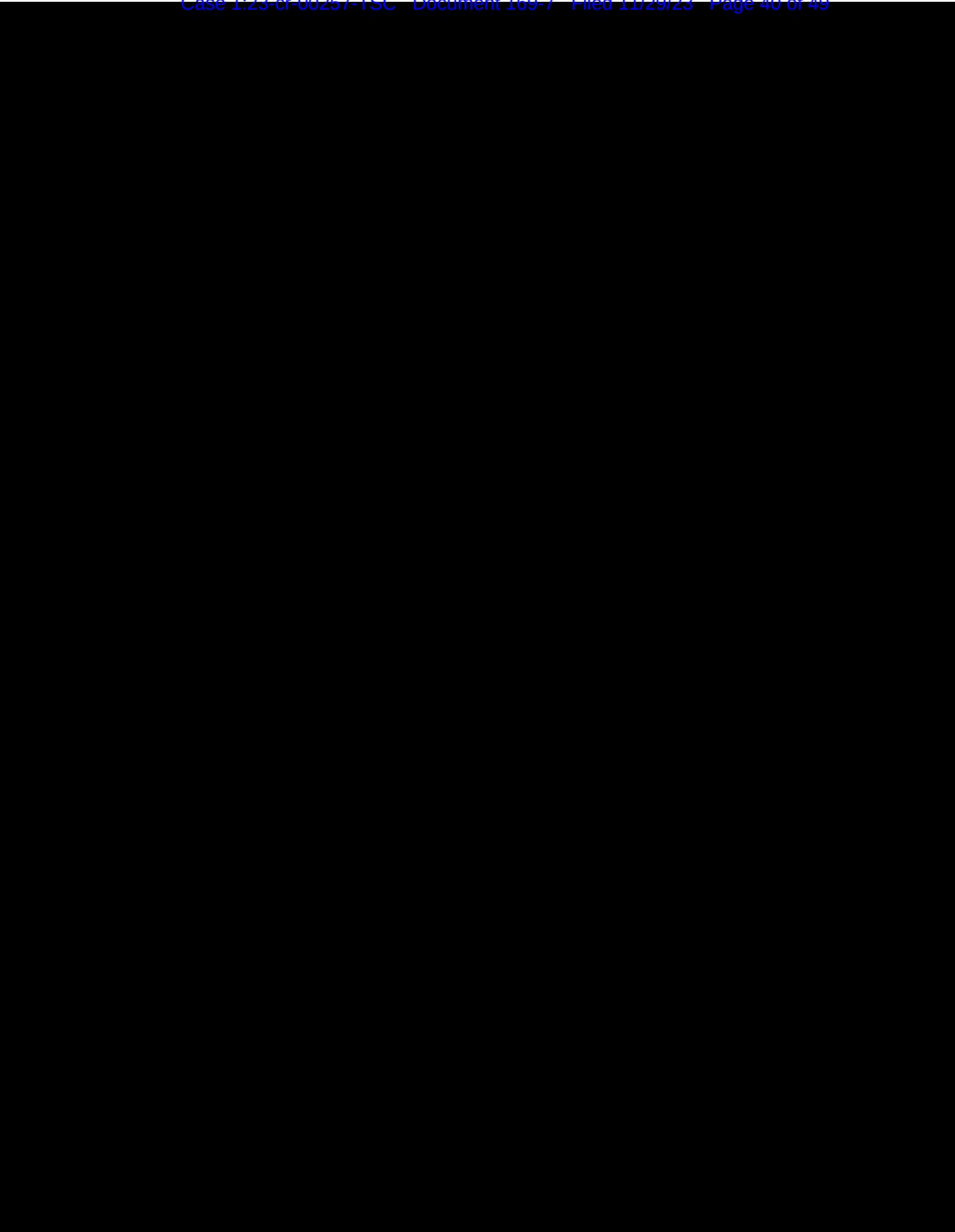


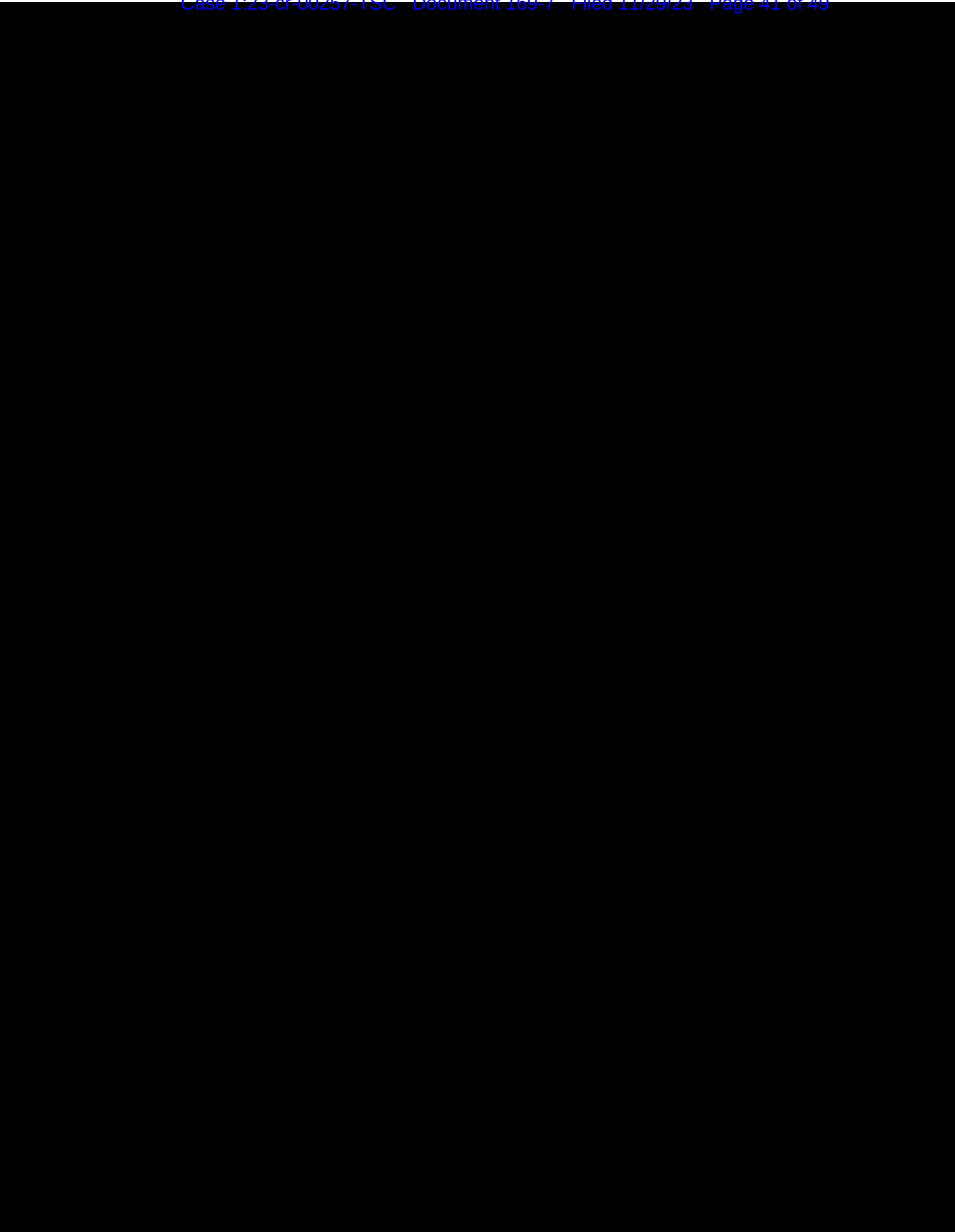




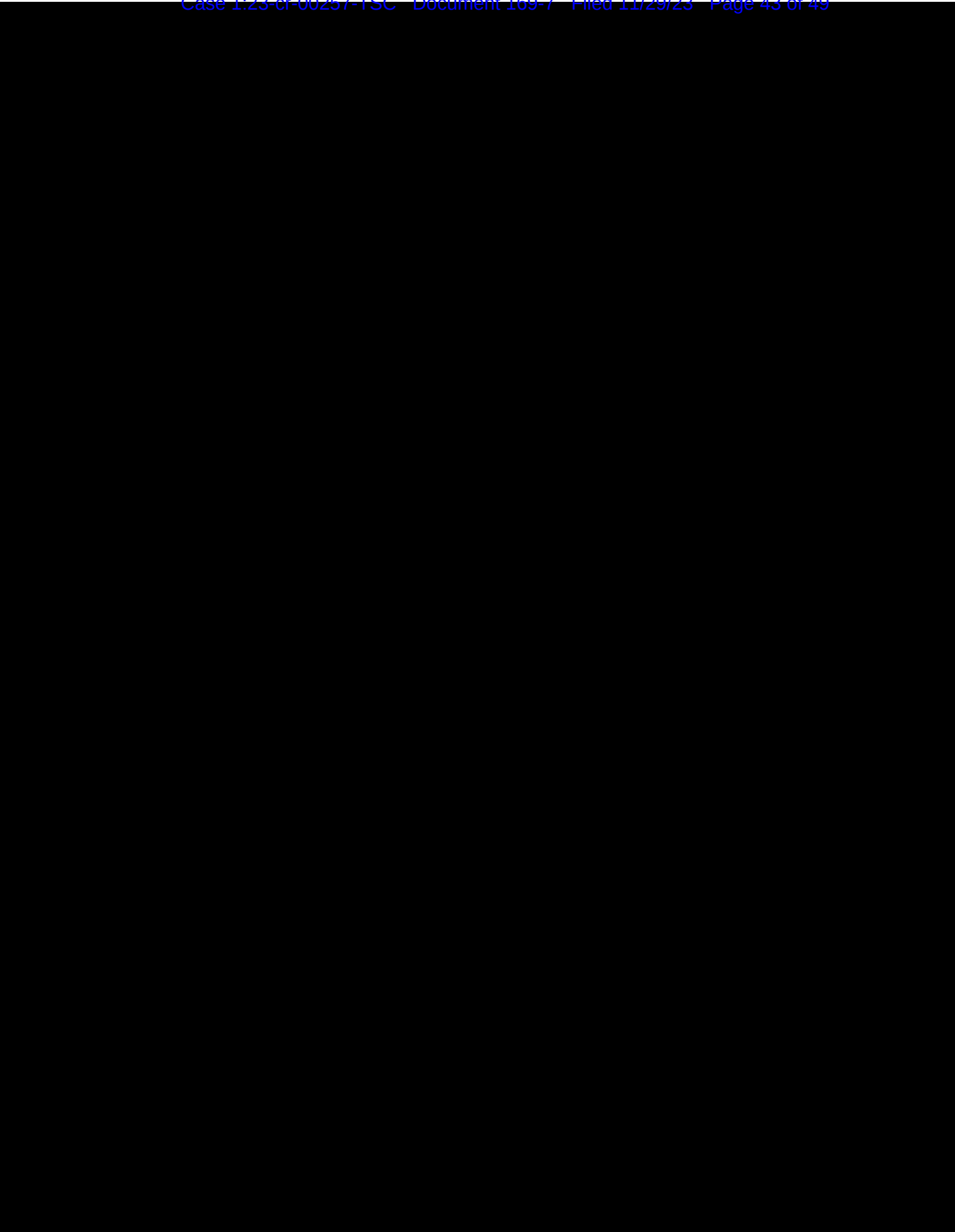




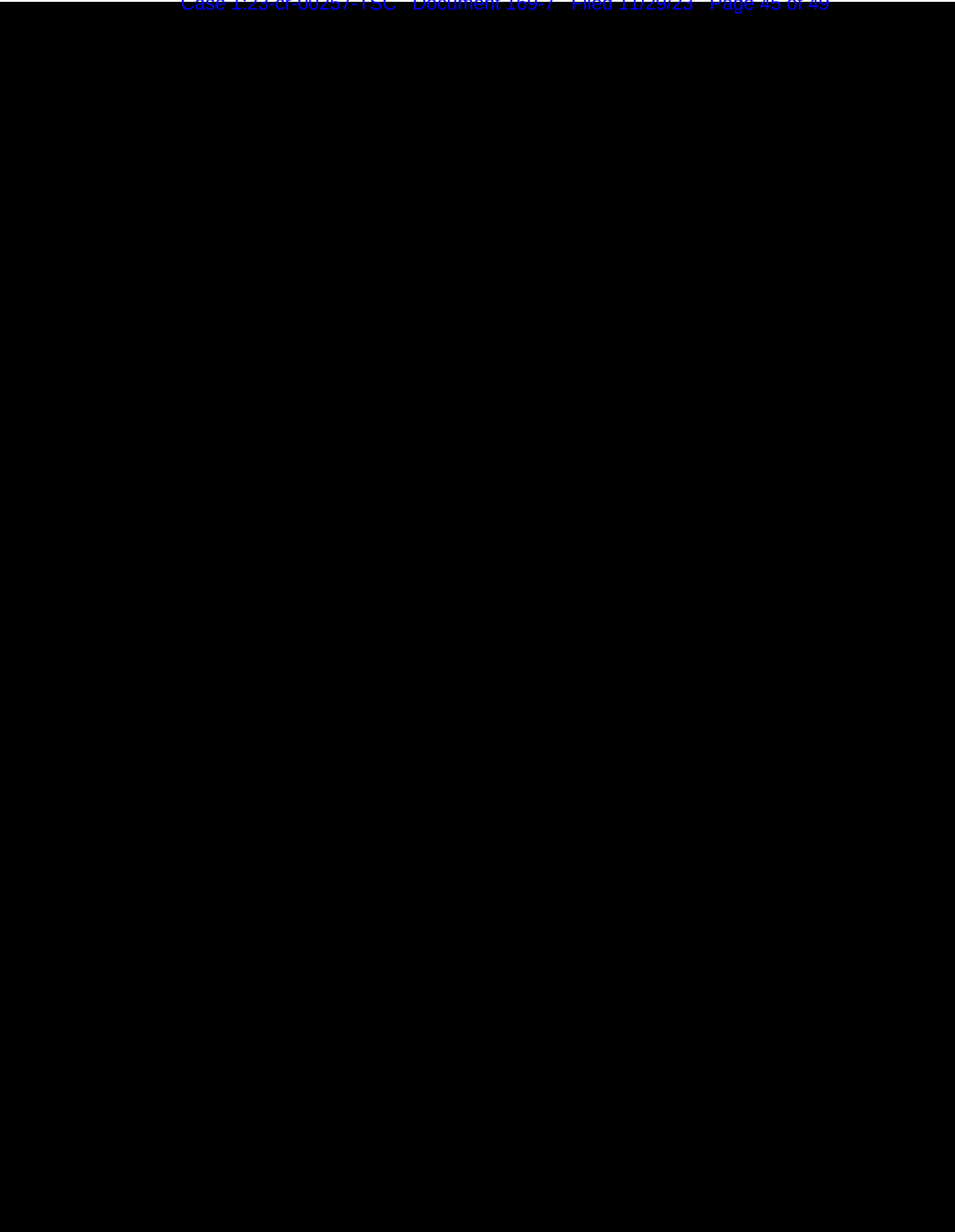






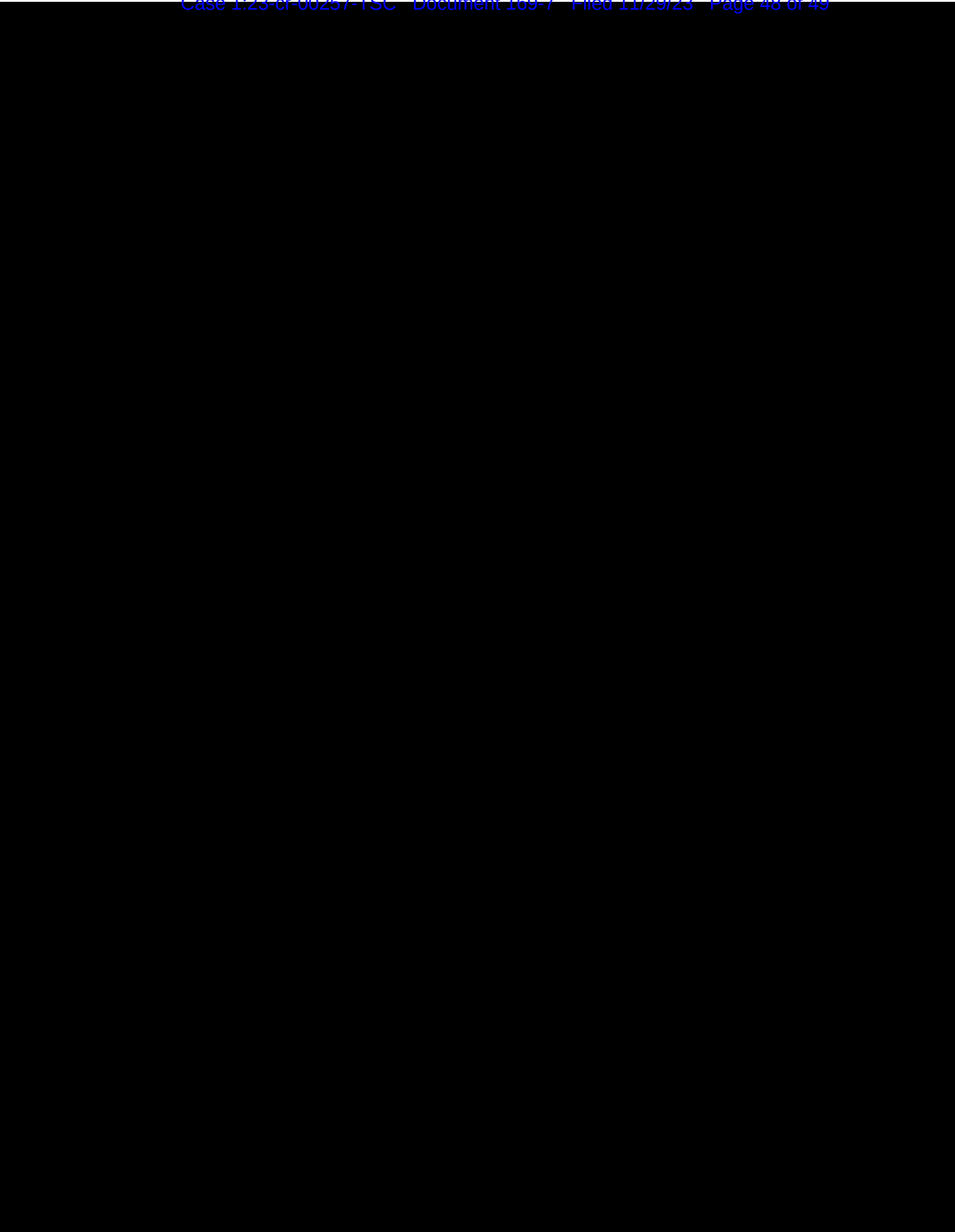














# EXHIBIT H

**FILED UNDER SEAL**

# EXHIBIT I

**FILED UNDER SEAL**

# EXHIBIT J

**FILED UNDER SEAL**

# EXHIBIT K

**FILED UNDER SEAL**

# EXHIBIT L

**FILED UNDER SEAL**

# EXHIBIT M

**FILED UNDER SEAL**

# EXHIBIT N

**FILED UNDER SEAL**

# EXHIBIT O

**FILED UNDER SEAL**