

As Exhibit 1 makes clear, President Trump is not currently seeking access to the actual DC discovery material. Instead, he is seeking a practicable way to determine if any discovery material disclosed in the DC case is arguably relevant to our case, *e.g.*, relating to witnesses the DA's office may call at trial or bearing on factual issues raised by the charges in the indictment likely to be in dispute at trial.

As a starting point to obtain access to DC relevant discovery material, President Trump suggests to the Court and the DA's office the following means to seek the disclosure of the requested discovery letters and itemized lists of discovery:

1. The DA's office contacts the SCO to determine if the SCO will disclose the letters and lists to the DA now that a protective order has been entered in our case.
2. This Court contacts the district court in the DC case to determine if suitable arrangements can be made to disclose the letters and lists to this Court for disclosure to the DA's office and President Trump's undersigned defense counsel.
3. This Court authorizes President Trump to issue subpoenas *duces tecum* to the SCO and DC counsel for the letters and lists.

WHEREFORE, President Trump respectfully requests that the Court hold a hearing on this motion, and if possible, that this motion be added to the December 1, 2023 agenda.

Respectfully submitted,

Steven H. Sadow

STEVEN H. SADOW

Georgia Bar No. 622075

Lead Counsel for Defendant

260 Peachtree Street, N.W.

Suite 2502

Atlanta, Georgia 30303

404-577-1400

stevesadow@gmail.com

Jennifer L. Little

Jennifer L. Little

Georgia Bar No. 141596

Counsel for Defendant

400 Galleria Pkwy

Suite 1920

Atlanta, Georgia 30339

404-947-7778

jlittle@jllaw.com

CERTIFICATE OF SERVICE

I hereby certify I electronically filed the foregoing document with the Clerk of Court using Odyssey Efile Georgia electronic filing system that will send notification of such filing to all parties of record.

This 20th day of November, 2023.

/s/ Steven H. Sadow

STEVEN H. SADOW

EXHIBIT 1

From: Steve Sadow stevesadow@gmail.com 
Subject: Discovery Material - U.S. v. Trump (DC case no. 1:23-cr-00257-TSC)
Date: November 7, 2023 at 9:06 AM
To: Todd Blanche toddblanche@blanchelaw.com, John Lauro jlauro@laurosinger.com
Cc: Jennifer Little jlittle@jllaw.com
Bcc: stevesadow@gmail.com, bepshteyn@gmail.com



Mr. Todd Blanche
Mr. John Lauro
Defense Counsel of Record for President Donald Trump

Gentlemen:

As you know, I am lead counsel for President Trump in the Fulton County, Georgia RICO case (23SC188947). Having reviewed the discovery received from the Fulton County District Attorney's Office, the prosecution in my case, it is clear that relevant material (including FBI Reports of Investigation (302s) and federal grand jury transcripts) related to reasonable foreseeable witnesses common to both of our cases is missing. (This includes named defendants and unindicted co-conspirators in my case who are unindicted co-conspirators in your case.) Indeed, as the Special Counsel's Office noted in their "OPPOSITION TO [President Trump's] MOTION TO DISMISS FOR SELECTIVE AND VINDICTIVE PROSECUTION" filed on November 6, 2023: "As the defendant knows from discovery, the lengthy and thorough investigation involved career prosecutors and professional law enforcement agents interviewing hundreds of witnesses, obtaining and reviewing millions of pages of documents from subpoenas and search warrants,...." [ECF 141 at 12].

(Attached is the State's witness list disclosed prior to the scheduled trial date of co-defendants Powell and Chesebro, who pled guilty just before jury selection commenced - KEEP CONFIDENTIAL.)

To that end, I hereby respectfully request that you provide me a copy of the government's discovery letters, which according to motions filed by the prosecution in your case, contain or have attached itemized lists/logs of discovery provided to the defense. I am NOT seeking the discovery itself at this time. I only seek the discovery letters and lists/logs so I may determine what relevant material has not been provided to me by the prosecution in my case.

Please confirm receipt of this email and attachment, and respond ASAP. Thank you.

Steve Sadow
Steven H. Sadow, P.C.
Lead Counsel for President Trump
GA Bar No. 622075
260 Peachtree St. NW
Suite 2502
Atlanta, GA 30303
404-577-1400 (office)
404-242-9440 (cell)

**23SC888947 STATE WITNESS
LIST 10-10-2023.pdf**



EXHIBIT 2
(UNDER SEAL)

EXHIBIT 3

From: Nancy Tersigni ntersigni@laurosinger.com 
Subject: From John Lauro / U.S. v. Trump
Date: November 10, 2023 at 7:07 AM
To: stevesadow@gmail.com
Cc: John Lauro jlauro@laurosinger.com, toddblanche@blanchelaw.com



Good morning, Mr. Sadow: Mr. Lauro asked that I send the email below along with the attached.

Dear Steve:

We are in receipt of your email dated November 7, 2023, requesting information relative to the federal case we are handling for President Trump in DC. Please understand that, despite our opposition, the Court entered a protective order (attached) that appears to restrict our ability to share information with others - including President Trump's counsel in other cases. As such, we are not able to share information designated by the federal prosecutors as "sensitive." Unfortunately, we believe that the information you have requested may be covered by the order and therefore we cannot share it with you. If you need any further information, please let us know.

John

***Please mail all correspondence to our Tampa office.**

Nancy A. Tersigni
Firm Administrator
ntersigni@laurosinger.com

Tampa 400 N. Tampa St. 15th Floor|Tampa, FL 33602
T 813.222.8990 **F** 813.222.8991
Miami 1101 Brickell Ave. 8th Floor|Miami, FL 33131
New York 250 E. 53rd St. #1701|New York, NY 10022
laurosinger.com

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FLORIDA ♦ NEW YORK

IMPORTANT: The contents of this email and any attachments are confidential. It is strictly forbidden to share any part of this message with any third party, without a written consent of the sender. If you received this message by mistake, please reply to this message and follow with its deletion, so that we can ensure such a mistake does not occur in the future.

Protective Order[68][13].pdf



EXHIBIT 4

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,

v.

DONALD J. TRUMP,

Defendant.

Criminal Action No. 23-00257 (TSC)

**PROTECTIVE ORDER GOVERNING DISCOVERY AND AUTHORIZING
DISCLOSURE OF GRAND JURY TESTIMONY**

The United States has moved for entry of a Protective Order that would govern discovery in this matter. To expedite the flow of discovery material between the parties and to adequately protect certain information that the United States intends to produce to the defendant, the Government's motion is **GRANTED in part and DENIED in part** and, pursuant to the court's authority under Federal Rule of Criminal Procedure 16(d)(1), it is hereby **ORDERED**:

No Limit on Already Possessed or Public Documents

1. This Protective Order ("Order") does not apply to information or records that are publicly available independent of the Government's productions, nor does it apply to information or records which the defendant or defense counsel came into possession by independent means, unrelated to the discovery process.

Sensitive Materials

2. Sensitive Materials, which the United States may designate in accordance with paragraph 8, below, are subject to this Order and may be used by the defendant and defense counsel (defined as counsel of record in this case) solely in connection with the defense of this

case, and for no other purpose, and in connection with no other proceeding, without further order of this court.

3. The defendant and defense counsel shall not disclose Sensitive Materials or their contents directly or indirectly to any person or entity other than persons employed to assist in the defense, persons who are interviewed as potential witnesses, counsel for potential witnesses, and other persons to whom the court may authorize disclosure (collectively, "Authorized Persons"). Potential witnesses and their counsel may be shown copies of Sensitive Materials as necessary to prepare the defense, but they may not retain copies without prior permission of the court.

4. The defendant, defense counsel, and Authorized Persons shall not copy or reproduce Sensitive Materials except to provide copies of Sensitive Materials for use in connection with this case by the defendant, defense counsel, and Authorized Persons. Such copies and reproductions shall be treated in the same manner as the original. The defendant, defense counsel, and Authorized Persons shall not disclose any notes or records of any kind that they make in relation to the contents of Sensitive Materials, other than to Authorized Persons, and all such notes or records are to be treated in the same manner as the original; provided, however, this paragraph shall not apply to generalized mental impressions of Authorized Persons, not reflecting the content of Sensitive Materials.

5. Before providing any Sensitive Materials to an Authorized Person(s), defense counsel must provide the Authorized Person(s) with a copy of this Order and the Authorized Person(s) must agree in writing to abide by this Order.

6. Upon conclusion of all stages of this case, all Sensitive Materials and all copies made thereof shall be destroyed or returned to the United States, unless otherwise ordered by the court. The court may require a certification as to the disposition of Sensitive Materials; provided, however, this paragraph shall not apply to any work product, notes, or other documents

reflecting the content of Sensitive Materials.

7. The restrictions set forth in this Order do not apply to documents that are or become part of the public record, including documents that have been received in evidence at other trials, nor do the restrictions in this Order limit defense counsel in the use of Sensitive Materials in judicial proceedings in this case, except as described below.

8. The United States may designate the following materials it produces to defense counsel as “Sensitive Materials”:

- a. Materials containing personally identifying information as identified in Federal Rule of Criminal Procedure 49.1;
- b. Rule 6 materials, including grand jury subpoena returns, witness testimony, and related exhibits presented to the grand jury;
- c. Materials obtained through sealed search warrants and 2703(d) orders;
- d. Sealed orders obtained by the Government’s filter team related to this case;
- e. Recordings, transcripts, interview reports, and related exhibits of witness interviews; and
- f. Materials obtained from other governmental entities.

The Government shall indicate to defense counsel, in discovery correspondence or otherwise, which materials constitute Sensitive Materials prior to or concurrent with disclosure.

9. Except as provided in this Order, without prior notice to the United States and authorization from the court, no Sensitive Materials, or information contained therein, may be disclosed to any person other than the defendant, defense counsel, persons employed to assist the defense, or the person to whom the sensitive information solely and directly pertains and that person’s counsel.

10. Sensitive Materials must be maintained in the custody and control of defense counsel. Defense counsel may show or provide Sensitive Materials to the defendant as necessary

to assist in preparation of the defense, and defense counsel is not required to be present while the defendant reviews Sensitive Materials. However, if defense counsel does show or provide Sensitive Materials to the defendant, defense counsel may not allow the defendant to write down any personally identifying information as identified in Federal Rule of Criminal Procedure 49.1 that is contained in the Sensitive Materials. If the defendant takes notes regarding Sensitive Materials, defense counsel must inspect those notes to ensure that the defendant has not copied down personally identifying information as identified in Federal Rule of Criminal Procedure 49.1. Moreover, during any time that the defendant reviews Sensitive Materials outside of defense counsel's presence, the defendant must not have access to any device capable of photocopying, recording, or otherwise replicating the Sensitive Materials, including a smart cellular device. Defense counsel must also ensure that all Sensitive Materials are collected and safeguarded when the defendant is no longer reviewing them.

11. The parties may include designated Sensitive Materials in any public filing or use designated Sensitive Materials during any hearing or the trial of this matter without leave of court if all sensitive information is redacted, and the parties have previously conferred and agreed to the redactions. No party shall disclose unredacted Sensitive Materials in open court or public filings without prior authorization by the court (except if the defendant chooses to include in a public document Sensitive Materials relating solely and directly to the defendant's personally identifying information). If a party includes unredacted Sensitive Materials in any filing with the court, they shall be submitted under seal.

12. Any filing under seal must be accompanied by a motion for leave to file under seal as required by Local Rule of Criminal Procedure 49(f)(6)(i), as well as a redacted copy of any included Sensitive Materials for the Clerk of the Court to file on the public docket if the court were to grant the motion for leave to file under seal.

Scope of this Order

13. **Modification Permitted.** Nothing in this Order shall prevent any party from seeking modification of this Order or from objecting to discovery that it believes to be otherwise improper.

14. **No Waiver.** The failure by the United States to designate any of the Materials as “Sensitive” upon disclosure shall not constitute a waiver of the United States’ ability to later designate the Materials as Sensitive.

15. **No Ruling on Discoverability or Admissibility.** This Order does not constitute a ruling on the question whether any particular material is properly discoverable or admissible and does not constitute any ruling on any potential objection to the discoverability of any material.

16. **Challenges to Specific Documents.** The defendant may raise particularized concerns about specific documents by motion to this court.

Date: August 11, 2023

Tanya S. Chutkan
TANYA S. CHUTKAN
United States District Judge