

EXHIBIT G

(Redacted)



U.S. Department of Justice

Special Counsel's Office

August 11, 2023

Todd Blanche, Esq. (*via email*: toddblanche@blanchelaw.com)
Blanche Law
99 Wall Street, Suite 4460
New York, NY 10005

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

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:¹

- 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

¹ 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.

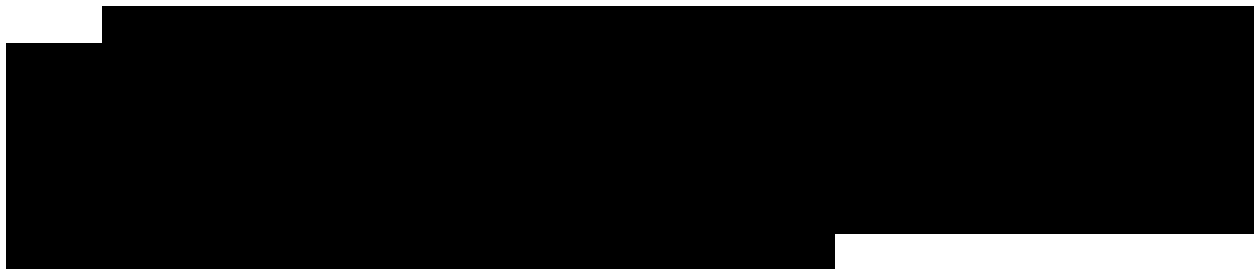
Please note that there will be additional productions of discovery. For example, the Government is still processing some devices and search warrant returns. We will disclose the responsive material promptly upon completion of that process, which we expect to be in the near term.

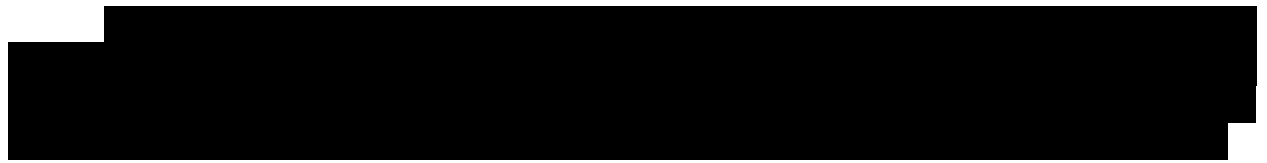
Scope of Discovery

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:

