

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

CASE NO. 23-80101-CR-CANNON

UNITED STATES OF AMERICA,

v.

**DONALD J. TRUMP,
WALTINE NAUTA, and
CARLOS DE OLIVEIRA,**

Defendants.

/

NOTICE OF COMPLIANCE

Defendant Waltine Nauta, by and through the undersigned counsel, and pursuant to the Court's May 30, 2024, Paperless Show Cause Order (ECF No. 589), as well as the Court's June 3, 2024, Paperless Order (ECF No. 599), hereby provides the foregoing written response regarding why docket entry 138 had not been filed on the public docket by May 28, 2024, as instructed by the Court in its May 21, 2024, Paperless Order (ECF No. 558).

Mr. Nauta's lead defense counsel, Stanley Woodward, accepts full responsibility for, and regrets, the unintentional error in failing to comply with the Court's deadline for submitting a redacted copy of docket entry 138 as instructed by the Court in its May 21, 2024, Paperless Order (ECF No. 558). This inadvertent oversight will not reoccur.

By way only of explanation, defense counsel recognizes the significant effort by all involved in this action to manage the flurry of activity in this matter concerning the voluminous unsealing that has occurred in the past two (2) months. In that time, eleven (11) separate Orders

concerning the complete or partial unsealing of twenty-five (25) total filings, have issued.¹ Mr. Nauta specifically was required to ensure eleven (11) separate filings were docketed with redactions, and thus available to the public, with corresponding unredacted sealed submissions and accompanying notices cross-referencing each. *See* Redacted Mot. Bill of Particulars (April 11, 2024) (ECF No. 446) (originally submitted *in camera* Feb. 22, 2024); Redacted Notice of Compliance (by docketing Grand Jury Tr.) (April 29, 2024) (ECF No. 495); Redacted Reply Memo. in Support of Mot. (April 11, 2024) (ECF No. 447) (originally submitted *in camera* Mar. 24, 2024); Redacted Mot. Dismiss for Vagueness (April 11, 2024) (ECF No. 448) (originally submitted *in camera* Feb. 22, 2024); Redacted Reply Memo. in Support of Mot. (April 11, 2024) (ECF No. 449) (originally submitted *in camera* Mar. 24, 2024); Redacted Suppl. to Reply in Support of Mot. Compel (April 23, 2024) (ECF No. 475); Redacted Mot. Dismiss Selective, Vindictive Prosecution (April 26, 2024) (ECF No. 485); Redacted Reply Memo. in Support of Mot. (April 26, 2024) (ECF No. 487); Redacted Mot. Suppress (May 2, 2024) (ECF No. 516) (originally submitted *in camera* Feb. 22, 2024); Redacted Reply Memo. in Support of Mot. (May 3, 2024) (ECF No. 519); Redacted Reply Memo. in Support of [352] Mot. Dismiss (May 20, 2024) (ECF No. 556) (originally submitted *in camera* Mar. 24, 2024).

Defense counsel's oversight in docketing a redacted copy of docket entry 138 was inadvertent and, again, defense counsel sincerely regrets this error and apologizes to the Court.

[SIGNATURE NEXT PAGE]

¹ Defense counsel is acutely aware that this is the second time the Court has issued an Order directing Mr. Nauta to comply with a prior Order of the Court. *See* Paperless Order (April 28, 2024) (ECF No. 490) (directing compliance with the Court's April 18, 2024, Order (ECF No. 466)). Although Mr. Nauta did not note as much in filing a Notice of Compliance with the Court's Order, *see* Notice (April 29, 2024) (ECF No. 495), Mr. Nuata had already docketed a redacted copy of his grand jury transcript as Exhibit 11 to the public docketing of his Motion to Dismiss for Selective, Vindictive Prosecution (April 26, 2024) (ECF No. 485) (originally submitted *in camera* to the Court Feb. 22, 2024). Nevertheless, this public docketing failed to comply with the Court's requirement that Mr. Nauta, "mak[e] sure to note in the docket text of . . . the filing the corresponding ECF Nos. to which it applies." Mr. Nauta's subsequent notice endeavored to correct that similarly inadvertent oversight. *See* Notice (April 29, 2024) (ECF No. 495).

Date: June 3, 2024

Respectfully submitted,

s/ Stanley E. Woodward, Jr.
Stanley E. Woodward, Jr. (*pro hac vice*)
Brand Woodward Law, LP
400 Fifth Street NW, Suite 350
Washington, D.C. 20010
202.996.7447 (telephone)
202.996.0113 (facsimile)
stanley@brandwoodwardlaw.com

Counsel for Defendant Waltine Nauta

CERTIFICATE OF SERVICE

I hereby certify that on June 3, 2024, I electronically submitted the foregoing via CM/ECF,
to counsel of record.

s/ Sasha Dadan