

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA

v.

DONALD J. TRUMP,

*Defendant.*

Case No. 1:23-cr-00257-TSC

**PRESIDENT TRUMP’S CIPA § 5 NOTICE AND OBJECTION TO  
UNAUTHORIZED DELETIONS OF CLASSIFIED INFORMATION**

On October 26, 2023, President Trump’s counsel provided to the Classified Information Security Officer, for submission to the Court and service on counsel, a notice pursuant to CIPA § 5 and an objection to redactions in certain of the classified discovery produced by the Special Counsel’s Office.

At the beginning of this month, the Special Counsel’s Office argued that “the classified discovery issues” in this case are “limited,” “tangential,” “narrow,” and “incidental” because “the charges . . . do not rely on classified materials.” (Doc. 65 at 1). Through the CIPA § 5 Notice, President Trump demonstrates that “the government appears to have looked with tunnel vision at limited issues it believed were relevant.” *United States v. Sedaghaty*, 728 F.3d 885, 906 (9th Cir. 2013). The Office was wrong.

The Indictment in this case adopts classified assessments by the Intelligence Community and others that minimized, and at times ignored, efforts by foreign actors to influence and interfere with the 2020 election. President Trump will offer classified information at trial relating to foreign influence activities that impacted the 2016 and 2020 elections, as well as efforts by his administration to combat those activities. President Trump will also present classified information relating to the biased and politicized nature of the intelligence assessments that he and others

rejected during the events in question. Collectively, this evidence will undercut central theories of the prosecution and establish that President Trump acted at all times in good faith and on the belief that he was doing what he had been elected to do.

Dated: October 26, 2023

Respectfully submitted,

John F. Lauro, Esq.  
D.C. Bar No. 392830  
jlauro@laurosinger.com  
Gregory M. Singer, Esq. (PHV)  
gsinger@laurosinger.com  
LAURO & SINGER  
400 N. Tampa St., 15th Floor  
Tampa, FL 33602  
(813) 222-8990

/s/ Todd Blanche  
Todd Blanche, Esq. (PHV)  
ToddBlanche@blanchelaw.com  
Emil Bove, Esq. (PHV)  
Emil.Bove@blanchelaw.com  
BLANCHE LAW PLLC  
99 Wall St., Suite 4460  
New York, NY 10005  
(212) 716-1250

*Counsel for President Donald J. Trump*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on October 26, 2023, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF, which in turn serves counsel of record via transmission of Notices of Electronic Filing.

/s/ Todd Blanche  
Todd Blanche