

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

CASE NO. 22-CV-81294-CANNON

DONALD J. TRUMP,

Plaintiff,

v.

UNITED STATES OF AMERICA,

Defendant.

AFFIDAVIT REGARDING DETAILED INVENTORY

I, [REDACTED], hereby declare the following:

1. I am a Supervisory Special Agent with the Federal Bureau of Investigation (“FBI”), United States Department of Justice (“DOJ”), currently assigned to the Counterintelligence Division of the FBI’s Washington Field Office. As a Supervisory Special Agent, I lead a squad of FBI Special Agents, Intelligence Analysts, and other support personnel in conducting counterintelligence and espionage investigations, including investigations concerning the mishandling of classified or national defense information.

2. I make this declaration in response to the Special Master’s Case Management Plan, filed September 22, 2022, which directed a “government official with sufficient knowledge of the matter [to] submit a declaration or affidavit as to whether the Detailed Property Inventory, ECF 39-1, represents the full and accurate extent of the property seized from the premises located at 1100 S. Ocean Boulevard, Palm Beach, Florida 33480 (the

‘Premises’) on August 8, 2022, excluding documents bearing classification markings (the ‘Seized Materials’).” Case Management Plan at 1 ¶ I.¹

3. The squad that I supervise had primary responsibility for the execution of a search warrant at the Premises on August 8, 2022. I was present during the execution of that search warrant, which resulted in the seizure of thirty-three boxes, containers, or other items of evidence, which contained just over one hundred records with classification markings, including records marked TOP SECRET and records marked as containing additional sensitive compartmented information.

4. Since the execution of the search, the Seized Materials have remained in the custody of the FBI and have been maintained pursuant to FBI procedures governing the secure storage of evidence and chain of custody.

5. Following the execution of the search, I and FBI personnel working under my direction began to review the Seized Materials as part of our investigation. Pursuant to the Court’s Preliminary Order, D.E. 29 at 2, Section 3.b.i, I and FBI personnel working under my direction reviewed all of the Seized Materials in order to draft the Detailed Property Inventory, which was filed as D.E. 39-1.

6. In order to ensure that the Detailed Property Inventory was accurate, I and FBI personnel working under my direction conducted an additional review and recount of the Seized Materials in order to make this declaration. That additional review and recount

¹ As the Special Master and the Court are aware, the search warrant executed at the Premises on August 8, 2022, set forth filter procedures concerning potentially privileged material. The materials addressed in this declaration do not include the materials filtered and segregated by the Privilege Review Team that remain in the Privilege Review Team’s possession.

resulted in some minor revisions to the Detailed Property Inventory.² A Revised Detailed Property Inventory is attached hereto.

7. Based on my personal awareness and knowledge of the facts of this matter, as well as my review of FBI records and conversations with those working at my direction in this investigation, the Revised Detailed Property Inventory attached hereto represents the full and accurate extent of the property seized from the Premises on August 8, 2022. I am not aware of any documents or materials seized from the Premises on that date by the FBI that are not reflected in the Revised Detailed Property Inventory, other than materials that the Privilege Review Team has not provided to the Case Team, as described in footnote 1 above.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on September 26th, 2022.



Supervisory Special Agent
Federal Bureau of Investigation

² The Case Management Plan's requirement that I provide this declaration afforded the FBI more time to conduct this additional review and recount than had the Preliminary Order, which required the Detailed Property Inventory to be completed in a single business day.

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**REVISED DETAILED PROPERTY INVENTORY
PURSUANT TO COURT'S PRELIMINARY ORDER**

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| Item #1 – Documents from Office |
| 1 US Government Document with SECRET Classification Markings |
| 2 US Government Documents/Photographs without Classification Markings |

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| Item #2 – Box/Container from Office |
| 99 Magazines/Newspapers/Press Articles and Other Printed Media dated between 01/2017-10/2018 |
| 2 US Government Documents with CONFIDENTIAL Classification Markings |
| 15 US Government Documents with SECRET Classification Markings |
| 7 US Government Documents with TOP SECRET Classification Markings |
| 74 US Government Documents/Photographs without Classification Markings |
| 43 Empty Folders with "CLASSIFIED" Banners |
| 28 Empty Folders Labeled "Return to Staff Secretary/Military Aide" |

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| Item #3 – Documents from Office |
| 2 US Government Documents/Photographs without Classification Markings |

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| Item #4 – Documents from Office |
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| 26 Magazines/Newspapers/Press Articles and Other Printed Media dated between 01/2020-11/2020 |
| 1 US Government Document with CONFIDENTIAL Classification Markings |
| 1 US Government Documents with SECRET Classification Markings |
| 361 US Government Documents/Photographs without Classification Markings |

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| Item #5 – Documents from Office |
| 396 US Government Documents/Photographs without Classification Markings |

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| Item #6 – Documents from Office |
| 671 US Government Documents/Photographs without Classification Markings |

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| Item #7 – Documents from Office |
| 1 US Government Document/Photograph without Classification Markings |

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| Item #8 – Box/Container from Storage Room |
| 68 Magazines/Newspapers/Press Articles and Other Printed Media dated between 10/2015-05/2017 |
| 1 Article of Clothing/Gift Item |
| 1 Book |
| 2 US Government Documents/Photographs without Classification Markings |

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| Item #9 – Box/Container from Storage Room |
| 91 Magazines/Newspapers/Press Articles and Other Printed Media dated between 01/2019-09/2020 |
| 1 Article of Clothing/Gift Item |
| 65 US Government Documents/Photographs without Classification Markings |

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| Item #10 – Box/Container from Storage Room |
| 30 Magazines/Newspapers/Press Articles and Other Printed Media dated between 10/2008-12/2019 |
| 11 US Government Documents with CONFIDENTIAL Classification Markings |
| 21 US Government Documents with SECRET Classification Markings |

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| 3 Articles of Clothing/Gift Items |
| 1 Book |
| 257 US Government Documents/Photographs without Classification Markings |

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| Item #11 – Box/Container from Storage Room |
| 116 Magazines/Newspapers/Press Articles and Other Printed Media dated between 06/2019-08/2020 |
| 8 US Government Documents with CONFIDENTIAL Classification Markings |
| 1 US Government Document with SECRET Classification Markings |
| 2 US Government Document with TOP SECRET Classification Markings |
| 110 US Government Documents/Photographs without Classification Markings |

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| Item #12 – Box/Container from Storage Room |
| 39 Magazines/Newspapers/Press Articles and Other Printed Media dated between 01/2017-03/2020 |
| 71 US Government Documents/Photographs without Classification Markings |

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| Item #13 – Box/Container from Storage Room |
| 52 Magazines/Newspapers/Press Articles and Other Printed Media dated between 09/2018 -08/2019 |
| 2 US Government Documents with CONFIDENTIAL Classification Markings |
| 1 US Government Document with TOP SECRET Classification Markings |
| 1 Article of Clothing/Gift Items |
| 710 US Government Documents/Photographs without Classification Markings |

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| Item #14 – Box/Container from Storage Room |
| 87 Magazines/Newspapers/Press Articles and Other Printed Media dated between 01/2018-11/2019 |
| 2 US Government Documents with CONFIDENTIAL Classification Markings |
| 438 US Government Documents/Photographs without Classification Markings |

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| Item #15 – Box/Container from Storage Room |
| 65 Magazines/Newspapers/Press Articles and Other Printed Media dated between 10/2016-11/2018 |

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| 1 US Government Documents with CONFIDENTIAL Classification Markings |
| 4 US Government Document with SECRET Classification Markings |
| 2 Books |
| 78 US Government Documents/Photographs without Classification Markings |
| 2 Empty Folders with "CLASSIFIED" Banners |
| 2 Empty Folders Labeled "Return to Staff Secretary/Military Aide" |

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| Item #16 – Box/Container from Storage Room |
| 76 Magazines/Newspapers/Press Articles and Other Printed Media dated between 11/2017-12/2017 |
| 60 US Government Documents/Photographs without Classification Markings |

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| Item #17 – Box/Container from Storage Room |
| 67 Magazines/Newspapers/Press Articles and Other Printed Media dated between 7/2016 – 3/2017 |
| 5 Articles of Clothing/Gift Items |
| 2 US Government Documents/Photographs without Classification Markings |

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| Item #18 – Box/Container from Storage Room |
| 4 Magazines/Newspapers/Press Articles and Other Printed Media dated between 01/2018 – 12/2019 |
| 1 US Government Document with SECRET Classification Markings |
| 1 Book |
| 1578 US Government Documents/Photographs without Classification Markings |
| 2 Empty Folders Labeled "Return to Staff Secretary/Military Aide" |

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| Item #19 – Box/Container from Storage Room |
| 53 Magazines/Newspapers/Press Articles and Other Printed Media dated between 05/2016 – 01/2020 |
| 1 US Government Documents with CONFIDENTIAL Classification Markings |
| 5 Articles of Clothing/Gift Items |
| 236 US Government Documents/Photographs without Classification Markings |

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| Item #20 – Box/Container from Storage Room |
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| 121 Magazines/Newspapers/Press Articles and Other Printed Media dated between 08/2017-12/2017 |
| 16 US Government Documents/Photographs without Classification Markings |

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| Item #21 – Box/Container from Storage Room |
| 2 Magazines/Newspapers/Press Articles and Other Printed Media dated 11/2020 |
| 1413 US Government Documents/Photographs without Classification Markings |

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| Item #22 – Box/Container from Storage Room |
| 114 Magazines/Newspapers/Press Articles and Other Printed Media dated between 06/2020 – 10/2020 |
| 25 US Government Documents/Photographs without Classification Markings |

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| Item #23 – Box/Container from Storage Room |
| 68 Magazines/Newspapers/Press Articles and Other Printed Media dated between 11/2016 – 06/2018 |
| 1 US Government Document with SECRET Classification Markings |
| 1 Book |
| 69 US Government Documents/Photographs without Classification Markings |
| 8 Empty Folders Labeled “Return to Staff Secretary/Military Aide” |

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| Item #24 – Box/Container from Storage Room |
| 1 Magazines/Newspapers/Press Articles and Other Printed Media dated circa 2018 |
| 1599 US Government Documents/Photographs without Classification Markings |

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| Item #25 – Box/Container from Storage Room |
| 76 Magazines/Newspapers/Press Articles and Other Printed Media dated between 10/2016 – 11/2017 |
| 1 US Government Documents with CONFIDENTIAL Classification Markings |
| 1 US Government Document with SECRET Classification Markings |
| 20 US Government Documents/Photographs without Classification Markings |
| 1 Empty Folder with “CLASSIFIED” Banner |

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| Item #26 – Box/Container from Storage Room |
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| 8 Magazines/Newspapers/Press Articles and Other Printed Media dated between 12/2017 – 3/2020 |
| 3 US Government Document with TOP SECRET Classification Markings |
| 1 Article of Clothing/Gift Items |
| 1 Book |
| 1844 US Government Documents/Photographs without Classification Markings |

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| Item #27– Box/Container from Storage Room |
| 1 Magazines/Newspapers/Press Articles and Other Printed Media dated between 07/2016 – 9/2020 |
| 1 Article of Clothing/Gift Items |
| 23 Books |
| 52 US Government Documents/Photographs without Classification Markings |

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| Item #28 – Box/Container from Storage Room |
| 2 Magazines/Newspapers/Press Articles and Other Printed Media dated between 2/2017 – 3/2017 |
| 2 US Government Documents with CONFIDENTIAL Classification Markings |
| 8 US Government Document with SECRET Classification Markings |
| 4 US Government Document with TOP SECRET Classification Markings |
| 1 Article of Clothing/Gift Items |
| 1 Book |
| 793 US Government Documents/Photographs without Classification Markings |

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| Item #29 – Box/Container from Storage Room |
| 84 Magazines/Newspapers/Press Articles and Other Printed Media dated between 10/1995 – 05/2019 |
| 1 US Government Document with TOP SECRET Classification Markings |
| 35 US Government Documents/Photographs without Classification Markings |

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| Item #30 – Box/Container from Storage Room |
| 29 Magazines/Newspapers/Press Articles and Other Printed Media dated between 05/2020 – 09/2020 |
| 82 US Government Documents/Photographs without Classification Markings |

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| Item # 31– Box/Container from Storage Room |
| 111 Magazines/Newspapers/Press Articles and Other Printed Media dated between 06/2015 – 04/2019 |
| 41 US Government Documents/Photographs without Classification Markings |

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| Item #32 – Box/Container from Storage Room |
| 98 Magazines/Newspapers/Press Articles and Other Printed Media dated between 02/2008 – 04/2020 |
| 1 Book |
| 87 US Government Documents/Photographs without Classification Markings |

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| Item #33 – Box/Container from Storage Room |
| 83 Magazines/Newspapers/Press Articles and Other Printed Media dated between 02/2017 – 02/2018 |
| 1 Book |
| 44 US Government Documents/Photographs without Classification Markings |
| 2 Empty Folders Labeled “Return to Staff Secretary/Military Aide” |