Dear Mr. Warrington:

We are in receipt of your letter of November 2, 2022, on behalf of your client, former President Trump, and the letter from Mr. Trump dated October 13, 2022. Given the timing and nature of your letter—without any acknowledgement that Mr. Trump will ultimately comply with the subpoena—your approach on his behalf appears to be a delay tactic. Moreover, we do not see any basis in the letter for Mr. Trump to withhold the beginning of his production.

We are willing to extend the deadline to produce documents to Wednesday, November 9, 2022, on which date we expect an initial production of documents. We request that your client produce the following documents—to the extent they are in his possession—by Wednesday, November 9 (the paragraph numbers are from the subpoena schedule):

1. All records of any telephone calls, text messages, or communications sent through Signal or any other means, placed or received by [Mr. Trump] or at [Mr. Trump’s] direction on January 6, 2021, including records of any calls [Mr. Trump] joined as an active or passive participant.

19. Information sufficient to identify every telephone or other communications device [Mr. Trump] used between November 3, 2020, and January 20, 2021.

For purposes of paragraphs 1 and 19, Mr. Trump need not include any information about government-owned devices in this initial production. Despite its exhaustive investigation, the Select Committee has not been able to obtain a full and complete set of this material from other sources. To the extent this information remains under your custody or control but not in your personal possession, it should require no more than a limited search by agents or former agents with access to such information. There is no basis to further limit these requests, which are central to the Select Committee’s investigation and narrowly tailored to the Select Committee’s investigative needs.

We are willing to work with you and to discuss the issues in your letter, but first Mr. Trump must begin to produce documents on November 9, 2022. After that has occurred, we will continue
to work with Mr. Trump in a spirit of mutual accommodation, but we expect that the core of the documents called for by the subpoena can be quickly collected and produced.

Sincerely,

[Signature]

Bennie G. Thompson
Chairman