

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

CASE NO. 23-80101(s)-CR-CANNON

UNITED STATES OF AMERICA,

Plaintiff,

v.

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

Defendants.

GOVERNMENT'S FOURTH MOTION FOR CERTAIN REDACTIONS

In accordance with the Court's paperless Orders at ECF Nos. 320 and 365, the Government files this motion to respectfully request certain redactions in its sur-reply in opposition to defendant Nauta's motion to dismiss for selective and vindictive prosecution, and associated exhibits.¹ The Government is filing this motion publicly, but is emailing to chambers and defense counsel "red box" versions of the sur-reply and exhibits. Set forth below are the Government's justifications in support of those redactions.

The lone requested redaction in the sur-reply itself appears on page 6, which references and quotes a filing (ECF No. 115) that this Court has ordered sealed. As noted in ECF No. 423, the Government does not object to the Court's unsealing ECF Nos. 101, 115, 116, and 118, but until it does so, this passage must be redacted.

¹ Government counsel has conferred with counsel for defendant Nauta, who requested an opportunity to respond to this motion and indicated he would do so tomorrow, April 19, 2024.

The redactions to Exhibits 2 and 3 to the sur-reply consist of PII and the name of the person referred to in the sur-reply as Woodward Client 1, whose identity in connection with the grand jury matter is subject to Rule 6(e). As to the latter, the Government requests that the name remain redacted unless and until that person appears as a witness at trial. The PII should remain redacted.

For the foregoing reasons, the Court should grant the Government's Motion.

Respectfully submitted,

JACK SMITH
Special Counsel

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CERTIFICATE OF SERVICE

I hereby certify that on April 18, 2024, 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/ David V. Harbach, II
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