

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

UNDER SEAL

**PRESIDENT DONALD J. TRUMP’S SUBMISSION REGARDING REDACTIONS TO
THE SPECIAL COUNSEL’S PRESIDENTIAL IMMUNITY “APPENDIX”**

President Donald J. Trump respectfully submits this response to the Court’s September 27, 2024 Minute Order regarding the redactions proposed by the Special Counsel’s Office to the “Appendix” to the Office’s “Motion for Immunity Determinations.”¹

There should be no further disclosures at this time of the so-called “evidence” that the Special Counsel’s Office has unlawfully cherry-picked and mischaracterized—during early voting in the 2024 Presidential election—in connection with an improper Presidential immunity filing that has no basis in criminal procedure or judicial precedent. President Trump maintains his objections, *see* ECF No. 248, based on overt and inappropriate election interference, violations of longstanding DOJ policy, the Office’s previous safety-related representations in this District and the Southern District of Florida, grand jury secrecy, and the influence on potential witnesses and jurors of prejudicial pretrial publicity—which predictably followed from the filing of the redacted “Motion for Immunity Determinations.”² If the Court decides to release additional information

¹ Pursuant to the Court’s September 27, 2024 Minute Order, President Trump has submitted this filing to the Special Counsel’s Office and the Court for temporary sealing. President Trump does not believe continued sealing of today’s submission is necessary.

² *See, e.g.,* Ellie Honig, *Jack Smith’s October Cheap Shot*, N.Y. Magazine (Oct. 3, 2024), <https://nymag.com/intelligencer/article/jack-smith-october-surprise-donald-trump.html>; *see also*

relating to the Office's filing, in the Appendix or otherwise, President Trump respectfully requests that the Court stay that determination for a reasonable period of time so that President Trump can evaluate litigation options relating to the decision.

Dated: October 10, 2024

Respectfully submitted,

/s/ John F. Lauro / Gregory Singer

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Jack Goldsmith, *Jack Smith Owes Us an Explanation*, N.Y. Times (Oct. 9, 2024), <https://www.nytimes.com/2024/10/09/opinion/jack-smith-trump-biden.html>.