

**The Attempt to Delete Security Camera Footage**

74. On June 3, 2022, when FBI agents were at The Mar-a-Lago Club to collect the documents with classification markings from Trump Attorney 1 and Trump Attorney 3, the agents observed that there were surveillance cameras located near the Storage Room.

75. On June 22, 2022, the Department of Justice emailed an attorney for **TRUMP**'s business organization a draft grand jury subpoena requiring the production of certain security camera footage from The Mar-a-Lago Club, including footage from cameras "on ground floor (basement)," where the Storage Room was located.

76. On June 23, 2022, at 8:46 p.m., **TRUMP** called **DE OLIVEIRA** and they spoke for approximately 24 minutes.

77. On Friday, June 24, 2022, the Department of Justice emailed the attorney for **TRUMP**'s business organization the final grand jury subpoena, which required the production of "[a]ny and all surveillance records, videos, images, photographs and/or CCTV from internal cameras" at certain locations at The Mar-a-Lago Club, including "on ground floor (basement)," from January 10, 2022, to June 24, 2022.

78. That same day, June 24, 2022, at 1:25 p.m., Trump Attorney 1 spoke with **TRUMP** by phone regarding the subpoena for security camera footage. At 3:44 p.m., **NAUTA** received a text message from a co-worker, Trump Employee 3, indicating that **TRUMP** wanted to see **NAUTA**. Less than two hours later, **NAUTA**—who was scheduled to travel with **TRUMP** to Illinois the next day—changed his travel schedule and began to make arrangements to go to Palm Beach, Florida, instead.

79. **NAUTA** provided inconsistent explanations to colleagues for his sudden travel to Florida. At 7:14 p.m. on June 24, he texted one person that he would not be traveling with **TRUMP**

the next day because he had a family emergency and used “shushing” emojis; at 9:48 p.m. that night, he texted a Secret Service agent that he had to check on a family member in Florida; and after he arrived in Florida on June 25, he texted the same Secret Service agent that he was in Florida working.

80. Around the same time on June 24 that **NAUTA** was making his travel plans to go to Florida, **NAUTA** and **DE OLIVEIRA** contacted Trump Employee 4, who was the Director of Information Technology (“IT”) at The Mar-a-Lago Club, as follows:

- a. At 5:02 p.m., **NAUTA** sent text messages to Trump Employee 4 asking, “Hey bro You around this weekend.”
- b. At 5:05 p.m., **NAUTA** texted **DE OLIVEIRA**, asking, “Hey brother You working today?” **DE OLIVEIRA** responded, “Yes I just left.” **NAUTA** then called **DE OLIVEIRA** and they spoke for approximately two minutes.
- c. At 5:09 p.m., Trump Employee 4 texted a response to **NAUTA**, “I am local. Entertaining some family that came to visit. What’s up?” **NAUTA** responded to Trump Employee 4, “Ok, cool. No biggie just wanted to see if you where around. Enjoy bro!”
- d. At 6:56 p.m., **DE OLIVEIRA** texted Trump Employee 4, “Hey buddy how are you ... Walter call me early said it was trying to get in touch with you I guess he’s coming down tomorrow I guess needs you for something.” Trump Employee 4 responded, “He reached out but he didn’t say what he wanted. I told him I was local but entertaining some family that came from NYC this weekend. He told me to no worries.”
- e. At 6:58 p.m., Trump Employee 4 texted **NAUTA**, “Bro, if you need me I can get away for a few. Just let me know.” **NAUTA** responded, “Sounds good!! Thank you.”

81. On Saturday, June 25, 2022, **NAUTA** traveled from Bedminster, New Jersey, to Palm Beach, Florida. Prior to **NAUTA**’s trip, **DE OLIVEIRA** told a valet at The Mar-a-Lago Club (“Trump Employee 5”) that **NAUTA** was coming down. **DE OLIVEIRA** asked Trump Employee 5 not to tell anyone that **NAUTA** was coming down because **NAUTA** wanted the trip

to remain secret. **DE OLIVEIRA** also told Trump Employee 5 that **NAUTA** wanted **DE OLIVEIRA** to talk to Trump Employee 4 to see how long camera footage was stored.

82. Shortly after arriving in Palm Beach on the evening of June 25, **NAUTA** went to The Mar-a-Lago Club and met with **DE OLIVEIRA** at 5:46 p.m. At The Mar-a-Lago Club, **NAUTA** and **DE OLIVEIRA** went to the security guard booth where surveillance video is displayed on monitors, walked with a flashlight through the tunnel where the Storage Room was located, and observed and pointed out surveillance cameras.

83. On Monday, June 27, 2022, at 9:48 a.m., **DE OLIVEIRA** walked to the IT office where Trump Employee 4 was working with another employee in the IT department. **DE OLIVEIRA** requested that Trump Employee 4 step away from the office so that **DE OLIVEIRA** and Trump Employee 4 could talk.

84. At 9:49 a.m., Trump Employee 4 and **DE OLIVEIRA** left the area of the IT office together and walked through a basement tunnel. **DE OLIVEIRA** took Trump Employee 4 to a small room known as an “audio closet” near the White and Gold Ballroom. Once inside the audio closet, **DE OLIVEIRA** and Trump Employee 4 had the following exchange:

- a. **DE OLIVEIRA** told Trump Employee 4 that their conversation should remain between the two of them.
- b. **DE OLIVEIRA** asked Trump Employee 4 how many days the server retained footage. Trump Employee 4 responded that he believed it was approximately 45 days.
- c. **DE OLIVEIRA** told Trump Employee 4 that “the boss” wanted the server deleted. Trump Employee 4 responded that he would not know how to do that, and that he did not believe that he would have the rights to do that. Trump Employee 4 told **DE OLIVEIRA** that **DE OLIVEIRA** would have to reach out to another employee who was a supervisor of security for **TRUMP**’s business organization. **DE OLIVEIRA** then insisted to **TRUMP** Employee 4 that “the boss” wanted the server deleted and asked, “what are we going to do?”

85. At 10:14 a.m., **DE OLIVEIRA** texted **NAUTA**, who was still in Florida, “Hey buddy are you working today?” **DE OLIVEIRA** then called **NAUTA** at 10:15 a.m., and they spoke for approximately one minute.

86. Later that day, at 1:06 p.m., **NAUTA** texted **DE OLIVEIRA**, who was at The Mar-a-Lago Club, “On my way to you.” Between 1:31 p.m. and 1:50 p.m., **DE OLIVEIRA** walked through the bushes on the northern edge of The Mar-a-Lago Club property to meet with **NAUTA** on the adjacent property; then walked back to the IT office that he had visited that morning; and then walked again through the bushes on the northern edge of The Mar-a-Lago Club property to meet with **NAUTA** on the adjacent property.

87. At 3:55 p.m., **TRUMP** called **DE OLIVEIRA** and they spoke for approximately three and a half minutes.

**The Court-Authorized Search of The Mar-a-Lago Club**

88. In July 2022, the FBI and grand jury obtained and reviewed surveillance video from The Mar-a-Lago Club showing the movement of boxes set forth above.

89. August 8, 2022, the FBI executed a court-authorized search warrant at The Mar-a-Lago Club. The search warrant authorized the FBI to search for and seize, among other things, all documents with classification markings.

90. During the execution of the warrant at The Mar-a-Lago Club, the FBI seized 102 documents with classification markings in **TRUMP**’s office and the Storage Room, as follows:

<b>Location</b>	<b>Number of Documents</b>	<b>Classification Markings</b>
<b>TRUMP</b> ’s Office	27	Top Secret (6) Secret (18) Confidential (3)
Storage Room	75	Top Secret (11) Secret (36) Confidential (28)