



**CONFIDENTIAL**

**BAD MAIL**

OSINT Days  
by IL ISP-STIC [REDACTED] on 11/9/2016 2:54:59 PM

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-FACEBOOK EVENT: Emergency Protest // Chicago

\* Source: <https://www.facebook.com/events/1594018767573259/>

\* Source: <https://www.facebook.com/ANSWERChicago/>

Hosted by: Answer (Act Now to Stop War and End Racism) Chicago

About: [http://www.answercoalition.org/who\\_we\\_are](http://www.answercoalition.org/who_we_are)

Time: Today at 5 PM - 9 PM

Location: PTrump International Hotel & Tower Chicago  
401 N Wabash Avenue, Chicago, Illinois 60611

Details:

**EMERGENCY PROTEST!**

Donald Trump, a vile racist and sexist, has been declared the winner of the U.S. presidential election. We must resist this outcome! In fact, we cannot be idle. We must get into the streets immediately. We must unite and stand with immigrants, Muslims, women, LGBTQ people, poor and working people and Black Lives Matter. Only the people can defeat racism, bigotry and hate! All Out! Come together and descend on the Trump hotel! Bring your signs, banners and voices of protest. Spread the word. Let's make the emergency protest as big as possible!

Call 773-885-3991 for more information.

Guests:

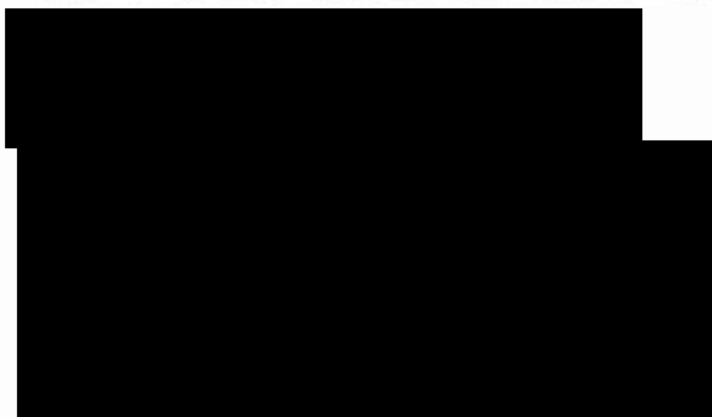
Interested: 13K

Going: 7.8K

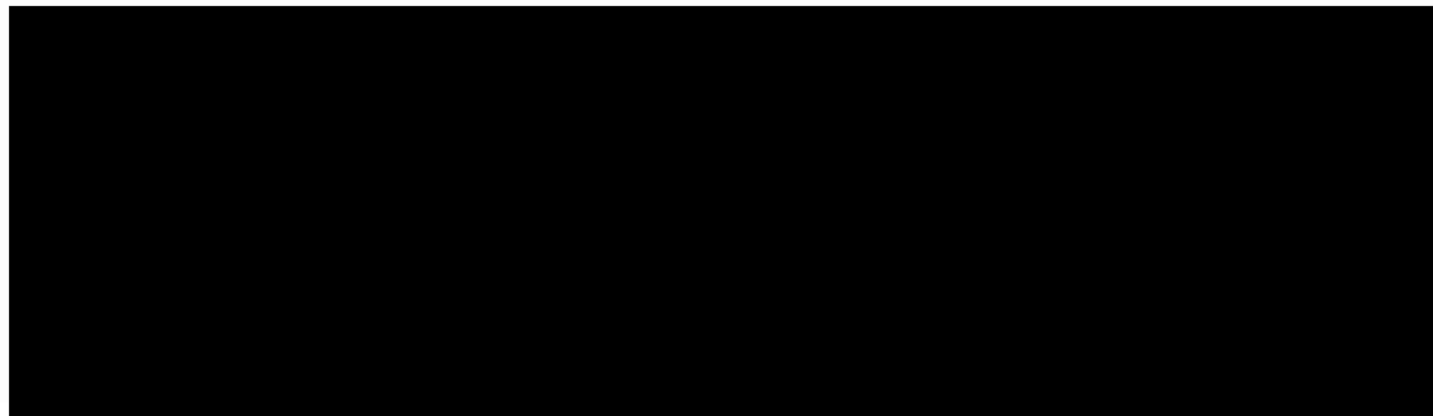
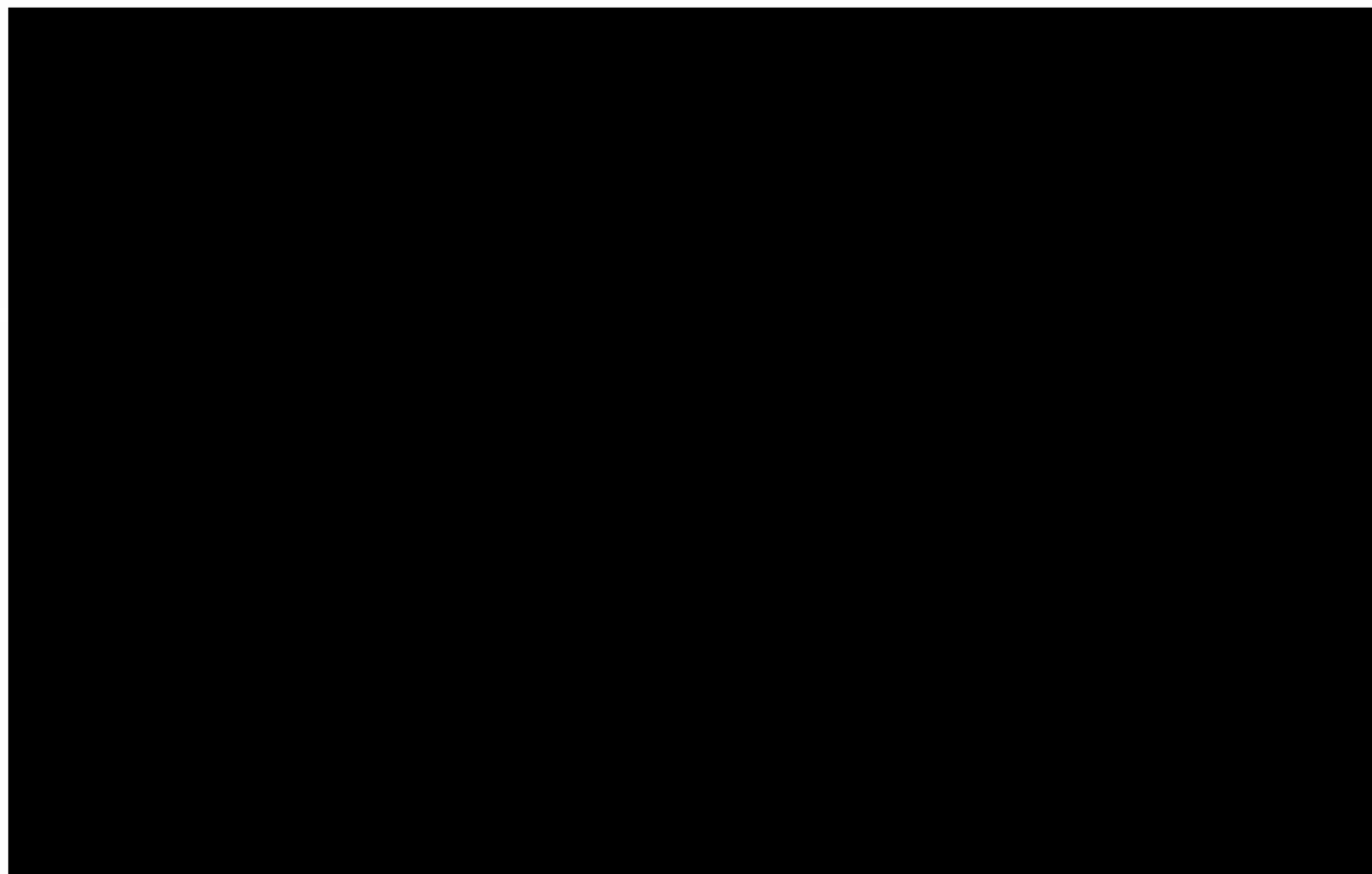
Shared with: 49K

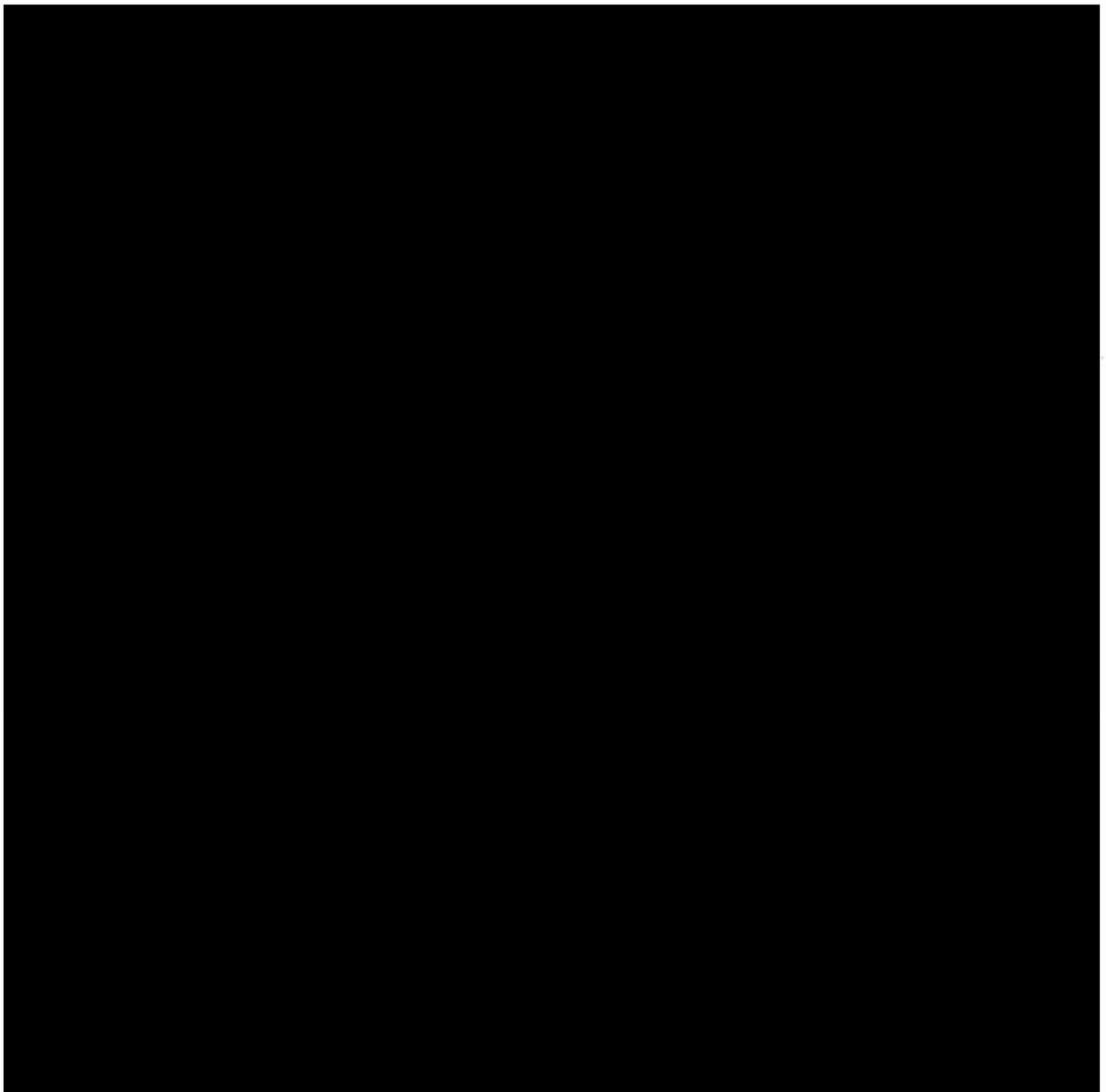
Midnight Shift OSINT  
by IL STIC [REDACTED] on 11/25/2016 6:41:59 AM

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ILLINOIS OSINT









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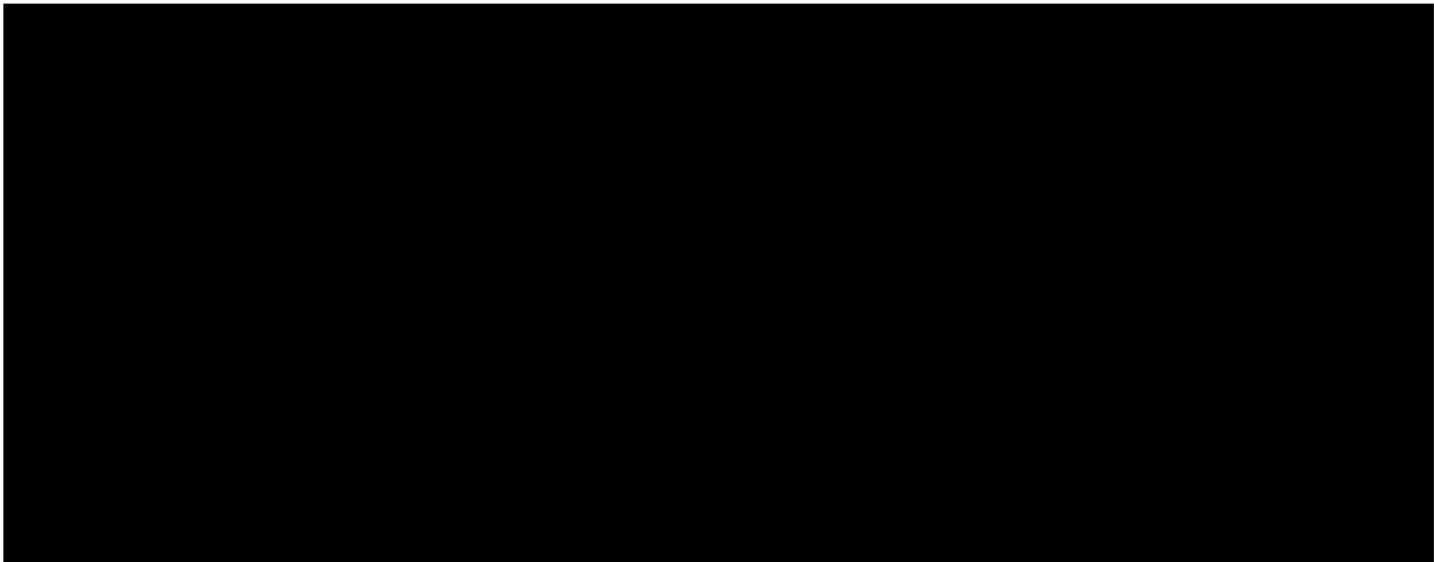


INAUGURATION DAY PROTESTS ILLINOIS: Searches for threats or public safety issues were negative.

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Evening Shift - OSINT  
by IL ISP - STIC [REDACTED] on 1/28/2017 10:36:00 PM

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#### Trump protesters shut down traffic to O'Hare Terminal 5

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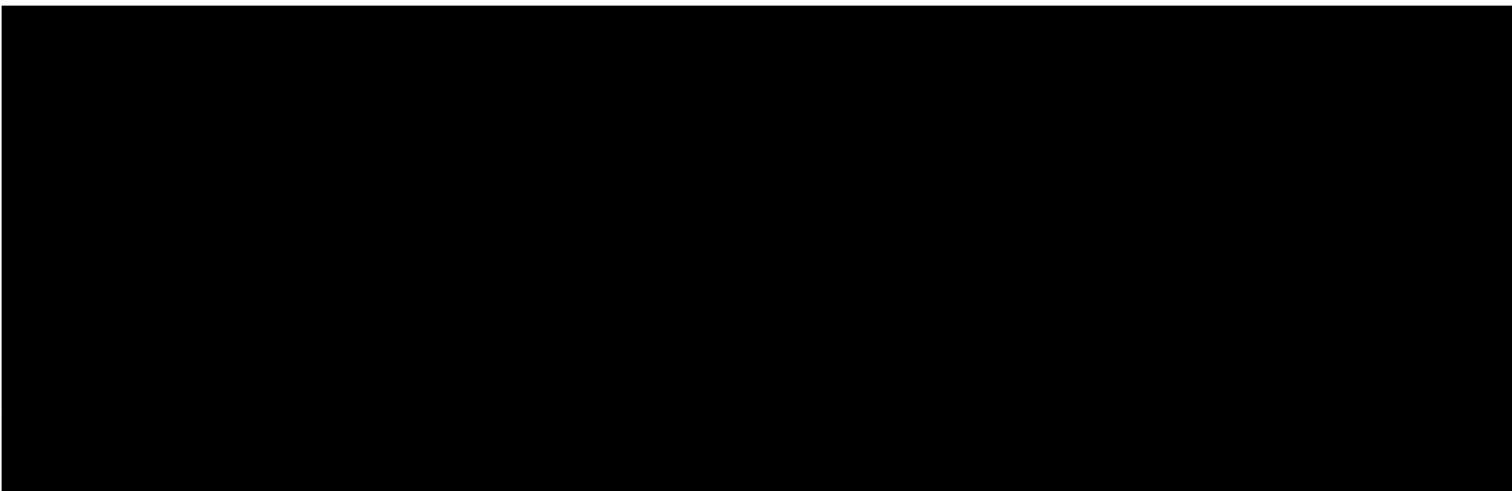
Despite the traffic shutdown, the terminal remained open for business.

A crowd of thousands gathered outside the terminal Saturday night to block arriving traffic to the airport. Chicago aviation police said drivers were driving the wrong way down the street to get out, and they blocked anyone from entering.

Some travelers joined the protest, while others were angry.

"The city of Chicago and than Emanuel should be ashamed," said Patrice Hollander of Barrington, who arrived at O'Hare Saturday. "This is insanity at the highest level. They can't control the streets and apparently they can't control the airport either."

<http://chicago.suntimes.com/politics/trump-protesters-shut-down-ohare-international-terminal/>

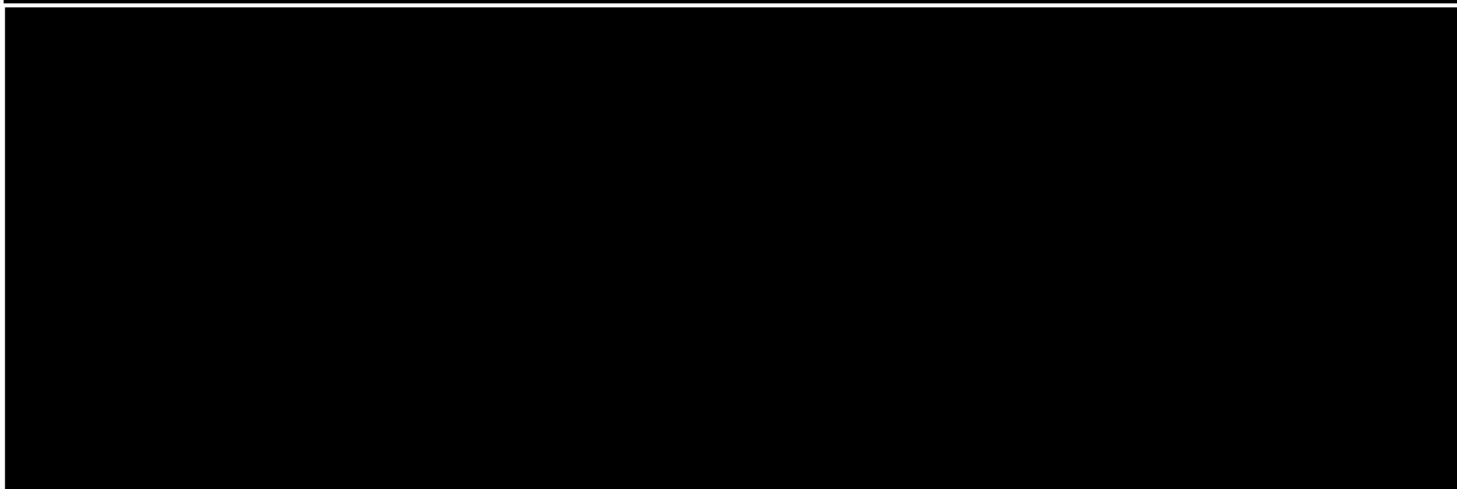
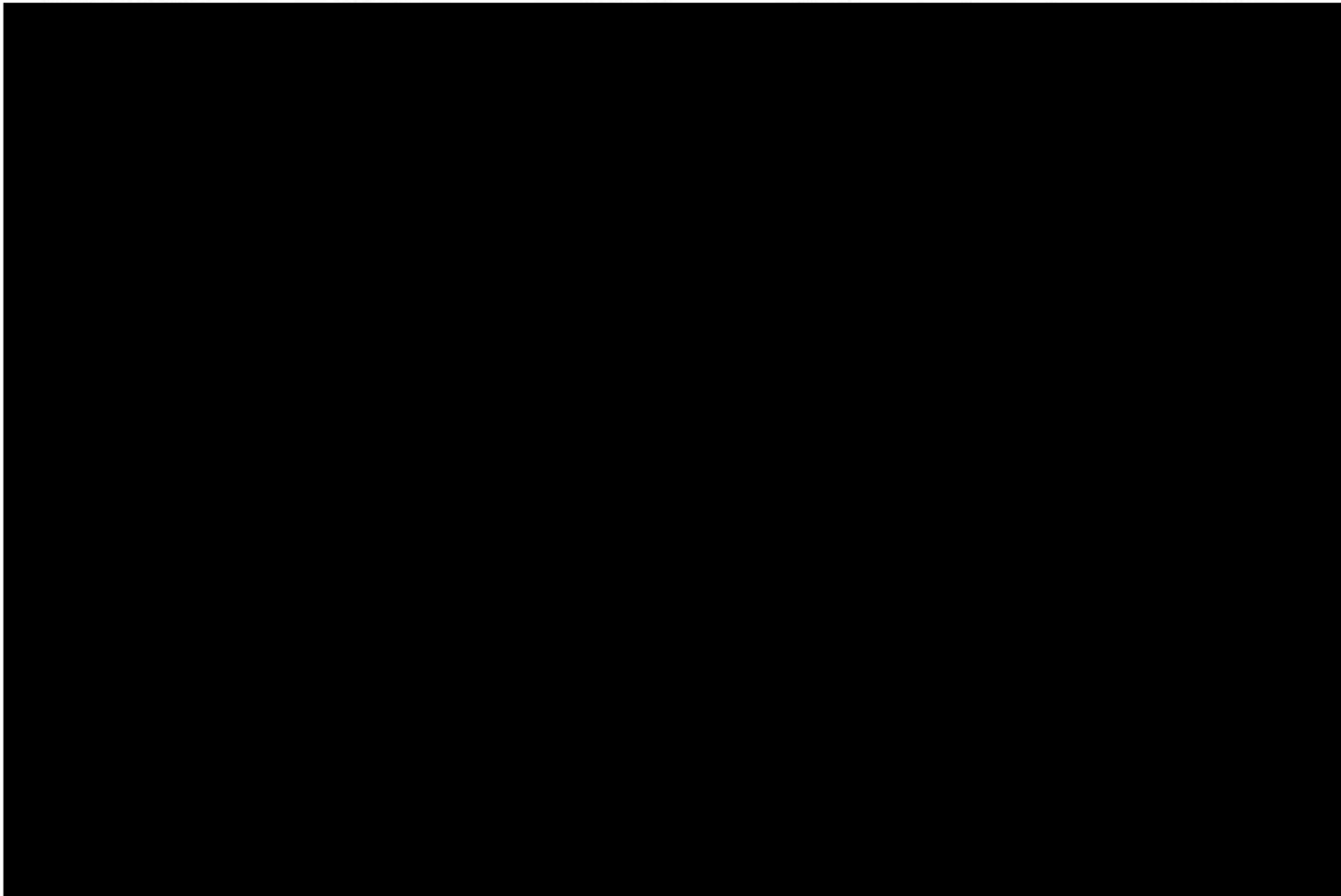






Midnight Shift - OSINT  
by IL STIC [REDACTED] on 1/29/2017 7:00:02 AM

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OSINT Days  
by IL ISP-STIC [REDACTED] on 1/29/2017 3:08:21 PM

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1.  
Chicago O'Hare Airport Protest Event:

Meeting at 6:00 p.m. Terminal 5.

[https://www.facebook.com/events/1300438373353765/?active\\_tab=about](https://www.facebook.com/events/1300438373353765/?active_tab=about)

Twitter-  
Chicago Ohare  
muslim ban protest chicago

2.  
Morton Grove Event

\*\*\*\*UPDATE AT 2:51 PM\*\*\* Rally size estimated at 1,000 and no issues to report so far.

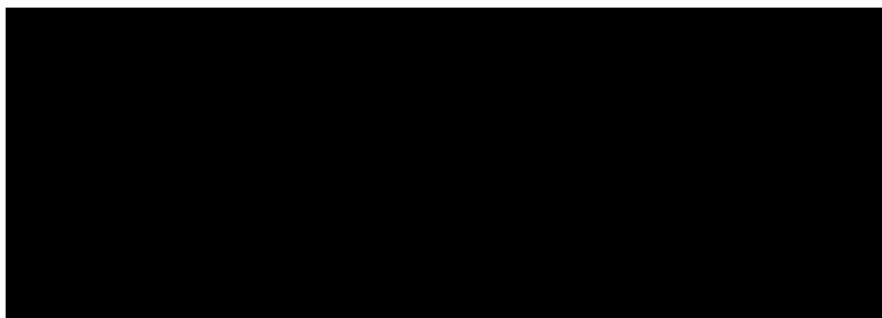
Empowering the Diverse Community-Walk/Rally with Diverse Organizations: A post inauguration walk and rally showing that nothing will stop us....not weather, politics, physical limitations, or slanders to our faith. We will work together and have our voices heard , Jan. 29-1:45PM to 4PM-MEC-Morton Grove-email: MCCInterfaithTeam@gmail.com (Flyer attached)

Meeting location is at MEC (Muslim Education Center)  
Address: 8601 N. Menard Ave., Morton Grove, IL

Twitter-  
MEC Morton Grove

500 plus currently there and more are expected

Contact for any observed threats to public safety or property:



3.  
Willard Airport Event - This event should be winding down.

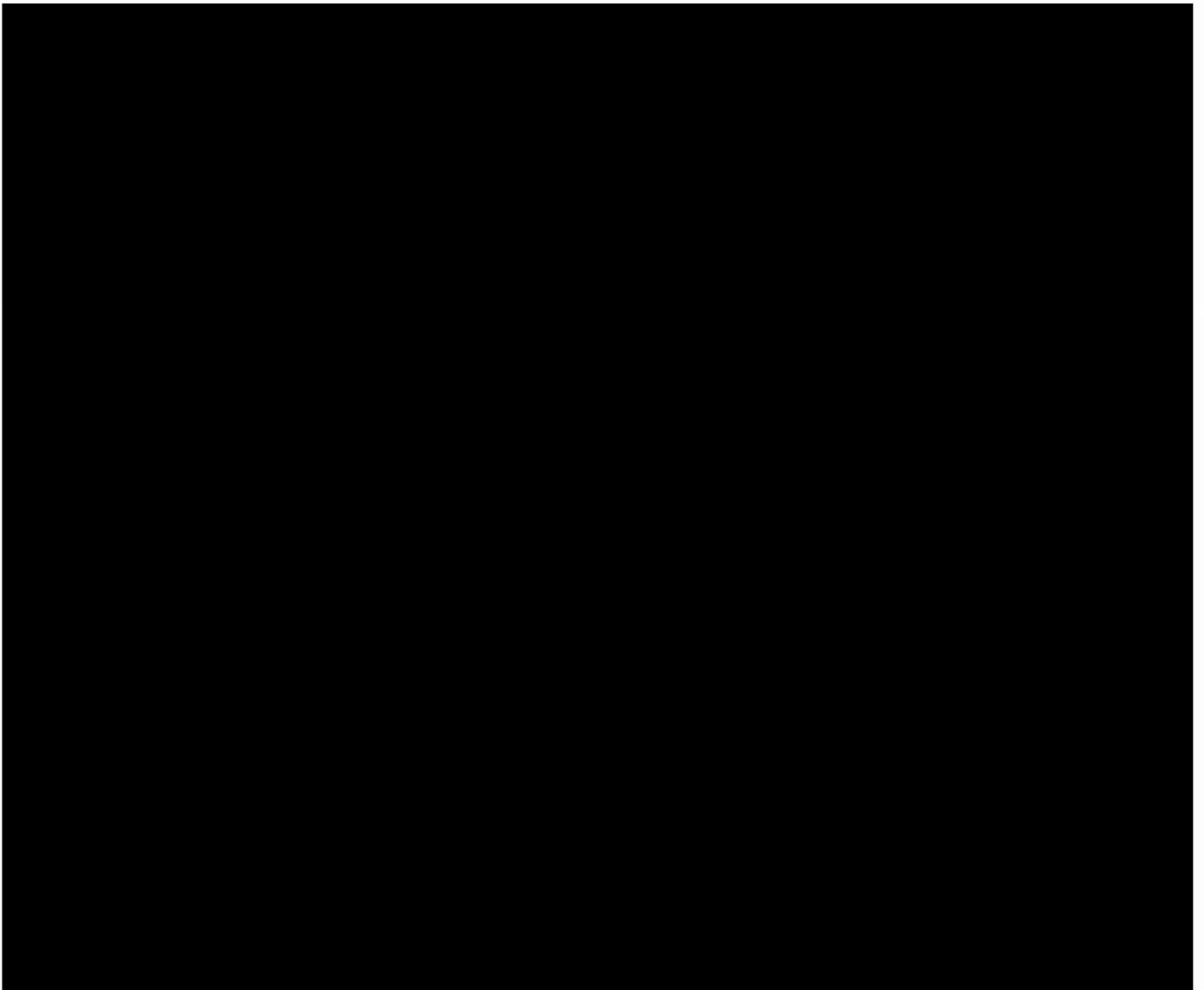


Location: 11 Airport Rd, champaign, IL

Time: 2:00 - 3:00 pm







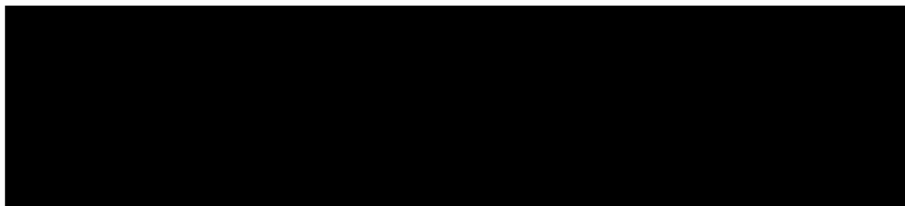


OSINT - Evening Shift

by IL ISP-STIC [REDACTED] RIES-CT on 2/16/2017 10:25:14 PM

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OSINT - Evening Shift 02/16/17



2)  
Strike 4 Democracy - Feb 17

No threats of violence

Hundreds of Events Planned Nationwide for Friday's 'General Strike'

Tens of thousands of people across the United States are expected to skip work and attend rallies and marches Friday as part of a "general strike" to "get our democracy back (since Trump was elected)." Dozens of organizers are working independently to stage events. Rallies and marches are scheduled in more than 30 states. \*\*Chicago, IL is listed on the "Events Page" as is Rockford (Joe Marino Park)

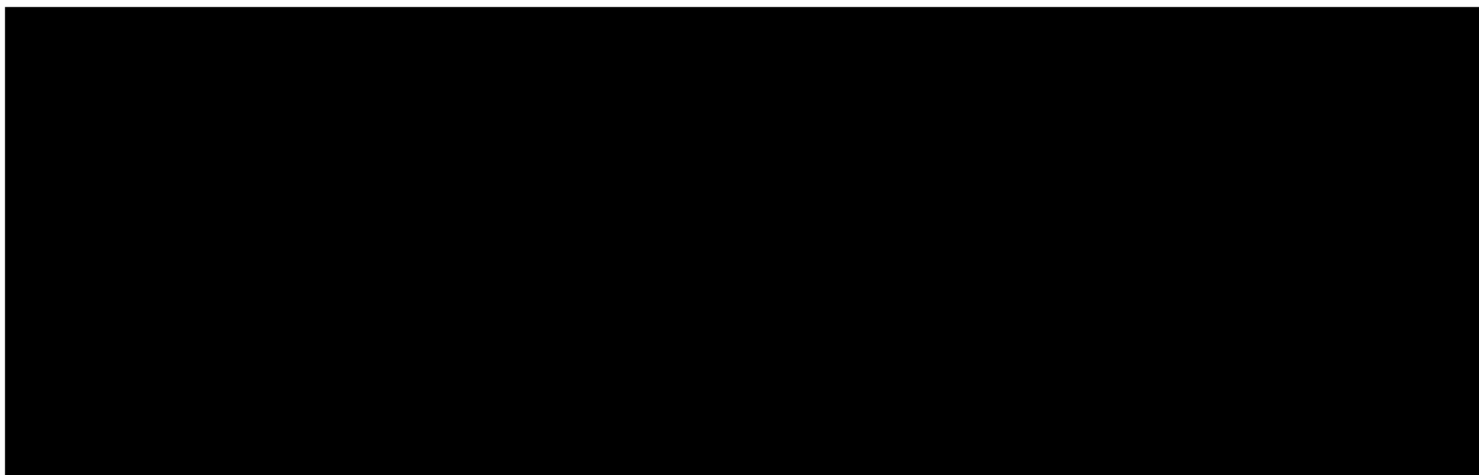
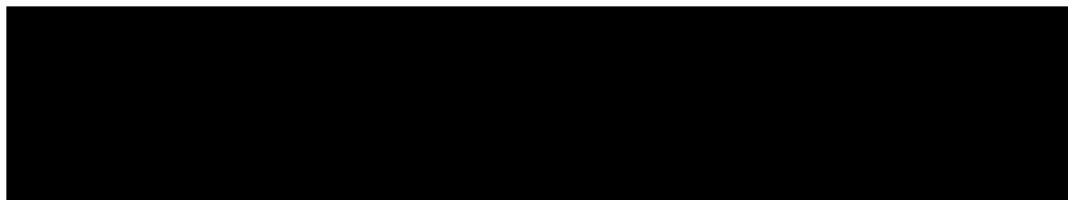
Chicago Daley Plaza - <https://www.facebook.com/events/249413662168043/>

Chicago Trump Tower - <https://www.facebook.com/events/1313906591965438/>

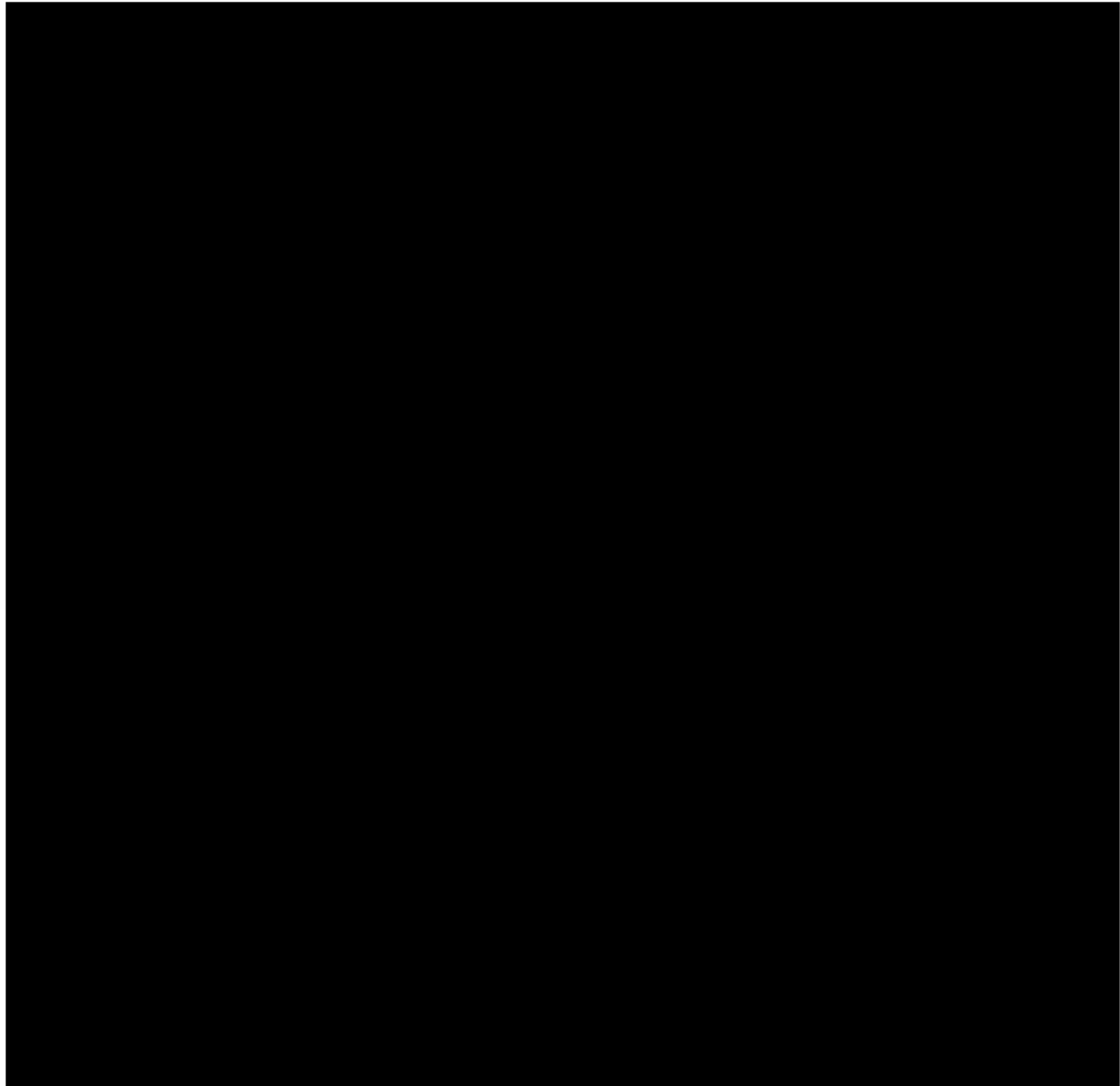
Chicago Trump Tower - <https://www.meetup.com/Indivisible-Chicago/events/237438361/>

Elgin (Grove/Kimball) - <https://www.facebook.com/events/607993969400220/>

NW IL - [https://www.facebook.com/groups/1808454932738390/?hc\\_location=ufi](https://www.facebook.com/groups/1808454932738390/?hc_location=ufi)







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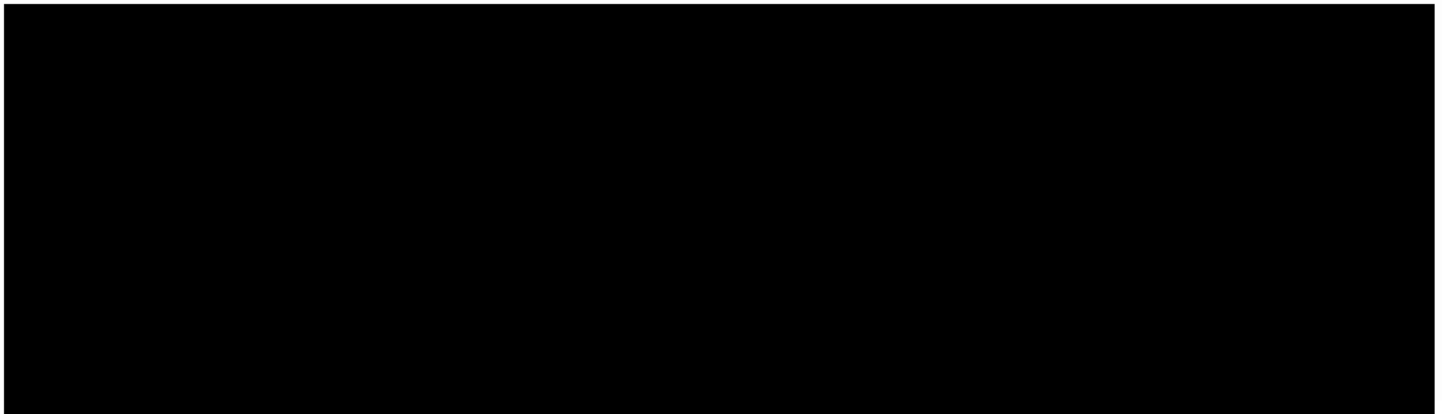
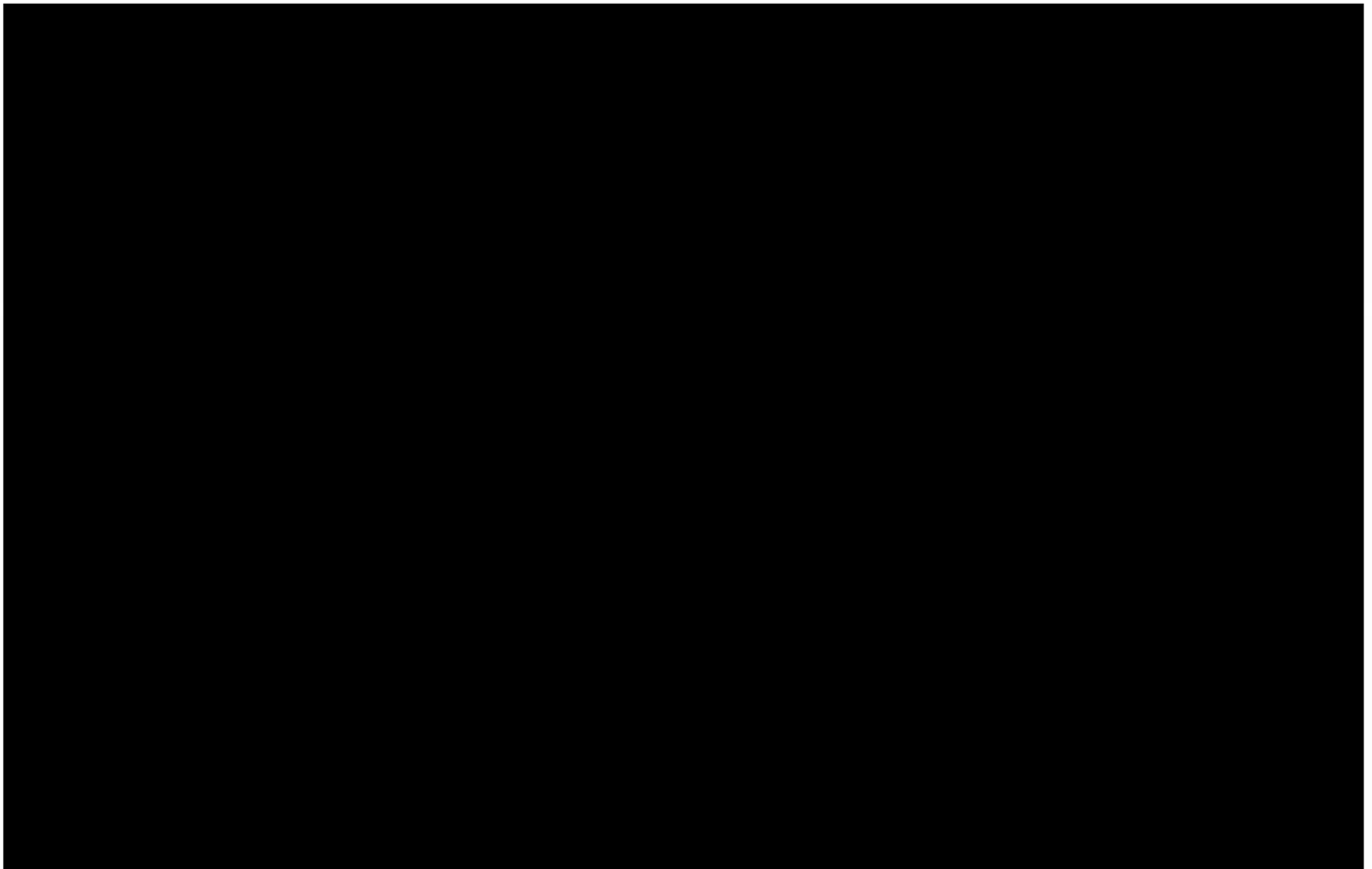
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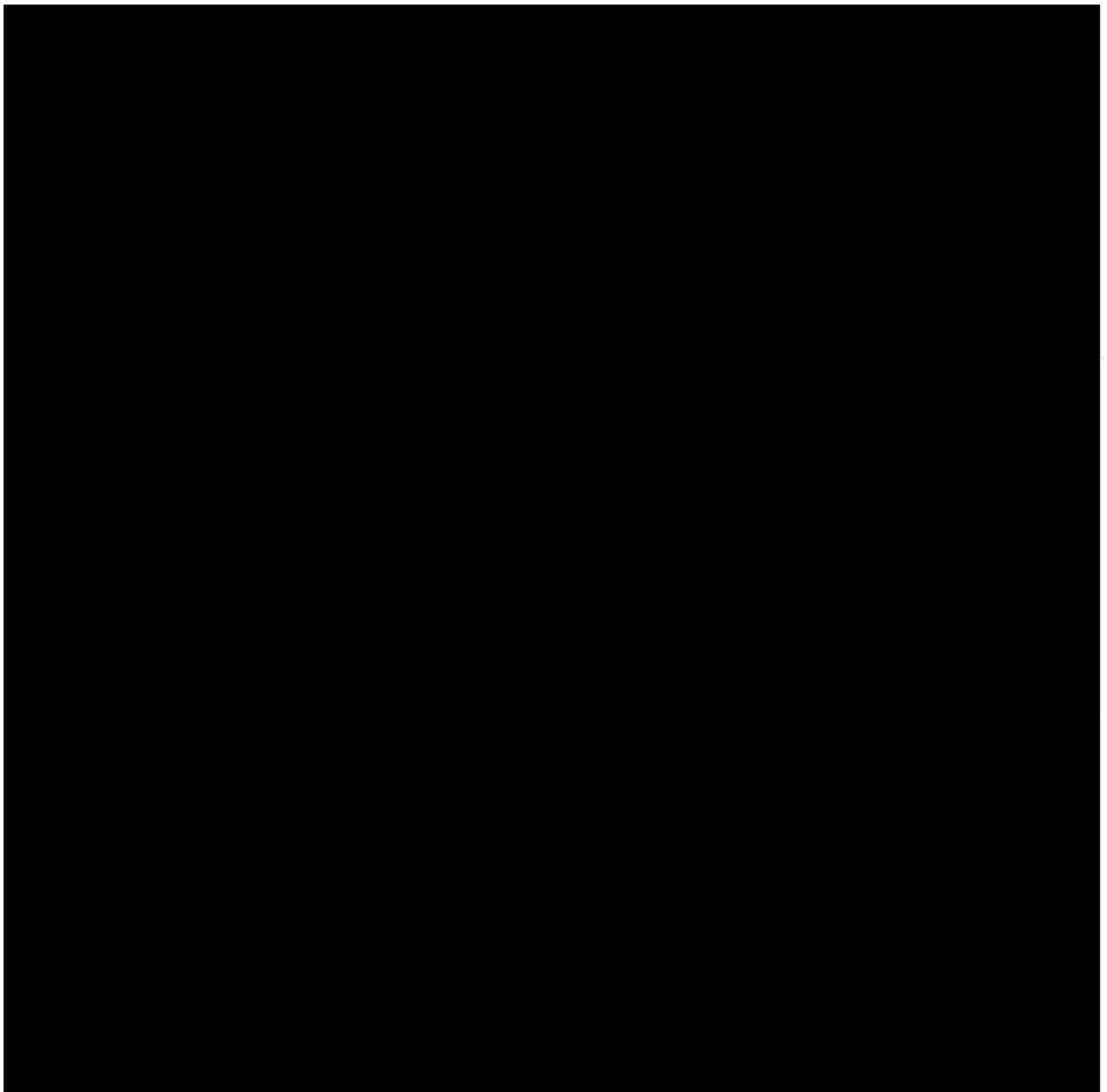
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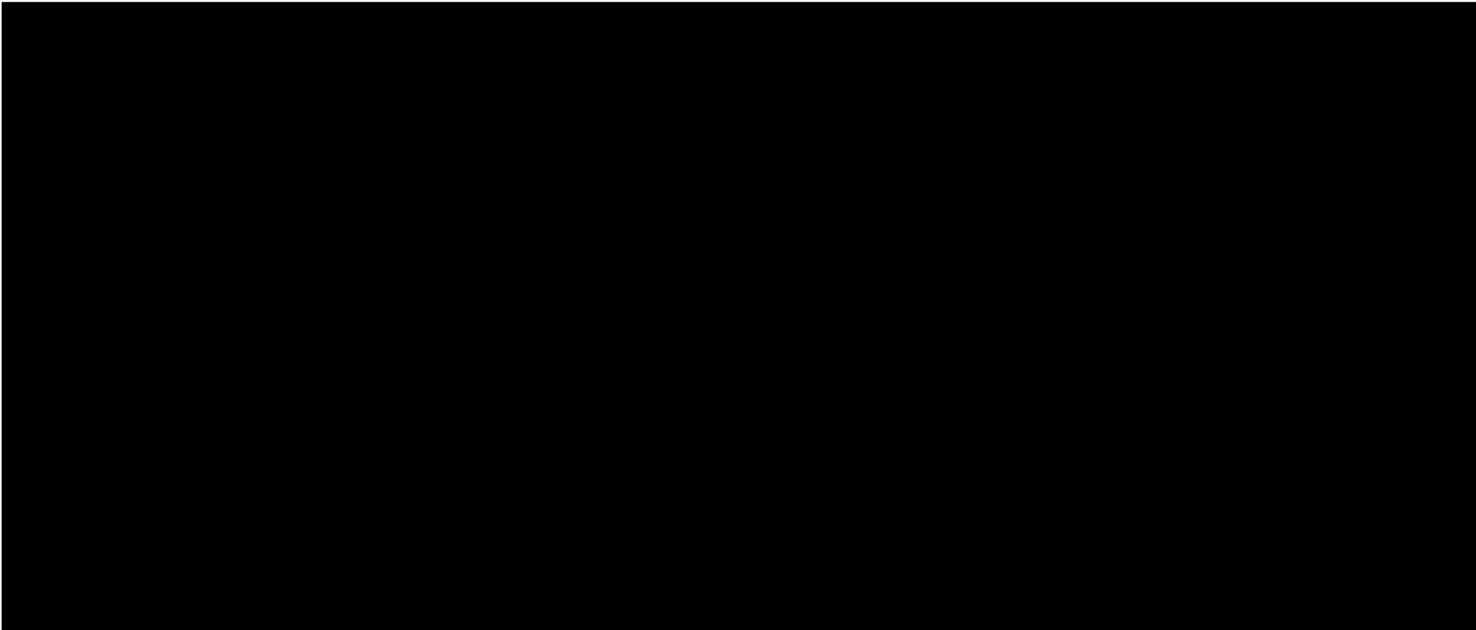
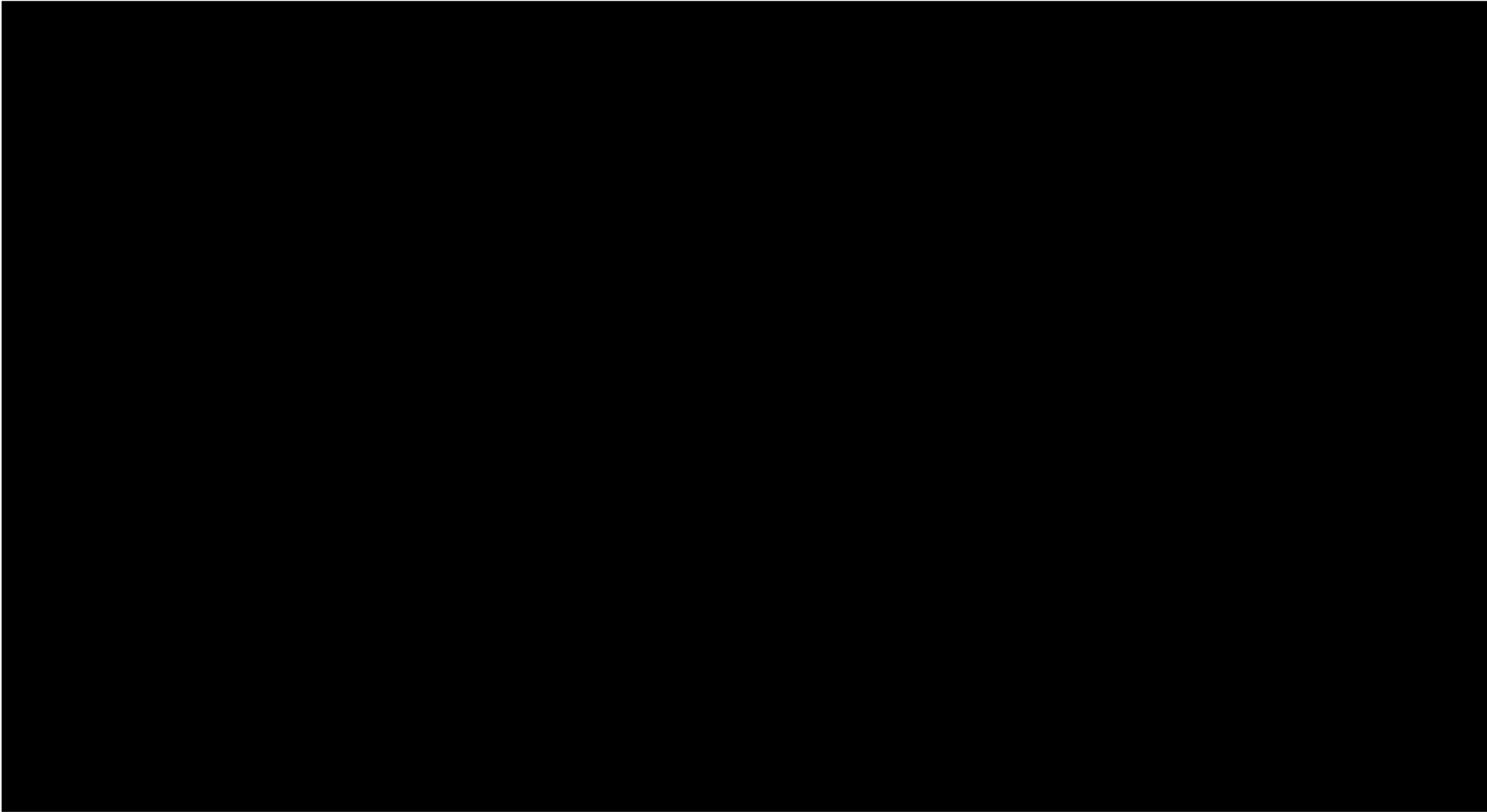


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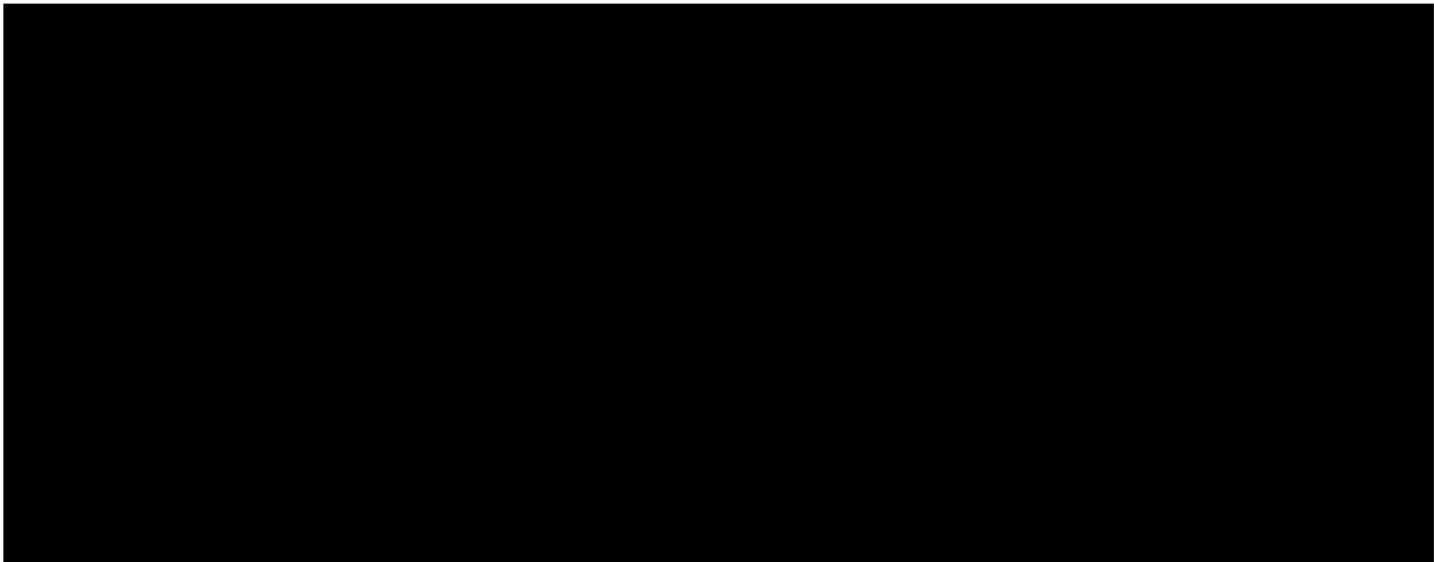


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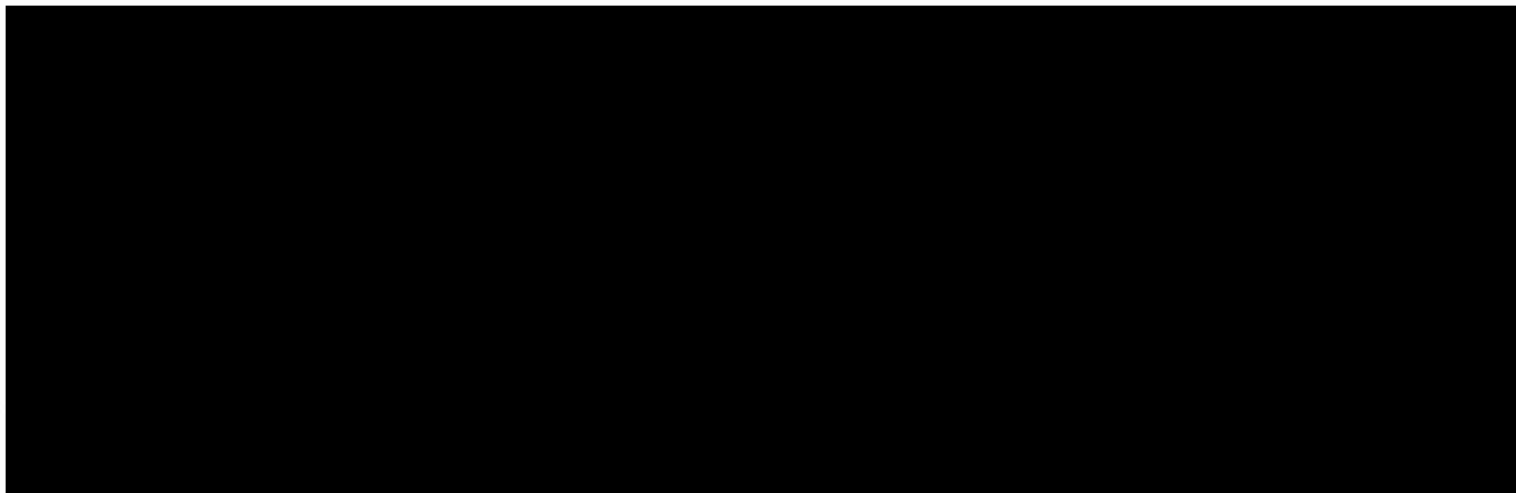
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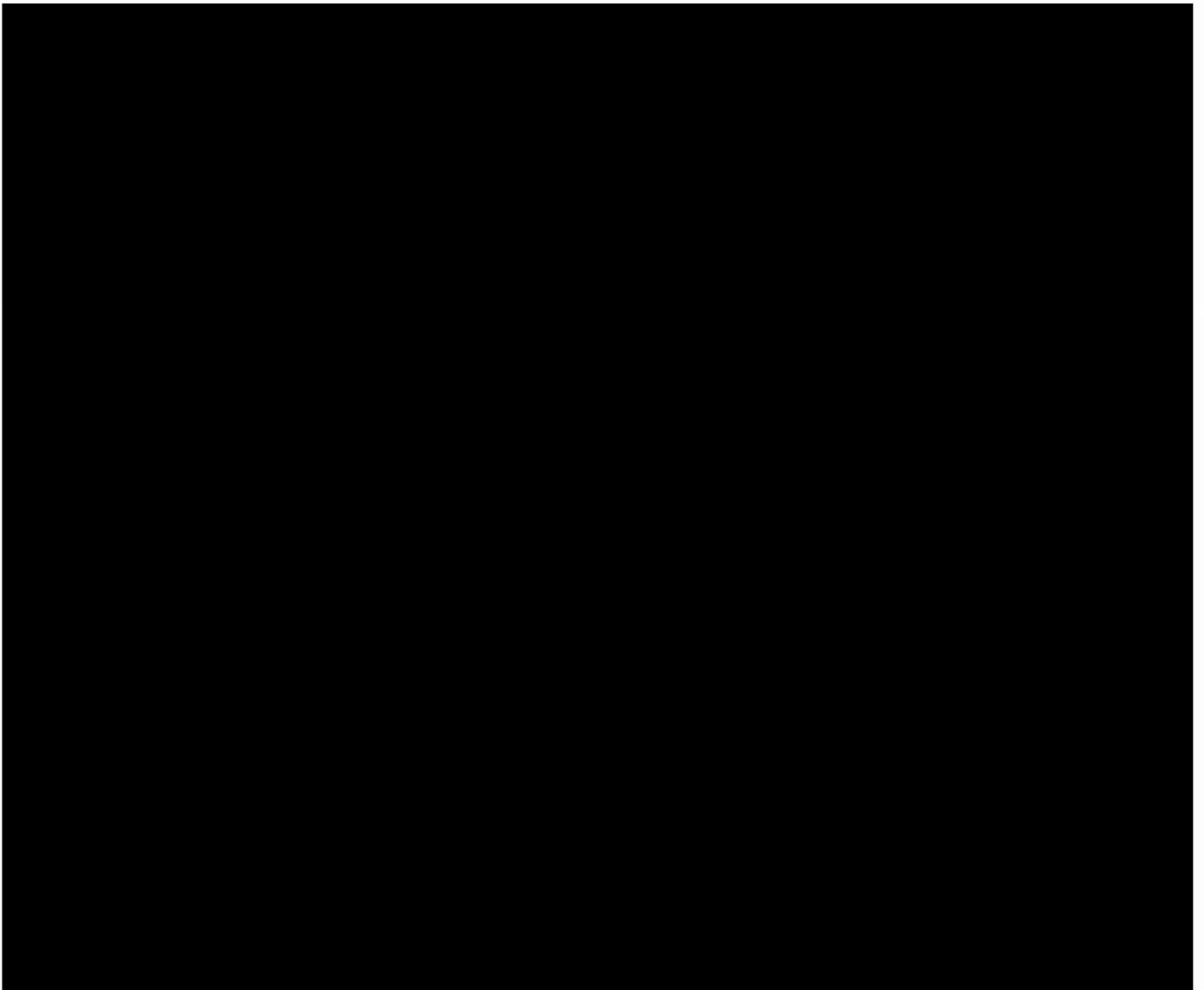












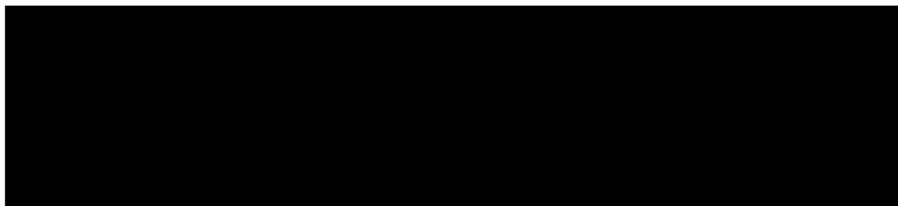


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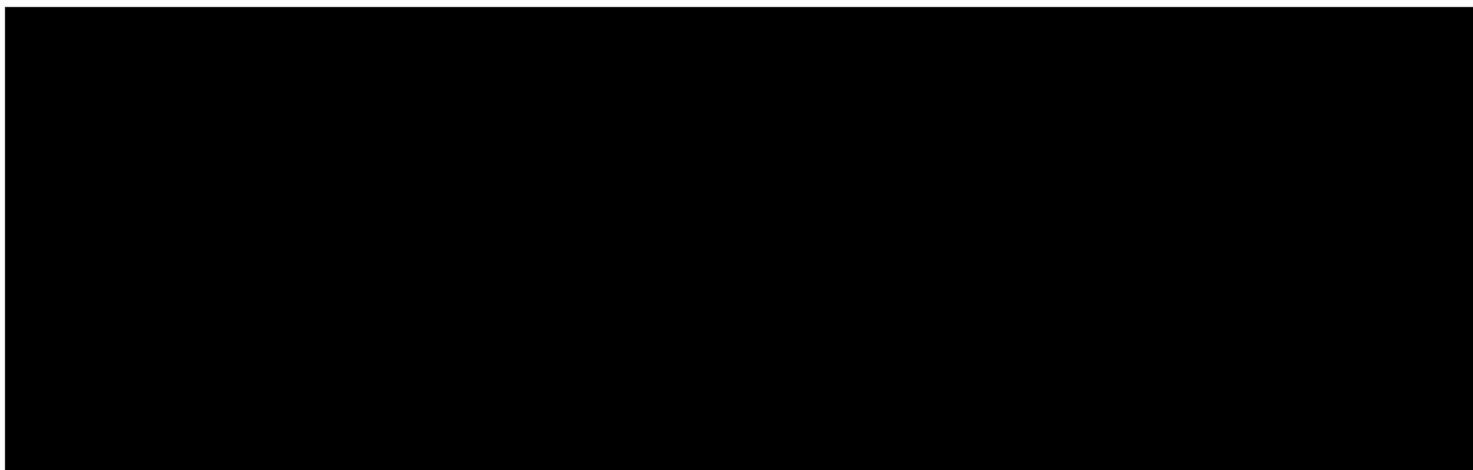
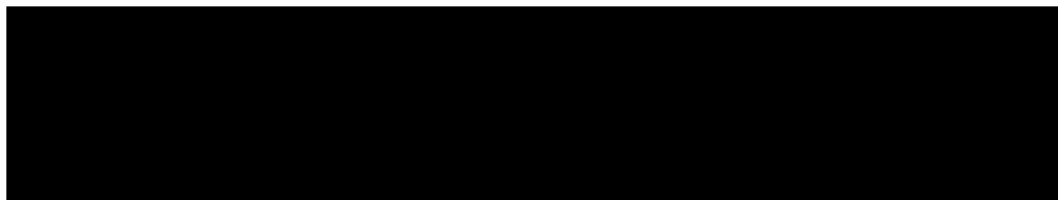
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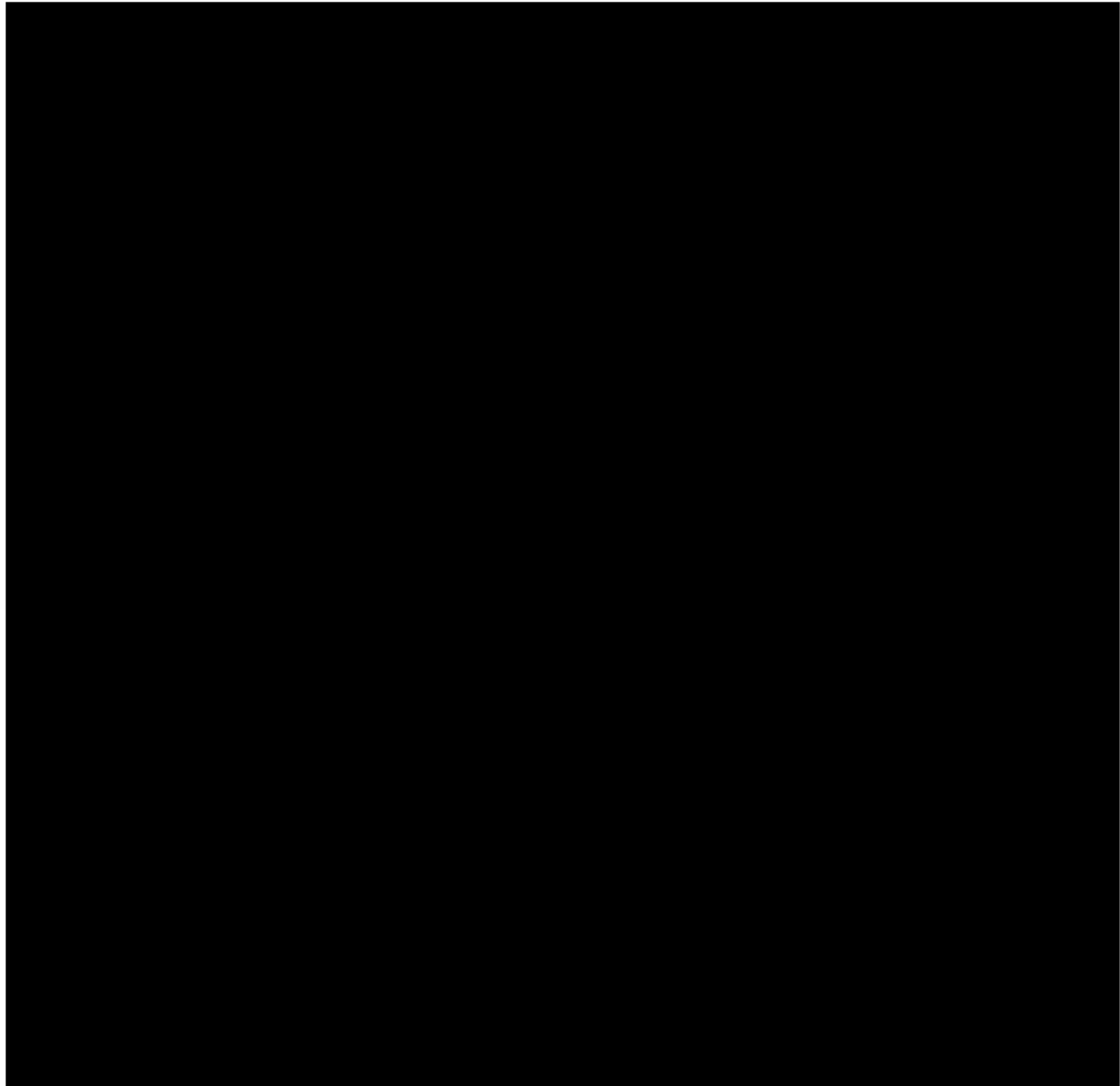
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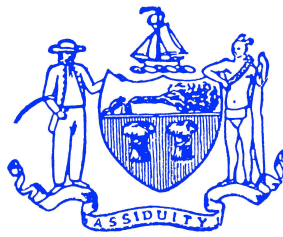
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**LETTERS**  
— F O R —  
t r u m p



**CITY OF ALBANY  
COMMON COUNCIL**

**Council Member 11<sup>th</sup> Ward**

Judd W. Krasher  
375 Manning Boulevard  
Albany, New York 12206

TELEPHONE: 518-364-5006  
FAX: 518 434-5081  
COUNCILMANKRASHER@GMAIL.COM

**MEMBER**  
COUNCIL OPERATIONS AND  
ETHICS  
  
LAW, BUILDINGS AND CODE  
ENFORCEMENT  
  
GENERAL SERVICES,  
HEALTH AND ENVIRONMENT

August 23, 2016

Rev. Franklin Graham  
P.O. Box 3000  
Boone, NC 28607  
VIA EMAIL

Dear Rev. Graham:

I welcome you in advance to the City of Albany.

This is the second welcome letter I have had to write this year to a bigoted, Islamophobic, and homophobic man. The first was to Donald J. Trump when he decided to come to Albany to preach his own hate.

This one is for you, Reverend. I am looking forward to joining with members of the Muslim and LGBTQ communities to make full use of our own First Amendment free speech rights to counter your delusional rhetoric. Before you utter a single word in Capitol Park, allow me to explain what Albany is about.

In Albany, we believe that diversity is one of our greatest strengths. We welcome people from all over the world with open arms. We embrace the cherished American freedom to freely express one's religious beliefs. That includes Muslims. We are a city that embraces equal treatment of the LGBT community. In fact, we are consistently ranked as one of the nation's most LGBT-friendly cities.

In the wake of the massacre at Orlando, the show of unity in Albany highlighted what Albany is about. I, along with members of the LGBT and Muslim communities and their allies, stood in front of Masjid al-Salam, a prominent Albany mosque. We stood together to stand with love and condemn hate. It is an experience I will never forget.

Cultural and religious diversity are cornerstones in Albany. They are sources of hope and pride. Many of the people you attack are the people that help build Albany structurally and spiritually. Your words will change nothing. The City of Albany will continue to lead the charge in ensuring equal treatment and protection for all.

Lastly, Reverend, I know many Christians of many denominations. Not a single one shares your twisted, convoluted interpretations. Your use of a religion as a vehicle to advance xenophobia and homophobia is appalling.

I submit to you that a man so eager to travel the United States to spread these messages should look inward. There are several scientific studies that indicate those who protest the most against the LGBT community are themselves LGBT.

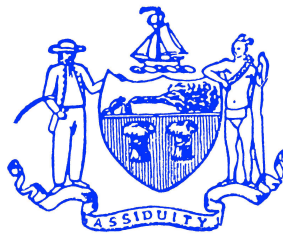
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Sincerely,

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JUDD W. KRASHER  
Council Member  
11th Ward | City of Albany

cc: The Internet



**CITY OF ALBANY  
COMMON COUNCIL**

**Council Member 11<sup>th</sup> Ward**

Judd W. Krasher  
375 Manning Boulevard  
Albany, New York 12206

TELEPHONE: 518-364-5006  
FAX: 518 434-5081  
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11th Ward | City of Albany

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## OFFICERS

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Hon. André Carson  
First Vice Chair

Hon. Karen Bass  
Second Vice Chair

Hon. Brenda Lawrence  
Secretary

Hon. Gwen Moore  
Whip

Hon. Anthony Brown  
Parliamentarian

Hon. Yvette D. Clarke  
Member-At-Large

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Hon. Yvette D. Clarke, NY - '07  
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Hon. Marcia L. Fudge, OH - '08  
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Hon. Cedric Richmond, LA - '11  
Hon. Terri Sewell, AL - '11  
Hon. Frederica Wilson, FL - '11  
Hon. Donald M. Payne, Jr., NJ - '12  
Hon. Joyce Beatty, OH - '13  
Hon. Hakeem Jeffries, NY - '13  
Hon. Marc Veasey, TX - '13  
Hon. Robin Kelly, IL - '13  
Hon. Cory Booker, NJ - '13  
Hon. Alma Adams, NC - '14  
Hon. Brenda Lawrence, MI - '15  
Hon. Mia Love, UT - '15  
Hon. Stacey Plaskett, VI - '15  
Hon. Bonnie Watson Coleman, NJ - '15  
Hon. Dwight Evans, PA - '16  
Hon. Kamala D. Harris, CA - '17  
Hon. Lisa Blunt Rochester, DE - '17  
Hon. Anthony Brown, MD - '17  
Hon. Val Demings, FL - '17  
Hon. Al Lawson, FL - '17  
Hon. A. Donald McEachin, VA - '17



September 27, 2017

President Donald Trump  
The White House  
1600 Pennsylvania Avenue NW  
Washington, DC 20050

Dear President Trump:

I write today to express my utter disgust with your handling of race relations in America in general and, more specifically, your calculated, divisive response to nationwide demonstrations against police brutality and racial injustice by professional football players, owners, coaches, and countless other patriots. African Americans are just as patriotic as any other American. We have fought in every war from the American Revolution to Iraq and Afghanistan, only to come home to a country that has yet to reconcile deep-seated issues of race, inequality, and injustice.

As President of the United States, your use of profane, sexually derogatory language in addressing American citizens, or anyone for that matter, is unbecoming of the office you now hold. Moreover, your complete lack of understanding of or empathy for the very painful history and substantive policy concerns that move people like Colin Kaepernick to take a stand, or a knee, in the first place is a reminder of all the African American community has to lose under your Administration. Nonetheless, as Chairman of the Congressional Black Caucus (CBC), an organization with the well-deserved reputation as the Conscience of the Congress, I feel obligated to yet again attempt to educate you and your Administration about the many problems facing our communities and how you can work with us to improve them.

As you may recall, I, along with senior leadership within the CBC, met with you on March 22, 2017. In that meeting, we presented you with a 125-page policy book, as well as a letter addressed to Attorney General Jeff Sessions from Judiciary Committee Ranking Member John Conyers, the Dean of the House, and myself. Both the policy book and the letter to Attorney General Sessions provided much-needed insight into our legitimate concerns with the criminal justice system, racial profiling, and police brutality, among many other issues. Not only did you and Attorney General Sessions fail to respond to either document in any substantive way, your actions continue to suggest that our pleas for responsible policy solutions were completely disregarded.

For example, Attorney General Sessions has initiated a second failed war on drugs that will wreck the Black community, an over-policed population, and only exacerbate our nation's shameful mass incarceration problem. The painful irony that Black drug users are treated as criminals while White opioid addicts receive a multi-million-dollar federal public health response is not lost on me or the millions of African Americans that CBC Members represent. You personally add insult to injury with the racist dog whistles you employ, such as calling for "law and order" in underserved, neglected communities across America while concurrently encouraging police brutality. The actions taken by you and your Administration in the short time you have been in office have already caused serious harm to our constituents and the vulnerable communities for whom we speak.

When we met, you claimed you cared for our communities. At the time, we provided you with several solutions that you could have discussed with us in order to prove that you were not just blowing smoke. Since our meeting, you have done nothing to help our communities and have taken affirmative actions that have harmed our communities. Almost everything you have done and said on the topic of race or on issues that implicate race demonstrate a shocking lack of knowledge for an adult public official in the 21<sup>st</sup> century. In hopes that the United States President would act with knowledge on these important issues, I have enclosed a copy of both the policy book, the letter to Attorney General Sessions, and a letter to Education Secretary DeVos that we provided you six months ago. I urge you to read these documents, since it is evident that you have not, and give serious thought to addressing the underlying concerns that give rise to the demonstrations you find so very disgraceful.

Sincerely,



Cedric Richmond  
Chair, Congressional Black Caucus

Enclosure

CC: Attorney General Jefferson Sessions  
Housing and Urban Development Secretary Ben Carson  
Education Secretary Betsy DeVos



## OFFICERS

Hon. Cedric Richmond  
Chair

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Hon. Al Lawson, FL - '17  
Hon. A. Donald McEachin, VA - '17



September 27, 2017

President Donald Trump  
The White House  
1600 Pennsylvania Avenue NW  
Washington, DC 20050

Dear President Trump:

I write today to express my utter disgust with your handling of race relations in America in general and, more specifically, your calculated, divisive response to nationwide demonstrations against police brutality and racial injustice by professional football players, owners, coaches, and countless other patriots. African Americans are just as patriotic as any other American. We have fought in every war from the American Revolution to Iraq and Afghanistan, only to come home to a country that has yet to reconcile deep-seated issues of race, inequality, and injustice.


As President of the United States, your use of profane, sexually derogatory language in addressing American citizens, or anyone for that matter, is unbecoming of the office you now hold. Moreover, your complete lack of understanding of or empathy for the very painful history and substantive policy concerns that move people like Colin Kaepernick to take a stand, or a knee, in the first place is a reminder of all the African American community has to lose under your Administration. Nonetheless, as Chairman of the Congressional Black Caucus (CBC), an organization with the well-deserved reputation as the Conscience of the Congress, I feel obligated to yet again attempt to educate you and your Administration about the many problems facing our communities and how you can work with us to improve them.

As you may recall, I, along with senior leadership within the CBC, met with you on March 22, 2017. In that meeting, we presented you with a 125-page policy book, as well as a letter addressed to Attorney General Jeff Sessions from Judiciary Committee Ranking Member John Conyers, the Dean of the House, and myself. Both the policy book and the letter to Attorney General Sessions provided much-needed insight into our legitimate concerns with the criminal justice system, racial profiling, and police brutality, among many other issues. Not only did you and Attorney General Sessions fail to respond to either document in any substantive way, your actions continue to suggest that our pleas for responsible policy solutions were completely disregarded.

For example, Attorney General Sessions has initiated a second failed war on drugs that will wreck the Black community, an over-policed population, and only exacerbate our nation's shameful mass incarceration problem. The painful irony that Black drug users are treated as criminals while White opioid addicts receive a multi-million-dollar federal public health response is not lost on me or the millions of African Americans that CBC Members represent. You personally add insult to injury with the racist dog whistles you employ, such as calling for "law and order" in underserved, neglected communities across America while concurrently encouraging police brutality. The actions taken by you and your Administration in the short time you have been in office have already caused serious harm to our constituents and the vulnerable communities for whom we speak.

When we met, you claimed you cared for our communities. At the time, we provided you with several solutions that you could have discussed with us in order to prove that you were not just blowing smoke. Since our meeting, you have done nothing to help our communities and have taken affirmative actions that have harmed our communities. Almost everything you have done and said on the topic of race or on issues that implicate race demonstrate a shocking lack of knowledge for an adult public official in the 21<sup>st</sup> century. In hopes that the United States President would act with knowledge on these important issues, I have enclosed a copy of both the policy book, the letter to Attorney General Sessions, and a letter to Education Secretary DeVos that we provided you six months ago. I urge you to read these documents, since it is evident that you have not, and give serious thought to addressing the underlying concerns that give rise to the demonstrations you find so very disgraceful.

Sincerely,



Cedric Richmond  
Chair, Congressional Black Caucus

Enclosure

CC: Attorney General Jefferson Sessions  
Housing and Urban Development Secretary Ben Carson  
Education Secretary Betsy DeVos

# C A M P A I G N F O R ACCOUNTABILITY

August 30, 2016

## BY EMAIL

Raymond Hulser  
Chief, Public Integrity Section  
U.S. Department of Justice  
950 Pennsylvania Avenue, N.W.  
Washington, D.C. 20530-2001

Re: Request for Investigation of Donald J. Trump

Dear Mr. Hulser:

Campaign for Accountability (CfA) respectfully requests that the Public Integrity Section investigate presidential candidate Donald J. Trump to determine if he violated 18 U.S.C. § 1001 and § 104 of the Ethics in Government Act, 5 U.S.C. App. § 104, by knowingly making material false statements in two financial disclosure forms he submitted in July 2015 and May 2016. Publicly available information indicates that, on both forms, Mr. Trump may have falsely represented the value of certain of his assets and the income some of those assets generated, suggesting a pattern of misreporting.

### Background

On July 15, 2015, Mr. Trump submitted to the Federal Election Commission his Executive Branch Personnel Public Disclosure Report (OGE Form 278e) pursuant to 5 U.S.C. App. § 101(c) and 5 C.F.R. § 2634.201(d). Those provisions require all candidates for the office of President to file financial disclosure forms within 30 days of becoming a candidate, and by May 15 of every year thereafter in which they continue to be a candidate. On May 16, 2016, Mr. Trump submitted a second financial disclosure form. After the FEC completed its review of these forms for “apparent compliance with the Federal Election Campaign Act,” they were sent to the Office of Government Ethics, where they are now publicly available upon request.<sup>1</sup>

Mr. Trump’s 2015 financial disclosure form contains 19 pages of employment assets and income that include 16 golf courses he has valued collectively at more than \$550 million.<sup>2</sup> Similarly, his 2016 financial disclosure form lists assets that also include 16 golf courses valued collectively at more than \$550 million. Numerous news articles have revealed that

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<sup>1</sup> The Office of Government Ethics provided CfA with copies of both of Mr. Trump’s financial disclosure forms, which are available at <https://www.documentcloud.org/documents/3035802-Donald-Trump-2015-Financial-Disclosure.html>; <https://www.documentcloud.org/documents/3035803-Donald-Trump-2016-Financial-Disclosure.html>.

<sup>2</sup> Of note, the form requests valuation in categories, with the top category being more than \$50 million, making it impossible to derive an exact valuation of the worth of his 16 golf courses from this form alone.

Mr. Trump's financial disclosure forms appear to vastly overstate the value of these golf courses and the revenue they have generated. A comparison of the apparently hyper-inflated valuations of Mr. Trump's assets in his FEC filings with the valuations submitted to local and state authorities for tax purposes reveals that many of his courses appear to be worth tens of millions of dollars less than the valuations listed on his financial disclosure forms.

For example, on both his 2015 and 2016 financial disclosure forms, Mr. Trump valued the Trump National Golf Club Jupiter in Jupiter, Florida, at more than \$50 million. But shortly before he submitted his 2016 filing, Mr. Trump's attorney argued to the Palm Beach County the property was "worth no more than \$5 million," a claim Mr. Trump's lawyers had made three years in a row in court challenges to the county's assessment.<sup>3</sup>

Similarly, on both his 2015 and 2016 filings, Mr. Trump valued the Trump National Golf Club-Los Angeles at over \$50 million. Although Mr. Trump initially claimed he purchased the course for \$264 million in 2006, two years later his representatives claimed before the Los Angeles County Assessor it was worth only \$10 million.<sup>4</sup> Reportedly the current appraisal is \$15 million,<sup>5</sup> not the more than \$50 million Mr. Trump claimed on his financial disclosure forms.

Mr. Trump followed this same playbook with respect to Trump National-Westchester, which he valued at over \$50 million on his financial disclosure forms. But the Town of Ossining, where the course is located, appraised it at \$14.3 million for tax purposes, and Mr. Trump is claiming for tax purposes its actual worth is a much lower \$1.4 million.<sup>6</sup>

Beyond these examples, there are differences in valuation with respect to golf courses Mr. Trump owns abroad. In both his 2015 and 2016 financial disclosure forms, Mr. Trump placed a value of over \$50 million on his Trump International Golf Links-Scotland in Aberdeen and claimed income of \$4,349,651 in his 2015 filing and \$4,880,743 in his 2016

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<sup>3</sup> Drew Harwell, *Trump Claims His Golf Courses Are Worth Tens of Millions. Until the Tax Bill Arrives*, *Washington Post*, August 21, 2016 (quoting unnamed attorney), available at [https://www.washingtonpost.com/politics/how-much-does-trump-claim-his-golf-courses-are-worth-it-depends-who-needs-to-know/2016/08/21/71828f3a-5f3c-11e6-9d2f-b1a3564181a1\\_story.html](https://www.washingtonpost.com/politics/how-much-does-trump-claim-his-golf-courses-are-worth-it-depends-who-needs-to-know/2016/08/21/71828f3a-5f3c-11e6-9d2f-b1a3564181a1_story.html).

<sup>4</sup> Gene Maddaus, *Donald Trump's Palos Verdes Golf Course Has Holes in It*, *Variety*, June 9, 2016, available at <http://variety.com/2016/biz/news/donald-trump-national-golf-club-palos-verdes-golf-course-value-1201791482/>.

<sup>5</sup> *Id.*

<sup>6</sup> Peter Bukowski, *How Donald Trump's Golf Game Leaves Local Governments in the Rough*, *Fortune*, May 17, 2016, available at <http://fortune.com/2016/05/17/donald-trump-golf-taxes-mar-a-lago-national-golf-day/>. In a graphic, this same article also highlights the gaps between the tax assessed value and the value as reported to the FEC for, *inter alia*, Trump National Golf Club-Colts Neck (between \$30 million and \$35 million versus over \$50 million); Trump National Golf Club-Washington, D.C. (between \$20 million and \$25 million versus over \$50 million); and Trump International Golf Club-Florida (between \$5 million and \$10 million versus over \$50 million). *Id.* The tax-assessed values were drawn from the Town of Ossining, the Palm Beach County property appraiser, and the counties of Miami-Dade, Florida, Loudon, Virginia (outside of Washington, D.C.), and Monmouth, New Jersey. *Id.*

filing. Sarah Malone, the executive vice president for the course, told *Vanity Fair* the club operated at a loss in 2014,<sup>7</sup> the period largely covered by Mr. Trump's 2015 financial disclosure form.<sup>8</sup> According to the official accounts the company filed with the Companies House, the British equivalent of the SEC, in 2014 Trump International Golf Club Scotland Limited claimed a net loss on the course of \$1.8 million, with revenues of \$4.4 million.<sup>9</sup>

Similar discrepancies exist for Trump Turnberry in Turnberry, Scotland. Mr. Trump valued this course at over \$50 million on both financial disclosure forms, and claimed it generated income of \$20,395,000 in the 2015 reporting period and \$18,186,951 in the 2016 reporting period. Once again, however, a very different financial picture was presented to the Companies House, where in 2014 Mr. Trump reported a loss of \$5.6 million on revenues of \$14.6 million.<sup>10</sup> This same pattern was repeated with the Trump International Golf Links-Doonbeg in Doonbeg, Ireland, for which Mr. Trump claimed income of \$10,755,683 on his 2015 financial disclosure form, while at the same time he reported a loss of \$3.3 million on revenues of \$4.7 million.<sup>11</sup> When pressed about these discrepancies, Mr. Trump has offered various explanations from characterizing the figure listed in the income column of the financial disclosure form as “a revenue number,” to claiming it represents “projected future income.”<sup>12</sup>

Beyond providing valuation and revenue numbers for specific courses that contrast sharply with those he provided local authorities for tax purposes, Mr. Trump has vastly overestimated the total value of his golf courses. Golf course appraisers generally value a golf course at 1 to 1.5 times the revenue it produces annually.<sup>13</sup> Applying either the 1 or 1.5 formula, Mr. Trump's 2015 golf empire, which he reported had generated combined revenue of less than \$160 million, was worth between \$160 million and \$250 million, *id.*, much less than the more than \$550 million he claimed.

Sales numbers bear this out. According to the Society of Golf Appraisers, “[i]n 2014, the average multiple of golf course sales was 1.4 times revenue[.]”<sup>14</sup> Further, as reported by

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<sup>7</sup> Nicholas Shaxson, The Great Trump Tax Mysteries: Is He Hiding Loopholes, Errors, or Something More Serious?, *Vanity Fair*, August 2016, available at <http://www.vanityfair.com/news/2016/06/the-great-trump-tax-mysteries>.

<sup>8</sup> The reporting period for first-time candidates for President is the previous calendar year together with the current calendar year up to the filing date. See Instructions for Completing OGE Form 278, available at [https://www.usaid.gov/sites/default/files/documents/1869/OGE-278%20\(Public%20Financial%20Disclosure%20Report\).pdf](https://www.usaid.gov/sites/default/files/documents/1869/OGE-278%20(Public%20Financial%20Disclosure%20Report).pdf). As the *Vanity Fair* article notes, the period in 2015 covered by Mr. Trump's 2015 filing included three months when the course was closed for the winter. Shaxson, *Vanity Fair*, Aug. 2016.

<sup>9</sup> *Id.*

<sup>10</sup> *Id.*

<sup>11</sup> *Id.*

<sup>12</sup> Shaxson, *Vanity Fair*, Aug. 2016 (quoting Donald Trump).

<sup>13</sup> Tim Mullaney, Trump's \$550 M Golf Empire May Be in the Weeds: Experts, *cnbc.com*, July 23, 2015, available at <http://www.cnbc.com/2015/07/23/trumps-550m-golf-empire-may-be-in-the-weeds-experts.html>; see also Donald Trump's Financial Disclosure Report Values Golf Courses at a Minimum of \$500 Million, *Golf Digest*, July 24, 2015, available at <http://www.golfdigest.com/story/donald-trumps-financial-disclo> (same).

<sup>14</sup> Mullaney, *cnbc.com*, Jul. 23, 2015.

CNBC, in 2013, according to the Society of Golf Appraisers, “[n]o golf course in America sold for as much as \$50 million[.]”<sup>15</sup> In 2015, CNL Lifestyle Properties sold a portfolio of 48 golf courses, which had generated revenues of \$158 million in 2013, for \$320 million.<sup>16</sup> Two months later another company paid \$265 million for a portfolio of 50 golf courses that had generated annual revenues of around \$100 million.<sup>17</sup>

### Violations

Under a provision of the Ethics in Government Act, 5 U.S.C. App. § 101(c), every candidate for the office of President must file with the FEC a report containing information prescribed by 5 U.S.C. App. § 102 within 30 days of becoming a candidate, and thereafter by May 15 of the successive years in which the individual remains a candidate. Section 102 requires a “full and complete statement” of specified categories of assets, income, gifts, and liabilities for the candidate, the candidate’s spouse, and each dependent child, using certain dollar figure categories ranging from a minimum of not more than \$1,000 to a maximum of greater than \$50 million for certain types of assets. 5 U.S.C. App. §§ 102(a)-(d).

It is unlawful to either fail to file the required disclosures or knowingly and willfully file any false information that section 102 requires. 5 U.S.C. App. § 104(a). Section 104 authorizes the attorney general to bring a civil action for penalties, not to exceed \$50,000, for a knowing and willful falsification of the required information. Further, as the implementing regulation, 5 C.F.R. § 2634.701(c) notes, “[a]n individual may be prosecuted under criminal statutes for supplying false information on any financial disclosure report.”

The applicable criminal statute, 18 U.S.C. § 1001(a), makes it a criminal offense to “knowingly and willfully . . . make[] or use[] any false writing or document knowing the same to contain any materially false, fictitious, or fraudulent statement or entry.” Violations are subject to fines or imprisonment of not more than five years. *Id.* The purpose of this provision is “to protect the authorized functions of government departments and agencies from the perversion which might result from” material false representations. *United States v. Gilliland*, 312 U.S. 86, 93-94 (1941). Consistent with these requirements, the financial disclosure form requires the following certification from the filer: “I certify that the statements I have made in this report are true, complete and correct to the best of my knowledge.”

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<sup>15</sup> *Id.*

<sup>16</sup> Patrick Clark, *In Defense of Donald Trump*, *Bloomberg.com*, July 28, 2015, available at <http://www.bloomberg.com/news/articles/2015-07-28/in-defense-of-donald-trump-as-a-golf-course-owner->.

<sup>17</sup> *Id.* Based on the information publicly available, it is difficult to determine whether the valuation differences may be due to company assessed real estate values or a valuation of the businesses as ongoing concerns. DOJ, with subpoena power, is in a position to demand the documentation necessary to determine whether or not Mr. Trump made false representations regarding the value of the golf courses.

The Office of Government Ethics has issued detailed instructions for completing the required financial disclosure forms. The OGE explains,

it is important that you carefully complete the attached form. This report is a safeguard for you as well as the Government, in that it provides a mechanism for determining actual or potential conflicts between our public responsibilities and your private interests and activities and allows you . . . to fashion appropriate protections against such conflicts when they first appear.

Instructions for Completing OGE Form 278, Scope of Disclosure, at 1.

Those instructions also lay out eight acceptable methods for determining fair market value. As relevant here they include: (1) a good faith estimate “if the exact value is unknown or not easily obtainable”; (2) “value based upon a recent appraisal of the property interest”; (3) the purchase price; or (4) the assessed tax value “adjusted to reflect current market value if the tax assessment is computed at less than 100% of current value.” *Id.*, Definition of Terms, Value.

The OGE instructions also warn all filers:

Knowing and willful falsification of information, or failure to report information required by section 102 of the Act, may subject you to a civil monetary penalty . . . or other appropriate authority under section 104 of the Act. Knowing and willful falsification of information required to be filed by section 102 of the Act may also subject you to criminal prosecution.

*Id.*, Privacy Act Statement.

#### *Mr. Trump Appears to Have Made Material False Statements*

Applying any of the valuation methods OGE has prescribed, based on public information, it appears that Mr. Trump’s financial disclosure forms significantly overstate the value of his golf courses and, in at least some cases the revenues they have generated. First, even if their value is “unknown or not easily obtainable,” *id.*, a valuation that is tens of millions of dollars in excess of the tax-appraised value cannot reasonably be construed as “a good faith estimate.” *Id.* In any event, Mr. Trump cannot claim credibly the value of his courses cannot easily be ascertained, as demonstrated by an examination of comparable courses. For example, while Mr. Trump has claimed his Bedminster course is worth more

than \$50 million – a figure “about twice its tax-assessment value of \$27.8 million” – another course 14 miles away was on the market in 2015 for \$2.5 million.<sup>18</sup>

Second, there is no indication that any of Mr. Trump’s golf courses have been appraised at more than \$50 million. Indeed, if such appraisals had been made, they likely would have surfaced during Mr. Trump’s battles with state tax assessors. Third, Mr. Trump’s valuations do not square with the purchase prices of his courses. For example, Mr. Trump reportedly paid \$13 million for Trump National-Washington, D.C.,<sup>19</sup> well below the more than \$50 million value listed on his financial disclosure forms.

Finally, had Mr. Trump used the assessed tax value he would have reported golf course holdings valued at significantly less than the more than \$550 million he has claimed. As outlined above, in many states Mr. Trump has argued with state officials, insisting the tax value of his courses is a mere fraction of their assessed value, and certainly well below \$50 million. In Palm Beach, for example, he has argued his golf course is “worth no more than \$5 million” for tax purposes,<sup>20</sup> while assigning a value of over \$50 million on his 2015 and 2016 financial disclosure forms. This pattern is repeated with most of his courses. A review by the *Washington Post* of his golf course holdings revealed eight of 10 courses Mr. Trump owns in the United States have actual assessed values that are “far lower” than what he claimed in his financial disclosure forms.<sup>21</sup>

#### *Mr. Trump Appears to Have Knowingly and Willfully Made False Statements*

In two separate filings, Mr. Trump appears to have repeatedly and significantly overstated the values of his golf courses and, in some instances, the revenues they produced, despite a plethora of news articles pointing out how far afield his valuations are. Given Mr. Trump’s claims of exceptional business prowess and savvy, he certainly cannot claim ignorance.

In a similar vein, as the *Washington Post* has reported, Mr. Trump appears to have vastly misrepresented the amounts he has given to charity; of the 4,844 donations (totaling \$102 million) he claims to have made, none, it seems, were made with his own money.<sup>22</sup>

That Mr. Trump may play fast and loose with the truth in the political arena and uses every available loophole to avoid paying his fair share of taxes, all in an apparent effort to project an image of a far more successful businessman than he may really be, does not give him a license to deliberately overstate the value of his golf courses in forms submitted to the federal government in which accuracy is legally required. Allowing Mr. Trump to so flagrantly flout the requirements of 5 U.S.C. App. § 101(c) would undermine the process

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<sup>18</sup> Mullaney, *cnn.com*, Jul. 23, 2015.

<sup>19</sup> *Id.*

<sup>20</sup> Harwell, *Washington Post*, Aug. 21, 2016.

<sup>21</sup> *Id.*

<sup>22</sup> *Id.*



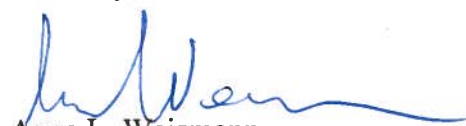
Raymond Hulser  
August 30, 2016  
Page 7

Congress put in place to “to protect the authorized functions of governmental departments and agencies[.]” *United States v. Gilliland*, 312 U.S. at 93-94. Nor can his conduct be excused or ignored as “no harm, no foul” because he overstated, rather than understated, the value of his golf portfolio. Nowhere does the Ethics in Government Act, its implementing regulations, or OGE guidance even suggest, much less permit, false statements of any kind.

### **Conclusion**

For the foregoing reasons, CfA respectfully requests that you commence an investigation of Donald Trump for apparent violations of 18 U.S.C. § 1001 and § 104 of the Ethics in Government Act, 5 U.S.C. App. § 104. We understand the sensitivity of undertaking such an investigation in the middle of a presidential campaign, but the integrity of the financial disclosure system and the interests it serves are at risk if Mr. Trump is not held accountable for his actions.

Sincerely,



Anne L. Weismann  
Executive Director

# C A M P A I G N F O R ACCOUNTABILITY

August 30, 2016

## BY EMAIL

Raymond Hulser  
Chief, Public Integrity Section  
U.S. Department of Justice  
950 Pennsylvania Avenue, N.W.  
Washington, D.C. 20530-2001

Re: Request for Investigation of Donald J. Trump

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<sup>3</sup> Drew Harwell, *Trump Claims His Golf Courses Are Worth Tens of Millions. Until the Tax Bill Arrives*, *Washington Post*, August 21, 2016 (quoting unnamed attorney), available at [https://www.washingtonpost.com/politics/how-much-does-trump-claim-his-golf-courses-are-worth-it-depends-who-needs-to-know/2016/08/21/71828f3a-5f3c-11e6-9d2f-b1a3564181a1\\_story.html](https://www.washingtonpost.com/politics/how-much-does-trump-claim-his-golf-courses-are-worth-it-depends-who-needs-to-know/2016/08/21/71828f3a-5f3c-11e6-9d2f-b1a3564181a1_story.html).

<sup>4</sup> Gene Maddaus, *Donald Trump's Palos Verdes Golf Course Has Holes in It*, *Variety*, June 9, 2016, available at <http://variety.com/2016/biz/news/donald-trump-national-golf-club-palos-verdes-golf-course-value-1201791482/>.

<sup>5</sup> *Id.*

<sup>6</sup> Peter Bukowski, *How Donald Trump's Golf Game Leaves Local Governments in the Rough*, *Fortune*, May 17, 2016, available at <http://fortune.com/2016/05/17/donald-trump-golf-taxes-mar-a-lago-national-golf-day/>. In a graphic, this same article also highlights the gaps between the tax assessed value and the value as reported to the FEC for, *inter alia*, Trump National Golf Club-Colts Neck (between \$30 million and \$35 million versus over \$50 million); Trump National Golf Club-Washington, D.C. (between \$20 million and \$25 million versus over \$50 million); and Trump International Golf Club-Florida (between \$5 million and \$10 million versus over \$50 million). *Id.* The tax-assessed values were drawn from the Town of Ossining, the Palm Beach County property appraiser, and the counties of Miami-Dade, Florida, Loudon, Virginia (outside of Washington, D.C.), and Monmouth, New Jersey. *Id.*

filing. Sarah Malone, the executive vice president for the course, told *Vanity Fair* the club operated at a loss in 2014,<sup>7</sup> the period largely covered by Mr. Trump's 2015 financial disclosure form.<sup>8</sup> According to the official accounts the company filed with the Companies House, the British equivalent of the SEC, in 2014 Trump International Golf Club Scotland Limited claimed a net loss on the course of \$1.8 million, with revenues of \$4.4 million.<sup>9</sup>

Similar discrepancies exist for Trump Turnberry in Turnberry, Scotland. Mr. Trump valued this course at over \$50 million on both financial disclosure forms, and claimed it generated income of \$20,395,000 in the 2015 reporting period and \$18,186,951 in the 2016 reporting period. Once again, however, a very different financial picture was presented to the Companies House, where in 2014 Mr. Trump reported a loss of \$5.6 million on revenues of \$14.6 million.<sup>10</sup> This same pattern was repeated with the Trump International Golf Links-Doonbeg in Doonbeg, Ireland, for which Mr. Trump claimed income of \$10,755,683 on his 2015 financial disclosure form, while at the same time he reported a loss of \$3.3 million on revenues of \$4.7 million.<sup>11</sup> When pressed about these discrepancies, Mr. Trump has offered various explanations from characterizing the figure listed in the income column of the financial disclosure form as “a revenue number,” to claiming it represents “projected future income.”<sup>12</sup>

Beyond providing valuation and revenue numbers for specific courses that contrast sharply with those he provided local authorities for tax purposes, Mr. Trump has vastly overestimated the total value of his golf courses. Golf course appraisers generally value a golf course at 1 to 1.5 times the revenue it produces annually.<sup>13</sup> Applying either the 1 or 1.5 formula, Mr. Trump's 2015 golf empire, which he reported had generated combined revenue of less than \$160 million, was worth between \$160 million and \$250 million, *id.*, much less than the more than \$550 million he claimed.

Sales numbers bear this out. According to the Society of Golf Appraisers, “[i]n 2014, the average multiple of golf course sales was 1.4 times revenue[.]”<sup>14</sup> Further, as reported by

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<sup>7</sup> Nicholas Shaxson, [The Great Trump Tax Mysteries: Is He Hiding Loopholes, Errors, or Something More Serious?](http://www.vanityfair.com/news/2016/06/the-great-trump-tax-mysteries), *Vanity Fair*, August 2016, available at <http://www.vanityfair.com/news/2016/06/the-great-trump-tax-mysteries>.

<sup>8</sup> The reporting period for first-time candidates for President is the previous calendar year together with the current calendar year up to the filing date. See Instructions for Completing OGE Form 278, available at [https://www.usaid.gov/sites/default/files/documents/1869/OGE-278%20\(Public%20Financial%20Disclosure%20Report\).pdf](https://www.usaid.gov/sites/default/files/documents/1869/OGE-278%20(Public%20Financial%20Disclosure%20Report).pdf). As the *Vanity Fair* article notes, the period in 2015 covered by Mr. Trump's 2015 filing included three months when the course was closed for the winter. Shaxson, *Vanity Fair*, Aug. 2016.

<sup>9</sup> *Id.*

<sup>10</sup> *Id.*

<sup>11</sup> *Id.*

<sup>12</sup> Shaxson, *Vanity Fair*, Aug. 2016 (quoting Donald Trump).

<sup>13</sup> Tim Mullaney, [Trump's \\$550 M Golf Empire May Be in the Weeds: Experts](http://www.cnbc.com/2015/07/23/trumps-550m-golf-empire-may-be-in-the-weeds-experts.html), *cnbc.com*, July 23, 2015, available at <http://www.cnbc.com/2015/07/23/trumps-550m-golf-empire-may-be-in-the-weeds-experts.html>; see also [Donald Trump's Financial Disclosure Report Values Golf Courses at a Minimum of \\$500 Million](http://www.golfdigest.com/story/donald-trumps-financial-disclo), *Golf Digest*, July 24, 2015, available at <http://www.golfdigest.com/story/donald-trumps-financial-disclo> (same).

<sup>14</sup> Mullaney, *cnbc.com*, Jul. 23, 2015.

CNBC, in 2013, according to the Society of Golf Appraisers, “[n]o golf course in America sold for as much as \$50 million[.]”<sup>15</sup> In 2015, CNL Lifestyle Properties sold a portfolio of 48 golf courses, which had generated revenues of \$158 million in 2013, for \$320 million.<sup>16</sup> Two months later another company paid \$265 million for a portfolio of 50 golf courses that had generated annual revenues of around \$100 million.<sup>17</sup>

### Violations

Under a provision of the Ethics in Government Act, 5 U.S.C. App. § 101(c), every candidate for the office of President must file with the FEC a report containing information prescribed by 5 U.S.C. App. § 102 within 30 days of becoming a candidate, and thereafter by May 15 of the successive years in which the individual remains a candidate. Section 102 requires a “full and complete statement” of specified categories of assets, income, gifts, and liabilities for the candidate, the candidate’s spouse, and each dependent child, using certain dollar figure categories ranging from a minimum of not more than \$1,000 to a maximum of greater than \$50 million for certain types of assets. 5 U.S.C. App. §§ 102(a)-(d).

It is unlawful to either fail to file the required disclosures or knowingly and willfully file any false information that section 102 requires. 5 U.S.C. App. § 104(a). Section 104 authorizes the attorney general to bring a civil action for penalties, not to exceed \$50,000, for a knowing and willful falsification of the required information. Further, as the implementing regulation, 5 C.F.R. § 2634.701(c) notes, “[a]n individual may be prosecuted under criminal statutes for supplying false information on any financial disclosure report.”

The applicable criminal statute, 18 U.S.C. § 1001(a), makes it a criminal offense to “knowingly and willfully . . . make[] or use[] any false writing or document knowing the same to contain any materially false, fictitious, or fraudulent statement or entry.” Violations are subject to fines or imprisonment of not more than five years. *Id.* The purpose of this provision is “to protect the authorized functions of government departments and agencies from the perversion which might result from” material false representations. *United States v. Gilliland*, 312 U.S. 86, 93-94 (1941). Consistent with these requirements, the financial disclosure form requires the following certification from the filer: “I certify that the statements I have made in this report are true, complete and correct to the best of my knowledge.”

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<sup>15</sup> *Id.*

<sup>16</sup> Patrick Clark, *In Defense of Donald Trump*, *Bloomberg.com*, July 28, 2015, available at <http://www.bloomberg.com/news/articles/2015-07-28/in-defense-of-donald-trump-as-a-golf-course-owner->.

<sup>17</sup> *Id.* Based on the information publicly available, it is difficult to determine whether the valuation differences may be due to company assessed real estate values or a valuation of the businesses as ongoing concerns. DOJ, with subpoena power, is in a position to demand the documentation necessary to determine whether or not Mr. Trump made false representations regarding the value of the golf courses.

The Office of Government Ethics has issued detailed instructions for completing the required financial disclosure forms. The OGE explains,

it is important that you carefully complete the attached form. This report is a safeguard for you as well as the Government, in that it provides a mechanism for determining actual or potential conflicts between our public responsibilities and your private interests and activities and allows you . . . to fashion appropriate protections against such conflicts when they first appear.

Instructions for Completing OGE Form 278, Scope of Disclosure, at 1.

Those instructions also lay out eight acceptable methods for determining fair market value. As relevant here they include: (1) a good faith estimate “if the exact value is unknown or not easily obtainable”; (2) “value based upon a recent appraisal of the property interest”; (3) the purchase price; or (4) the assessed tax value “adjusted to reflect current market value if the tax assessment is computed at less than 100% of current value.” *Id.*, Definition of Terms, Value.

The OGE instructions also warn all filers:

Knowing and willful falsification of information, or failure to report information required by section 102 of the Act, may subject you to a civil monetary penalty . . . or other appropriate authority under section 104 of the Act. Knowing and willful falsification of information required to be filed by section 102 of the Act may also subject you to criminal prosecution.

*Id.*, Privacy Act Statement.

*Mr. Trump Appears to Have Made Material False Statements*

Applying any of the valuation methods OGE has prescribed, based on public information, it appears that Mr. Trump’s financial disclosure forms significantly overstate the value of his golf courses and, in at least some cases the revenues they have generated. First, even if their value is “unknown or not easily obtainable,” *id.*, a valuation that is tens of millions of dollars in excess of the tax-appraised value cannot reasonably be construed as “a good faith estimate.” *Id.* In any event, Mr. Trump cannot claim credibly the value of his courses cannot easily be ascertained, as demonstrated by an examination of comparable courses. For example, while Mr. Trump has claimed his Bedminster course is worth more

than \$50 million – a figure “about twice its tax-assessment value of \$27.8 million” – another course 14 miles away was on the market in 2015 for \$2.5 million.<sup>18</sup>

Second, there is no indication that any of Mr. Trump’s golf courses have been appraised at more than \$50 million. Indeed, if such appraisals had been made, they likely would have surfaced during Mr. Trump’s battles with state tax assessors. Third, Mr. Trump’s valuations do not square with the purchase prices of his courses. For example, Mr. Trump reportedly paid \$13 million for Trump National-Washington, D.C.,<sup>19</sup> well below the more than \$50 million value listed on his financial disclosure forms.

Finally, had Mr. Trump used the assessed tax value he would have reported golf course holdings valued at significantly less than the more than \$550 million he has claimed. As outlined above, in many states Mr. Trump has argued with state officials, insisting the tax value of his courses is a mere fraction of their assessed value, and certainly well below \$50 million. In Palm Beach, for example, he has argued his golf course is “worth no more than \$5 million” for tax purposes,<sup>20</sup> while assigning a value of over \$50 million on his 2015 and 2016 financial disclosure forms. This pattern is repeated with most of his courses. A review by the *Washington Post* of his golf course holdings revealed eight of 10 courses Mr. Trump owns in the United States have actual assessed values that are “far lower” than what he claimed in his financial disclosure forms.<sup>21</sup>

#### *Mr. Trump Appears to Have Knowingly and Willfully Made False Statements*

In two separate filings, Mr. Trump appears to have repeatedly and significantly overstated the values of his golf courses and, in some instances, the revenues they produced, despite a plethora of news articles pointing out how far afield his valuations are. Given Mr. Trump’s claims of exceptional business prowess and savvy, he certainly cannot claim ignorance.

In a similar vein, as the *Washington Post* has reported, Mr. Trump appears to have vastly misrepresented the amounts he has given to charity; of the 4,844 donations (totaling \$102 million) he claims to have made, none, it seems, were made with his own money.<sup>22</sup>

That Mr. Trump may play fast and loose with the truth in the political arena and uses every available loophole to avoid paying his fair share of taxes, all in an apparent effort to project an image of a far more successful businessman than he may really be, does not give him a license to deliberately overstate the value of his golf courses in forms submitted to the federal government in which accuracy is legally required. Allowing Mr. Trump to so flagrantly flout the requirements of 5 U.S.C. App. § 101(c) would undermine the process

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<sup>18</sup> Mullaney, *cnn.com*, Jul. 23, 2015.

<sup>19</sup> *Id.*

<sup>20</sup> Harwell, *Washington Post*, Aug. 21, 2016.

<sup>21</sup> *Id.*

<sup>22</sup> *Id.*

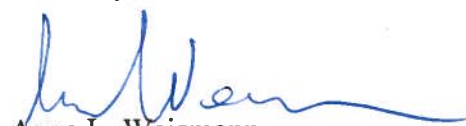
Raymond Hulser  
August 30, 2016  
Page 7

Congress put in place to “to protect the authorized functions of governmental departments and agencies[.]” *United States v. Gilliland*, 312 U.S. at 93-94. Nor can his conduct be excused or ignored as “no harm, no foul” because he overstated, rather than understated, the value of his golf portfolio. Nowhere does the Ethics in Government Act, its implementing regulations, or OGE guidance even suggest, much less permit, false statements of any kind.

### **Conclusion**

For the foregoing reasons, CfA respectfully requests that you commence an investigation of Donald Trump for apparent violations of 18 U.S.C. § 1001 and § 104 of the Ethics in Government Act, 5 U.S.C. App. § 104. We understand the sensitivity of undertaking such an investigation in the middle of a presidential campaign, but the integrity of the financial disclosure system and the interests it serves are at risk if Mr. Trump is not held accountable for his actions.

Sincerely,



Anne L. Weismann  
Executive Director



[Sent](#)**Natalie McGarry**

0141 763 2285

Ignore

Add to Contacts

To: [Donald J. Trump](#), >[Hide](#)From: [Natalie MCGARRY](#) >**Re: Record-breaking**

22 June 2016 17:50

Dear Donald J. Trump Jr.

Quite why you think it appropriate to write emails to UK parliamentarians with a begging bowl for your father's repugnant campaign is completely beyond me.

Given his rhetoric on migrants, refugees and immigration, it seems quite extraordinary that he would be asking foreign nationals for money; especially people who view his dangerous divisiveness with horror.

The U.S. elections are a matter for the American people, but I do send my warm hope that they reject your father fundamentally at the ballot box, not just to protect and improve the cohesion in society, to stop his corrosive othering of immigrants and for the protection of hard fought women's rights in the U.S. but also, selfishly, for world security, and international relations. The thought of his reactionary type of politics and apparent ignorance of world affairs having access to a seat at the world table is both surreal, and terrifying.

The above is a long way to say No, and do not contact me again.

Sincerely

Natalie McGarry

Member of Parliament for Glasgow East

[1148-1152 Shettleston Road, Glasgow, G32 7PQ](#)

[Sent](#)**Natalie McGarry**

0141 763 2285

Ignore

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To: [Donald J. Trump](#), >[Hide](#)From: [Natalie MCGARRY](#) >**Re: Record-breaking**

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Sincerely

Natalie McGarry

Member of Parliament for Glasgow East

[1148-1152 Shettleston Road, Glasgow, G32 7PQ](#)

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**Ticket: # 657438 - Incriminating attack on Ben Carson**

**Date:** 11/16/2015 12:14:11 AM

**City/State/Zip:** Palm Coast, Florida 32164

**Company Complaining About:** AT&T

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## **Description**

CNN vicious attacks on Ben Carson caused severe consequences- it became national issue among media & public even after Paris tragedy. CNN,FOX,OAN,MSNBC constantly every day still talking about his past life, people on Twitter call him liar, making fun & insulting him, racism also present. Media let Donald Trump openly insult Carson, things he said are discussing such as- " pathological liar, weak, mentally insane, comparing him to child molester, calling him criminal, boring, not trusting neurosurgeon, made fun of him in Texas, call him loser". Media said nothing. CNN went out to Carson hometown to investigate his past by talking to his friends, calling his schools/ are they FBI?! Who gave them permission to invade privacy?! Why they didn't investigate Trump?! They damaged Carson reputation & let Trump open his big dirty mouth even more! What they did is a crime- defamation of character & harassment. CNN pathetic actions left me no trust or respect for them. They must apologize to Carson ASAP. Please take immediate actions to take care of this problem & make justice for Carson. Those reporters should be fired. Thank you & I hope you will do the right thing

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**Ticket: # 877214 - 3 hr daily overt political ad**

**Date:** 3/24/2016 9:49:33 PM

**City/State/Zip:** Portland, Oregon 97229

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## **Description**

The Mark Levin show is broadcast over Freedom 970 AM in Portland Oregon. Mark Levin, since December 14, has used his show as a daily 3 hour crude slanderous attack advertisement against Donald Trump, and for Ted Cruz. Levin has used obscene and threatening terms. Today, March 24, 2016 @ 6:15 EDT, Levin threaten to step on the face of Trump's campaign manager. He show is almost a continuous onslaught of slander, rage, obscenity and false claims. How is it possible that this could be considered fair and equitable use of our airwaves. It has gone on for weeks. Other terms he has used "Cult of Personality" and "Assholes" against all Trump supporters. Today at 6:15 EDT, Levin called Eric Trump a liar, without Eric being able to respond to such outrageous broadcast slander.

I have emailed and contacted his social media accounts to be fair but it is getting much worse. Extremely inflammatory hate filled, now violence inciting stuff.

His social media is filled with complaints. Today he read some of the infamed complaints about him and mocked them viciously, inflaming even greater tensions.

I have listened to his show for at least 10 years, he has never acted so unstable and acutely enraged at his audience for not following his commands. Very ugly ugly stuff. Like a Hitler, Castro messianic derangement.

Given Mark Levin's extremely inflammatory language and unstable thoughts, including violence, it seems only appropriate that he be banned from the airwaves until after the election, this November. The public should not have their precious radio frequency used in such a hate filled hate inflaming manner.

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**Ticket: # 850683 - Unwanted email-no unsubscribe option**

**Date:** 3/7/2016 10:54:49 AM

**City/State/Zip:** Dix Hills, New York 11746

**Company Complaining About:** Baermarkets.com

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## **Description**

I am receiving unwanted mail concerning presidential campaign.

I blocked who seemed to be the husband associated with bear markets. Then I received the same type of proper hands from his wife. To which I responded, take my email off your database. Her email was also associated with Barr markets.

Yesterday I received continued emails from same "organization" called "President Porno ".

Please help stop these people from continuing their emails. There is a whole group of them. If I block one another person keeps it up.

This is found at bottom of their email.

And there is no unsubscribe button.

This message originates from

MADAME: Mothers and Daughters Against Misogynistic Exploitation

Chicago, IL 60602

914-294-5078

The emails originally came from these email addresses:

StevenBaer@baermarkets.com

BaerMarkets.comhide@aol.com

Thank you,

(b) (6)

I wish I can post an attachment but I am unable with my cell phone. Please find the email I most recently received.

-----Original Message-----

From: Megyn and Donna <donnamegyn@baermarkets.com>

To: undisclosed-recipients;

Sent: Sun, Mar 6, 2016 1:03 pm

Subject: Trump's Lechery

**FORWARD EVERYWHERE -- TIME IS RUNNING OUT**

**TO:** Every American Woman, plus a Few Good Men

**FR:** Meg, Donna and American Sisters

**RE:** Donald Trump's Lechery

Do we really want:

A Head of State who talks about his penis on TV, to the whole Planet?

A strip-clubber, vice lord and pornographer rising to world power?

A Commander-in-Chief who's a woman-degrading misogynist?

America's first Full-Frontal Naked First Lady? (who's NOT his first, and likely not his last).

America's First Daughter, example to our daughters, who publicly exposes herself too?

A National Example to our sons, fathers, brothers, husbands and boyfriends who reportedly said of women, "You have to treat 'em like shit."

A pathological liar, cheater, adulterous and deeply immoral, unstable man with his finger on the USA's nuclear arsenal?

A leech, a perv and a pig in the White House?

A "President Porno"?

We're assembling the lengthening indictment against Trump for his misogyny and lechery.

We are women from across the political, cultural, religious and socio-economic spectrum.

To learn the XXX-rated Truth about Trump, start here:

[www.stronghappyfamily.org](http://www.stronghappyfamily.org), which links you to

[www.presidentporno.com](http://www.presidentporno.com), which links you to

Trump's female-hating remarks,

Trump's disgusting record of infidelity, flagrant lying, bad character and sleaze.

Trump's Taj Mahal porno palace with public nudity, fondling, sexuality, cunnilingus and sado-masochism.

Trump's public talk about his penis, his sexual exploits, young girls and menstrual bleeding.

Quotes from some of us:

"Chris Christie's endorsement of Donald Trump is an astonishing display of political opportunism. Donald Trump is unfit to be President. He is a dishonest demagogue who plays to our worst fears. Trump would take America on a dangerous journey. Christie knows all that and indicated as much many times publicly. The Governor is mistaken if he believes he can now count on my support, and I call on Christie's donors and supporters to reject the Governor and Donald Trump outright. I believe they will. For some of us, principle and country still matter."

Meg Whitman

CEO, Hewlett Packard Enterprise

Chairman, Hewlett-Packard

Former CEO, eBay

"[W]e want you... to know all about Donald Trump's disgusting involvement in pornography, infidelity, vice... the degrading exploitation of girls and women.... marital cheating and misogyny.' "

Donna Baer

Author, Strong Happy Family: Unexpected Advice from an Ivy League Mom of Ten,

who has launched over 50 million messages to voters, pastors and rabbis since South Carolina

Trump "is a one-man wrecking crew of all political comportment, and a carrier of that virus....his brain appears to be a grab bag of impulses... he doesn't seem to know anything about public policy or the way the White House or the government actually works."

Peggy Noonan,  
The Wall Street Journal

Trump calls "women... 'fat pigs,' 'dogs,' 'slobs,' and 'disgusting animals.'... it was well beyond Rosie O'Donnell... [his] Twitter account has several disparaging comments about women's looks. [He] once told a contestant on 'Celebrity Apprentice' it would be a pretty picture to see her on her knees....Does that sound to you like the temperament of a man we should elect as president...?"

Megyn Kelly  
Fox News

"If it's Trump's goal to make everyone but his most blind, loyal supporters loathe him, he's doing a great job tonight. #NeverTrump....Make no mistake. Trump will treat you the way he treats Marco if you don't, let's say, get on your knees."

Amanda Carpenter

CNN Contributor

[After the March 3 debate, in which Trump alluded to his penis]

"WINNER: #NeverTrump, Loser: Trump sycophants.

Jennifer Rubin

The Washington Post

[After the March 3 debate, in which Trump alluded to his penis]

"Trump seems to have a Napoleon Complex or 'Little Man Syndrome' concerning his penis. He said in the Detroit debate to Megyn, her co-hosts and a global audience, 'I have to say this, I have to say this. He [Marco Rubio] hit my hands. Nobody has ever hit my hands. I have never heard of this. Look at those hands. Are they small hands? And he referred to my hands, if they are small, something else must be small. I guarantee you there is no problem. I guarantee.' Trump is lying. He has heard of this, it's obviously an obsession of his. To talk about his penis on national TV, he must be tremendously rattled by Rubio, by the Vanity Fair stuff, by the painting of him as a little guy, etc. Trump's as fixated on his wiener as poor Huma's husband, Anthony Wiener."

Name Withheld

for fear of personal retribution

"I am no Donald Trump fan. I did not vote for him in the Virginia primary....While many people call the Donald a fraud, a con-man, there are a lot of voters out there who think they have been conned election after election. They know what it is to be promised something and delivered nothing.... If we want to defeat Donald Trump, we cannot turn to the establishment once again and ask them to guide the citizenry to the right answer. If we want to defeat Donald Trump, we must defeat him at the ballot box."

Carly Fiorina

2016 GOP Presidential Candidate

Former CEO, Hewlett Packard

"It is hard for me to watch [Sarah Palin] endorse Donald Trump after what Donald Trump said about my father's service. Just on a personal level, it's hard for me to differentiate personal and politics in a situation like this." [NOTE: "He's not a war hero," Trump said, referring to McCain's 5½ years at the infamous North Vietnamese prison known as the "Hanoi Hilton." Trump: "He was a war hero because he was captured. I like people who weren't captured." Trump later clarified that he believed McCain to be a war hero, denying he had said that he was not]...What a cynical hack Mr. 'straight shooter' Chris Christie turned out to be. I hope he sleeps well tonight selling out what's left of himself....  
#NeverTrump #NeverTrump #NeverTrump #NeverTrump."

Meghan McCain

Commentator

Tweeting or retweeting @#Never Trump

"Read his own words again. Dating implies a sexual relationship. [S]tick with the guy who'd bang his own daughter...this is what YOUR joke of a candidate thinks is acceptable ....Him saying he'd date his daughter if he could disgusted me, so we're even #NeverTrump....So embarrassing that we're the joke of the world right now."

Tara Dublin

The Huffington Post

Tweeting or retweeting @#Never Trump

"To date, approximately 3.37 million Americans have cast a Trump vote. Yet an average 60 million people vote Republican in general elections, and overall 126 million people cast a presidential vote in 2012. He's certainly not unifying the broader country. According to a recent Gallup poll, nearly 60% of Americans view him u



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**Ticket: # 1096057 - NBC coverage of Republican Convention**

**Date:** 7/21/2016 10:23:05 AM

**City/State/Zip:** Apache Junction, Arizona 85120

**Company Complaining About:** AT&T

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## **Description**

I was disappointed and angered by comments made by Chuck Todd and Lester Holt specifically although Tom Brokaw seemed to be disparaging too. I did not appreciate Mr. Holt interrupting Newt Gingrich's speech to talk about Ted Cruz's speech. He seemed to relish the embarrassment of Trump. I wanted to listen to Gingrich's speech from a supposedly impartial news media. The group described Pence's speech as mediocre, did not discuss what he said but again talked about Cruz. Chuck Todd criticized what took place after Pence's speech and declared "this convention is a mess. Their partiality was obvious and Un warranted!!

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**Ticket: # 1345745 - Attempted Text Message Fraud**

**Date:** 12/9/2016 1:34:46 AM

**City/State/Zip:** Mechanicstown, Ohio 44651

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**Description**

A person claiming to be Ivanka Trump messaged my husband on Facebook. S/he asked for his cell phone number. He gave it to her/him. She then messaged him asking him for his bank account. The number from which the message came is (323) 456-3264.

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**Ticket: # 1216111 - Robocalls**

**Date:** 9/23/2016 2:41:32 PM

**City/State/Zip:** N. Chesterfield, Virginia 23235

**Company Complaining About:** The Donald Trump Campaign

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## **Description**

I have received multiple robocalls from Ivanka Trump on behalf of the Trump Campaign. In the phone call, there is no explanation for opting out. I called the number provided in the message, but could not speak to a live person to request to be removed from their call list. The only option given in the message when I called the number was to enter my cell number to receive even more info from the campaign. I visited the website and again could not find a way to opt out. I have now wasted time and made a long distance call and still can not seem to find a way to opt out of these calls.

---

**Ticket: # 1218659 - Constant harassment asking for money**

**Date:** 9/25/2016 6:38:27 PM

**City/State/Zip:** Endicott, New York 13760

**Company Complaining About:** Time Warner

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### **Description**

I constantly get harassed by Eric Trump obviously someone posing as him asking for donations. I asked them to stop further contact and even unsubscribed but I keep receiving about 4-5 emails a day or more asking for money. I don't know what else to do it doesn't go to my junk folder just my inbox. It's also costing me my data on my phone as well for alerts I need help. The email address that keeps emailing me is [contact@email.donaldtrump.com](mailto:contact@email.donaldtrump.com) Thank you

---

**Ticket: # 1221968 - Comcast email botted to subscribe to Trump & GOP mailing**

**Date:** 9/27/2016 1:29:52 PM

**City/State/Zip:** Gaithersburg, Maryland 20878-1807

**Company Complaining About:** Comcast

---

## **Description**

I received an email today "Getting closer: " from "contact@firedupconservative.com" with the Donald Trump, Jr. tag asking me to contribute to his campaign.

Since I am a "registered" Independent and have never registered as a Republican I was surprised. So I scrolled to the bottom to get to the law required 'unsubscribe' link and clicked on it.

At the unsubscribe site it asked for email address (which was (b) (6) ) which I entered. However, I rarely if ever use this email for much of anything. It comes with the Xfinity service.

However, I saw a link that stated "How was I added". So I clicked on it just to see.

It indicated that I had "opted in on Sept 23, 2016".

That was a lie.

Then as I am typing this another came in to yet a different email address, (b) (6) . This is used some, but is still older and the email I submit above is the preferred one I use.

Since I did not authorize either of these mailings, nor did I enroll in any Trump or Conservative site I find I have only one conclusion.

Either they are using hacked into server emails or they are using an email bot, a data gatherer that has gotten access to a potential huge list of email addresses.

It is also possible that they are now using emails hacked from the Democratic party recent hack. I do get emails from them, but that was the result of my viewing a client's request to see what he had created in 2006 or so. The only common spot is the (b) (6) as that was my primary email back in 2006.

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[Ticket: # 1223166 - Unwanted political robocalls to cell phone](#)

**Date:** 9/27/2016 8:45:27 PM

**City/State/Zip:** Brooklyn, New York 11233

**Company Complaining About:** Donald Trump Presidential Campaign

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## **Description**

On more than five separate occasions I have received unwanted political robocalls to my cell phone. All the calls were placed by the Donald Trump campaign. The calls are all recordings made by Ivanka Trump and Tana Goertz, and the recorded message states, "Paid for by the Donald J Trump presidential campaign." No automated menu option is available to opt out of these calls and nor is it possible to talk to a human being and ask to opt out. Attempts to call back the numbers the campaign calls from only result in replaying the same recorded message. These frequent robocalls to my cell phone are annoying, intrusive, and — as I understand it — illegal.

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**Ticket: # 1235020 - Voting poll**

**Date:** 10/4/2016 9:23:09 PM

**City/State/Zip:** Las Vegas, Nevada 89143

**Company Complaining About:** New York

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**Description**

Ivanka Trump (right) calling to tell me to vote for her husband.

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[Ticket: # 1251119 - Insulting Ivanka Trump phone messages](#)

**Date:** 10/10/2016 3:43:04 PM

**City/State/Zip:** Centerville, Ohio 45440

**Company Complaining About:** Donald Trump

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### **Description**

Unwanted calls from (317) 664-5148 and (614) 347-0112 with recorded Ivanka Trump message on behalf of her father.



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[Ticket: # 1301593 - Host suggested political assassination](#)

**Date:** 11/4/2016 12:03:18 AM

**City/State/Zip:** Los Angeles, California 90027

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### **Description**

In an interview with Eric Trump, KHOW host Ross Kaminsky said that U.S. Senate candidate David Duke is "a guy that desperately needs a bullet in the head". Audio of Kaminsky saying that can be found on Youtube and sites like New York Magazine, The Blaze, and Mediaite have covered Kaminsky's remarks.

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[Ticket: # 1297986 - Political Robocall from Trump Campaign](#)

**Date:** 11/2/2016 8:06:48 AM

**City/State/Zip:** Pinckney, Michigan 48169

**Company Complaining About:** Trump For Potus

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### **Description**

On 10/31/2016 at about 11:00 AM I received a recorded message from Ivanka Trump asking me to vote for her father

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**Ticket: # 1338223 - Persecuted American - Still having Issues in TV**

**Date:** 12/3/2016 1:56:36 PM

**City/State/Zip:** Montrose, California 91021

**Company Complaining About:** Directv

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## **Description**

Saturday, December 03, 2016

To whom It may concern,

The other day, Thursday morning, I called over to LAPD (Los Angeles police department) internal affairs and FBI Los Angeles about Jill Stein and her recount efforts and my case.

Mark Stein and Jill are from Highland park and were a part of my sex trafficking case that started with the Wassermanns and Oprah Winfrey as a political cause back in the late 80's at Second City.

The set up several legal cases through their lawyers and in order to keep me in court on false charges, out of a job and out of money. They continued to hide the crime by going to the FBI and law enforcement tracking me through my computer and GPS as if I were a fugitive.

Diane Sawyer went to Murry Weismann and they did offer me a small hair and makeup job but trafficked me to producers the whole time. They bombarded me and set up "traps", that would leave me without money to hide their crimes. They arranged my marriage and paid former supervisor Mike Antonovich and had closed door meetings with LA city council while Deborah Wasserman Schultz was the DNC.

Because it was done through the CIA and my family started it for their reasons, they all became rich while I became homeless. Their motive was money, power and respect. I was disrespected, raped, drugged and stalked.

The other day while calling about the money that Jill Stein received and the payments of millions by the Wasserman/ media machine, I the deal for the Olympics that was set up with Mayor Eric Garcetti, and Bob Iger to the LAPD internal affairs.

They then turned around and sent Bob Iger to Donald Trump to make sure that money and deal went through that following week.

I turned on the TV to watch the morning news and saw that the FBI and the LAPD had been in touch with Trump, setting up a call with Garcetti and Iger. KTLA was the station that I turned on (Wednesday or Thursday) and the producers had been joking on-air with Sam Rubin who was at ABC at the time of the beginning of my trafficking, joking about aging Germans that were out of work and laughing.

That was directed at me since my ex-brother in law works for KTLA and many of those producers and staff worked with him when he was the head of cable Vision and AVHQ. They have gone to several police chiefs, posted online for housing and jobs only or me to found out though mobbing and harassment afterwards, that it was one of their traps.

Rubi stated on-air that it was ok to keep people out of work on-air, especially "bad-tempered Germans, was the quote. As I stated, their motives were racial, and I was profiled by those Jews, targeted for life and they sent Oprah as a parody to the Salon that Mark Stein owned to commit acts of hate upon me. They expanded it through law enforcement later and have been laughing about the hate crime and how I just must take it. Oprah is also involved because my great grandfather in the 1800's was involved in the civil war movement against slavery. They make a mockery of my life and are continuing with their plans to make me homeless, with a felony criminal record so they can jail me. They gave the people who assaulted me various business deals in return for harming me.

They may decide to kill me but so far they have raped, stalked beaten mobbed, jailed and made me homeless. They have also stalked my child. It is time for the FBI to apologize for their actions and for me to be able to put the perpetrators in jail. I should be getting compensation from Jill Stein, Mark Stein, Oprah Winfrey, the Department of Justice as well as the Wassermans for Civil Rights violations. Instead they continue to persecute me and laugh about me being a bad-tempered German 'Patsy' that must have eradicated as if I were a small country.

It is time to fire all of them and get them out of the entertainment industry and stop Jewish persecution of others. Let's see how funny it is when they are out of jobs and in jail?

Once again, these people took Nazi programming MK Ultra/ Monarch programming and put their Nazi ideology from Germany through these media moguls as Hitler did for political gain.

If media is used by law enforcement to catch people that have broken the law, and are a true threat to society, then it can be a useful tool. In my case, they use my heritage to do continually inflict harm upon me. I am not a threat. I never have been and I never will be. They need to be fired, go to jail and pay me back for my pain and suffering. Tell them that no one respects them and take their money away. This all started in Chicago and has traveled to Tennessee when my family moved there along with Oprah's father. Eric Trump's foundation is in Memphis TN. It would be nice to have a life of my own without the media mafia bothering me.

(b) (6)

[REDACTED]

[REDACTED]

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**Ticket: # 1298063 - My Cell Phone, Android Device, Has Been Hacked By Democrats**

**Date:** 11/2/2016 9:47:43 AM

**City/State/Zip:** Deerfield Beach, Florida 33442

**Company Complaining About:** Verizon Wireless

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## **Description**

Up until about 2 weeks ago, I was receiving political email messages on my cell phone from Donald Trump, Donald Trump, Jr., Eric Trump, RNC and the RNC chairman, Priebus. Since then and now when I want to donate, the messages come through, but the text is all blocked. It is a political motive, as all of my other messages come through okay.

I understand on the nightly news the Google Chairman made a deal with the Clintons to help them with advanced cell phone technology to promote the democratic cause. I think my email cell phone problem is a result of this devious and illegal effort.

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**Ticket: # 583569 - Hate Speech/Possible Violation of Equal Air Time and Campaign Laws**

**Date:** 10/11/2015 12:57:16 PM

**City/State/Zip:** Vallejo, California 94590

**Company Complaining About:** Cbs

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**Description**

Dear FCC, I feel that CBS radio is spreading hate speech and discrimination against minorities and refugees by providing the xenophobic Donald Trump many minutes of air time to spread his hate while not providing equal time to people with differing views to counter the hatred. Said time seems to constitute an illegal promotion/commercial of a rich, hate-filled candidate without providing a counter voice. Such hatred is rampant in our society and we see hate groups spreading their infectious ideas with the help of the corporate media. Additionally, many minutes were provided for Ben Carson to promote his seditious speech against the government. Lastly, the station promoted a right wing congressman's (did not get his name) call for further right wing propaganda without providing equal air time to the other side or people who do not hate the government. In light of all the mass shootings and hatred of government, I see that absolute need to counter such propaganda in our "marketplace of ideas" as described by fmr. Supreme Court Justice Oliver W. Holmes. If our democratic republic is in peril (I do not believe this), then why are things going much better than under George W. Bush? I see this as a possible violation of campaign laws, spreading hate speech/xenophobia, and an irrational hatred of government by those elected to govern. Please look into this matter and at least make CBS provide equal air time to (rational) voices to counter the ignorance we had to hear this morning. Thank you for your time.

May 3, 2018

The Honorable Rod J. Rosenstein  
Deputy Attorney General  
U.S. Department of Justice  
950 Pennsylvania Ave., N.W.  
Washington, D.C. 20530-0001

Robert Khuzami  
Deputy United States Attorney  
United States Attorney's Office for the Southern District of New York  
1 St. Andrew's Plaza  
New York City, N.Y. 10007

David J. Apol  
Acting Director  
U.S. Office of Government Ethics, Suite 500  
1201 New York Ave., N.W.  
Washington, D.C. 20005

Re: Disclosure of Liabilities and Assets on President Donald J. Trump's Public Financial Disclosure Report

Dear Deputy Attorney General Rosenstein, Deputy United States Attorney Khuzami, and Acting Director Apol,

This letter supplements Citizens for Responsibility and Ethics in Washington's ("CREW") March 8, 2018 letter requesting that the Department of Justice ("DOJ") and the Office of Government Ethics ("OGE") investigate and determine whether a surreptitious payment made to a third party shortly before the 2016 presidential election by President Donald J. Trump's personal attorney Michael Cohen constituted a loan to President Trump that he should have reported as a liability on his public financial disclosure ("OGE 278") report,<sup>1</sup> and if President Trump knowingly and willfully failed to report it.<sup>2</sup>

Additional facts have come to light that provide substantial evidence to support a finding that the transaction constituted a liability that President Trump was required to report on his

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<sup>1</sup> See Donald J. Trump, Public Financial Disclosure Report, June 14, 2017 ("Trump OGE 278e"), available at <https://oge.app.box.com/s/kz4qvbdbsbcfrzq16msuo4zmth6rerh1c>.

<sup>2</sup> Letter to Deputy Attorney General Rod J. Rosenstein and Acting OGE Director David J. Apol, Mar. 8, 2018 (attached as Exhibit A). In an earlier letter, dated March 2, 2018, CREW requested that OGE exercise its oversight responsibilities to determine whether President Trump held a beneficial interest in Essential Consultants LLC, the entity through which the payment was made, that should have been reported as an asset on the OGE 278 report he filed in June 2017. Letter to Acting OGE Director David J. Apol, Mar. 2, 2018, available at <https://s3.amazonaws.com/storage.citizensforethics.org/wp-content/uploads/2018/03/02181742/OGE-letter-Essential-Consultants-3-2-18.pdf>.

The Honorable Rod Rosenstein  
Acting Director David Apol  
May 3, 2018  
Page 2

OGE 278 report, and that he may have knowingly failed to do so in violation of 18 U.S.C. § 1001 and the Ethics in Government Act of 1978 (“EIGA”).<sup>3</sup>

In an interview given by President Trump’s personal attorney Rudolph W. Giuliani last night,<sup>4</sup> Mr. Giuliani admitted that President Trump reimbursed Mr. Cohen for a \$130,000 payment he made to Stephanie Clifford (whose stage name is Stormy Daniels). According to Mr. Giuliani, the payment to Ms. Clifford was “funneled” through Mr. Cohen with “money . . . paid by his lawyer” and the “president reimbursed” him over a “period of several months.”<sup>5</sup> While “he didn’t know about the specifics of it,” Mr. Giuliani acknowledged that President Trump “did know about the general arrangement.”<sup>6</sup>

In a follow up interview with the *New York Times*, Mr. Giuliani provided additional details about the loan repayment, including that President Trump reimbursed Mr. Cohen at a rate of \$35,000 a month for a total amount of \$460,000 to \$470,000:

“Some time after the campaign is over, *they set up a reimbursement, \$35,000 a month*, out of his personal family account,” Mr. Giuliani said. He added that over all, *Mr. Cohen was paid \$460,000 or \$470,000 from Mr. Trump through those payments*, which also included money for “incidental expenses” that he had incurred on Mr. Trump’s behalf.<sup>7</sup>

Additional information about the loan is disclosed in a transcript released by the *Washington Post*, in which Mr. Giuliani revealed that the repayments plus expenses took place over a period of time in 2017, beginning in January of last year:

**Giuliani:** The original payment from Cohen was sometime right before the election. The repayments took place over a period of time, probably in 2017, probably all paid back by the end of 2017.

...

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<sup>3</sup> 5 U.S.C. app. § 102(a)(4).

<sup>4</sup> See [What Giuliani Said About Cohen’s Payment to Stormy Daniels](https://www.nytimes.com/2018/05/02/us/politics/rudy-giuliani-stormy-daniels-transcript.html), *New York Times*, May 2, 2018, available at <https://www.nytimes.com/2018/05/02/us/politics/rudy-giuliani-stormy-daniels-transcript.html>; Samuel Chamberlain and Paulina Dedaj, [Giuliani says Trump paid \\$130G to Cohen for ‘expenses’ over several months](http://www.foxnews.com/politics/2018/05/03/giuliani-says-trump-repaid-130g-to-cohen-over-several-months.html), *Fox News*, May 3, 2018, available at <http://www.foxnews.com/politics/2018/05/03/giuliani-says-trump-repaid-130g-to-cohen-over-several-months.html>.

<sup>5</sup> *Id.*

<sup>6</sup> *Id.*

<sup>7</sup> Michael D. Shear and Maggie Haberman, [Giuliani Says Trump Repaid Cohen for Stormy Daniels Hush Money](https://www.nytimes.com/2018/05/02/us/politics/trump-michael-cohen-stormy-daniels-giuliani.html), *New York Times*, May 2, 2018, (emphasis added), available at <https://www.nytimes.com/2018/05/02/us/politics/trump-michael-cohen-stormy-daniels-giuliani.html>.



**Giuliani:** . . . He trusted Michael and Michael trusted him. Michael knew when he laid out the \$135,000 he'd get it back and the president was always going to make sure he got it back — and enough money to pay the taxes.

. . .

**Costa:** How many payments did it take for the president to settle up with Cohen?

**Giuliani:** Do the arithmetic, right? \$35,000 a month, probably starting in January or February. By the time you get to \$250,000, it's all paid off. Remember, he also paid for the taxes. Then there probably were other things of a personal nature that Michael took care of, for which the president would have always trusted him as his lawyer, as my clients do with me. And that was paid back out of the rest of the money. And Michael earned a fee out of it.

. . .

**Costa:** Did the Cohen raid make the president believe this would all come out because the information on the payments was in the files?

**Giuliani:** He was more focused on how shocked he was that they broke into his lawyer's office. I don't think he even knows what kind of records there are of this payment. He didn't focus on the records. He focused on the fact that he owed Michael money; he trusted Michael implicitly. There was no reason not to. Michael would just take back the amount of money he was owed.<sup>8</sup>

Mr. Giuliani also provided details about President Trump's knowledge of the loan transaction, in which he admitted that President Trump was "aware that Michael incurred expenses to help him" and of an "arrangement so that Michael knew he'd be reimbursed for it."<sup>9</sup>

This newly reported information supports finding that Mr. Cohen made a loan to President Trump for which Mr. Cohen expected to be reimbursed after making a \$130,000 payment on behalf of President Trump to Ms. Clifford as part of a nondisclosure agreement. If it was a loan, President Trump likely violated federal law by failing to disclose it as a liability on his OGE 278 report, filed in June 2017 and covering liabilities incurred in 2016 like this \$130,000 payment.

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<sup>8</sup> Robert Costa, *Transcript: Giuliani interview with The Washington Post*, *Washington Post*, May 3, 2018, available at [https://www.washingtonpost.com/politics/transcript-giuliani-interview-with-the-washington-post/2018/05/03/a35c4a3c-4e9b-11e8-af46-b1d6dc0d9bfe\\_story.html?utm\\_term=.c755a119d6b2](https://www.washingtonpost.com/politics/transcript-giuliani-interview-with-the-washington-post/2018/05/03/a35c4a3c-4e9b-11e8-af46-b1d6dc0d9bfe_story.html?utm_term=.c755a119d6b2).

<sup>9</sup> *Id.*

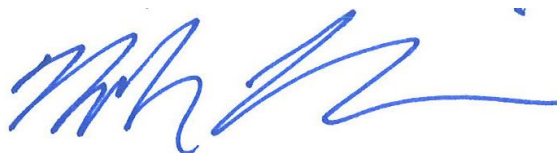
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Acting Director David Apol  
May 3, 2018  
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To maintain public confidence in the integrity of the federal government, EIGA requires public filers such as President Trump to report the “identity and category of value of the total liabilities owed to any creditor . . . which exceed \$10,000 at any time during the preceding calendar year.”<sup>10</sup> The implementing regulations further require that each financial disclosure report “identify and include a brief description of the filer’s liabilities over \$10,000 owed to any creditor at any time during the reporting period, and the name of the creditors to whom such liabilities are owed.”<sup>11</sup>

Failure to properly disclose information required to be reported on the OGE 278 can result in civil penalties and criminal prosecution. EIGA provides for civil penalties of up to \$50,000, and imprisonment of up to one year for knowingly and willfully failing to report required information.<sup>12</sup> Federal law further prohibits anyone from knowingly and willfully making “any materially false, fictitious, or fraudulent statement or representation” in any matter within the jurisdiction of the executive, legislative, or judicial branch, with violations punishable by up to five years in prison.<sup>13</sup>

In light of the emerging evidence, it is even more imperative that you investigate these allegations.

Sincerely,



Noah Bookbinder  
Executive Director



Ambassador (Ret.) Norman L. Eisen  
Chair

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<sup>10</sup> 5 U.S.C. app. § 102(a)(4).

<sup>11</sup> 5 C.F.R. § 2634.305.

<sup>12</sup> 5 U.S.C. app. § 104(a)(1)-(2).

<sup>13</sup> 18 U.S.C. § 1001(a)(2).

# **EXHIBIT A**

March 8, 2018

The Honorable Rod J. Rosenstein  
Deputy Attorney General  
U.S. Department of Justice  
950 Pennsylvania Ave., N.W.  
Washington, D.C. 20530-0001

David J. Apol  
Acting Director  
U.S. Office of Government Ethics, Suite 500  
1201 New York Ave., N.W.  
Washington, D.C. 20005

Re: Disclosure of Liabilities and Assets on President Donald J. Trump's Public Financial Disclosure Report

Dear Deputy Attorney General Rosenstein and Acting Director Apol,

Citizens for Responsibility and Ethics in Washington ("CREW") respectfully requests that the Department of Justice ("DOJ") and the Office of Government Ethics ("OGE") investigate and determine whether a surreptitious payment made to a third party shortly before the 2016 presidential election by President Donald J. Trump's personal attorney or a limited liability company ("LLC") the attorney created constituted a loan to President Trump that he should have reported as a liability on his public financial disclosure ("OGE 278") report,<sup>1</sup> and if President Trump knowingly and willfully failed to report it.

On March 2, 2018, CREW requested that OGE exercise its oversight responsibilities to determine whether President Trump held a beneficial interest in the LLC, Essential Consultants LLC, that should have been reported as an asset on the OGE 278 report he filed in June 2017.<sup>2</sup> The full facts and circumstances about the payment and the LLC remain unknown, and CREW reasserts its request for a review of President Trump's interest in it. Newly reported information, however, now also suggests that President Trump's personal attorney Michael Cohen or Essential Consultants LLC made a loan to President Trump for which Mr. Cohen expected to be reimbursed after making a \$130,000 payment on behalf of President Trump to a third party as part of a nondisclosure agreement.<sup>3</sup> If it was a loan, President Trump seemingly violated federal law by failing to disclose it as a liability on his OGE 278.

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<sup>1</sup> See Donald J. Trump, Public Financial Disclosure Report, June 14, 2017 ("Trump OGE 278e"), available at <https://oge.app.box.com/s/kz4qvbdshbcfrzq16msuo4zmth6rerh1c>.

<sup>2</sup> Letter to Acting OGE Director David J. Apol from CREW Executive Director Noah Bookbinder, Mar. 2, 2018 (attached as Exhibit A). CREW also sent the letter to DOJ and requested OGE refer the omission to DOJ if appropriate.

<sup>3</sup> Joe Palazzolo and Michael Rothfeld, Trump Lawyer's Payment to Stormy Daniels Was Reported as Suspicious by Bank, *Wall Street Journal*, Mar. 5, 2018, available at <https://www.wsj.com/articles/trump-lawyers-payment-to-porn-star-was-reported-as-suspicious-by-bank-1520273701?tesla=y&mod=e2tw>.

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Acting Director David Apol  
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In light of the emerging evidence, we are sending this request for investigation to you. We trust to your discretion as to the appropriate officials in your respective agencies to look into this matter. In making that determination, the Department of Justice may wish to consider that Special Counsel Robert Mueller may be investigating a similar pattern of potential blackmail based on personal matters involving Mr. Trump, and also that Ms. Clifford may have evidence germane to establishing such a pattern.

### **Background**

On October 27, 2016, less than two weeks before the election, Essential Consultants LLC, a company Mr. Cohen had just created, made a \$130,000 wire transfer to Stephanie Clifford, an adult film actress whose stage name is Stormy Daniels.<sup>4</sup> Ms. Clifford reportedly was owed the payment “in return for signing an agreement that bars her from discussing an alleged sexual encounter with President Trump.”<sup>5</sup> In February 2018, Mr. Cohen characterized the matter as a “private transaction” in which he used his “own personal funds to facilitate” the payment to Ms. Clifford, and said that “neither the Trump organization nor the Trump campaign” was a “party to the transaction” and “neither reimbursed me for the payment, either directly or indirectly.”<sup>6</sup>

Newly reported information suggests President Trump was aware of the payment and that Mr. Cohen expected President Trump to reimburse him for it. According to the *Wall Street Journal*, Mr. Cohen told a friend “he missed two deadlines earlier that month to make the \$130,000 payment to Ms. Clifford because he couldn’t reach Mr. Trump in the hectic final days of the presidential campaign.”<sup>7</sup> Furthermore, the *Wall Street Journal* reported that “after Mr. Trump’s victory, Mr. Cohen complained to friends that he had yet to be reimbursed for the payment to Ms. Clifford.”<sup>8</sup>

On March 6, 2018, Ms. Clifford filed a lawsuit against President Trump and Essential Consultants LLC in which she outlined the affair she had with President Trump and the nondisclosure agreement that she was to enter into with President Trump and Essential Consultants LLC.<sup>9</sup> In the lawsuit, Ms. Clifford alleges that President Trump “*at all times* has

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<sup>4</sup> Joe Palazzolo and Michael Rothfeld, Trump Lawyer Used Private Company, Pseudonyms to Pay Porn Star ‘Stormy Daniels’, *Wall Street Journal*, Jan. 18, 2018, available at <https://www.wsj.com/articles/trump-lawyer-used-private-company-pseudonyms-to-pay-porn-star-stormy-daniels-1516315731>; Maggie Haberman, Michael D. Cohen, Trump’s Longtime Lawyer, Says He Paid Stormy Daniels Out of His Own Pocket, *New York Times*, Feb. 13, 2018, available at <https://www.nytimes.com/2018/02/13/us/politics/stormy-daniels-michael-cohen-trump.html>.

<sup>5</sup> Palazzolo and Rothfeld, *Wall Street Journal*, Mar. 5, 2018.

<sup>6</sup> Haberman, *New York Times*, Feb. 13, 2018; Tarini Parti, Full statement from Trump Lawyer Michael Cohen on his payment to Stormy Daniels, *BuzzFeed*, Feb. 13, 2018, available at <https://twitter.com/tparti/status/963624434140614656>.

<sup>7</sup> Palazzolo and Rothfeld, *Wall Street Journal*, Mar. 5, 2018.

<sup>8</sup> *Id.*

<sup>9</sup> *Stephanie Clifford a.k.a. Stormy Daniels a.k.a. Peggy Peterson v. Donald J. Trump a.k.a. David Dennison, Essential Consultants LLC, and Does 1 through 10*, Complaint, Case No. BC696568, Superior Court of California, County of Los Angeles, filed Mar. 6, 2018, (“Clifford Complaint”), available at <https://www.documentcloud.org/>

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Acting Director David Apol  
March 8, 2018  
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been fully aware of the negotiations with Ms. Clifford, the existence and terms of the Hush Agreement, the payment of \$130,000, [and] the use of [Essential Consultants LLC] as a conduit.”<sup>10</sup>

President Trump filed his OGE 278 report with OGE on June 14, 2017, which apparently covers the reporting period January 2016 through April 15, 2017.<sup>11</sup> In signing the OGE 278, President Trump certified that the statements he “made in this report are true, complete and correct to the best of my knowledge.”<sup>12</sup> However, President Trump did not report any liability owed to either Mr. Cohen or to Essential Consultants LLC on part 8 (the liability section) of his OGE 278.<sup>13</sup>

After President Trump signed the report, he filed his OGE 278 report with OGE for “certification.”<sup>14</sup> Then-OGE Director Walter M. Shaub Jr. certified the report on June 16, 2017, stating that “[o]n the basis of information contained in this report,” he “conclude[d] that the filer is in compliance with applicable laws and regulations.”<sup>15</sup>

### **Potential Violations**

To maintain public confidence in the integrity of the federal government, the Ethics in Government Act of 1978 (“EIGA”) requires public filers such as President Trump to report the “identity and category of value of the total liabilities owed to any creditor . . . which exceed \$10,000 at any time during the preceding calendar year.”<sup>16</sup> The implementing regulations require that each financial disclosure report “identify and include a brief description of the filer’s liabilities over \$10,000 owed to any creditor at any time during the reporting period, and the name of the creditors to whom such liabilities are owed.”<sup>17</sup> Public filers similarly must report assets they hold that exceed \$1,000 and income received in excess of \$200.<sup>18</sup>

Failure to properly disclose information required to be reported on the OGE 278 can result in civil penalties and criminal prosecution. EIGA provides for civil penalties of up to \$50,000, and imprisonment of up to one year for knowingly and willfully failing to report required information.<sup>19</sup> Federal law further prohibits anyone from knowingly and willfully

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[documents/4403879-Filed-Complaint.html#document/p1](#); Rebecca R. Ruiz and Matt Stevens, Stormy Daniels Sues, Saying Trump Never Signed ‘Hush Agreement’, *New York Times*, Mar. 6, 2018, available at <https://www.nytimes.com/2018/03/06/us/stormy-daniels-trump-lawsuit.html>.

<sup>10</sup> Clifford Complaint, ¶ 32.

<sup>11</sup> Trump OGE 278e; Jill Disis and Cristina Alesci, Trump reports hundreds of millions in income, *CNN*, June 16, 2017, available at <http://money.cnn.com/2017/06/16/news/trump-financial-disclosure-form/index.html>.

<sup>12</sup> Trump OGE 278e.

<sup>13</sup> *Id.*

<sup>14</sup> *Id.*

<sup>15</sup> *Id.*

<sup>16</sup> 5 U.S.C. app. § 102(a)(4).

<sup>17</sup> 5 C.F.R. § 2634.305.

<sup>18</sup> 5 U.S.C. app. § 102(a)(1) and (3).

<sup>19</sup> 5 U.S.C. app. § 104(a)(1)-(2).

making “any materially false, fictitious, or fraudulent statement or representation” in any matter within the jurisdiction of the executive, legislative, or judicial branch, with violations punishable by up to five years in prison.<sup>20</sup>

The statements that the *Wall Street Journal* reported were made by Mr. Cohen to “friends” shortly after the election, if true, strongly suggest a loan arrangement between Mr. Cohen and President Trump. Taken together with the Mr. Cohen’s earlier statements, the new information indicates that Mr. Cohen twice delayed making the payment to Ms. Clifford in order to obtain clearance from his client President Trump, and that after Mr. Cohen obtained clearance he acted to “facilitate” payment using his own money with the expectation he would be reimbursed by President Trump sometime after the election. As a result, the \$130,000 payment appears to be a liability that President Trump owed to Mr. Cohen or Essential Consultants LLC that should have been reported on President Trump’s OGE 278.<sup>21</sup>

The statements the *Wall Street Journal* reported and Ms. Clifford’s lawsuit also suggest that Mr. Cohen likely notified President Trump about the loan arrangement before he made the payment. Mr. Cohen is subject to the New York Rules of Professional Conduct, which require him to keep his client President Trump fully informed of all material developments in a matter, including settlements, and to reasonably consult with his client about the means by which the client’s objective are to be accomplished.<sup>22</sup> To be in compliance with his professional obligations, Mr. Cohen should have notified President Trump about the settlement and payment arrangement, and presumably did so. Ms. Clifford’s lawsuit also alleges President Trump was fully aware of the negotiations, settlement, and \$130,000 payment to her, further suggesting he was aware of the arrangement. If President Trump had knowledge of a loan arrangement but failed to report it on his OGE 278, he seemingly made a false statement when he certified that the OGE 278 was “complete and correct to the best of [his] knowledge.”

President Trump’s failure to report the liability also may have been done willfully to avoid embarrassing questions about the underlying basis of the loan – that is, that the payment was made to Ms. Clifford shortly before the election pursuant to a nondisclosure agreement in exchange for her silence about the purported affair. The parties involved in the transaction apparently took extreme measures to ensure that their identities would not be disclosed by using pseudonyms in the nondisclosure agreement and entering into a side agreement in which their true identities were disclosed.<sup>23</sup> These facts suggest President Trump’s failure to report the loan may have been done both knowingly and willfully.

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<sup>20</sup> 18 U.S.C. § 1001(a)(2).

<sup>21</sup> A complaint has been filed with Federal Election Commission alleging that the \$130,000 payment made in the weeks before the 2016 presidential election constituted an “in-kind contribution” that exceeded campaign contribution limits and was not properly reported. *Common Cause and Paul S. Ryan v. Donald J. Trump for President, Inc., The Trump Organization, and John Doe*, Complaint, MUR \_\_\_\_ (Jan. 22, 2018), available at <http://www.commoncause.org/policy-and-litigation/litigation/fec-complaint-trump-january-22-2018-no-cover.pdf>.

<sup>22</sup> New York Rules of Professional Conduct, Rule 1.4, Communication.

<sup>23</sup> Clifford Complaint, Exs. 1-2; Palazzolo and Rothfeld, *Wall Street Journal*, Jan. 18, 2018.

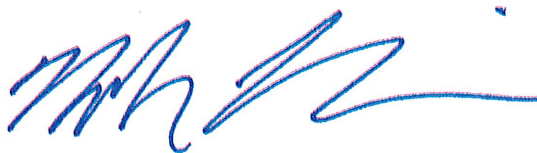
The Honorable Rod Rosenstein  
Acting Director David Apol  
March 8, 2018  
Page 5

Even with the recently reported information, the extent of President Trump's involvement in Essential Consultants LLC is not fully known. As set forth in CREW's March 2, 2018 letter, there is substantial evidence that President Trump held a beneficial interest in that entity and thus should have disclosed it as an asset on his OGE 278. CREW hereby incorporates the March 2, 2018 letter by reference and reasserts the request that DOJ and OGE conduct an investigation into President Trump's involvement in Essential Consultants LLC to determine whether it should have been reported and if President Trump violated EIGA and/or other federal laws.

### **Conclusion**

The purpose of the public financial disclosure reporting process is to ensure public confidence in the integrity of the federal government by demonstrating that high-level government officials are able to carry out their duties without compromising the public trust.<sup>24</sup> Recent news reports indicate President Trump may have violated federal law by failing to disclose the \$130,000 payment made by Mr. Cohen or Essential Consultants LLC to Ms. Clifford shortly before the 2016 presidential election as a liability on his OGE 278 report, and by failing to disclose Essential Consultants LLC as an asset due to his beneficial interest in the company. If President Trump failed to meet his public financial disclosure reporting requirements, he will have undermined the public trust that these laws are designed to protect. An investigation into this matter is important to safeguard that public trust.

Sincerely,



Noah Bookbinder  
Executive Director



Ambassador (Ret.) Norman L. Eisen  
Chair

Encl.

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<sup>24</sup> 5 C.F.R. § 2634.104.



**EXHIBIT A**

March 2, 2018

David J. Apol  
Acting Director  
Office of Government Ethics  
Suite 500  
1201 New York Ave., N.W.  
Washington, D.C. 20005

Re: Disclosure of Essential Consultants LLC on President Donald J. Trump's Public  
Financial Disclosure Report

Dear Acting Director Apol,

Citizens for Responsibility and Ethics in Washington ("CREW") respectfully requests that the Office of Government Ethics ("OGE") exercise its oversight responsibilities to determine whether President Donald J. Trump held a beneficial interest in a limited liability company ("LLC") that was used by his personal lawyer to make a surreptitious payment to a third party in the weeks before the 2016 presidential election. If he did, the LLC should have been reported as an "interest in property" on the public financial disclosure report ("OGE 278") President Trump filed with OGE in June 2017.<sup>1</sup>

President Trump's personal lawyer Michael D. Cohen recently issued a statement in which he acknowledged his personal involvement in a \$130,000 payment to adult film actress Stephanie Clifford, whose stage name is Stormy Daniels.<sup>2</sup> The payment reportedly was made using a bank account linked to Delaware limited liability company Essential Consultants LLC, which was created by Mr. Cohen in October 2016.<sup>3</sup>

Mr. Cohen characterized the payment as a "private transaction" in which he used his "own personal funds to facilitate" the payment to Ms. Clifford.<sup>4</sup> Mr. Cohen indicated that

<sup>1</sup> See Donald J. Trump, Public Financial Disclosure Report, June 14, 2017 ("Trump OGE 278e"), available at <https://oge.app.box.com/s/kz4qvbdsbcfrzq16msuo4zmth6rerh1c>.

<sup>2</sup> Maggie Haberman, Michael D. Cohen, Trump's Longtime Lawyer Says He Paid Stormy Daniels Out of his Own Pocket, *New York Times*, Feb. 13, 2018, available at <https://www.nytimes.com/2018/02/13/us/politics/stormy-daniels-michael-cohen-trump.html>.

<sup>3</sup> Joe Palazzolo and Michael Rothfeld, Trump Lawyer Used Private Company, Pseudonyms to Pay Porn Star 'Stormy Daniels', *Wall Street Journal*, Jan. 18, 2018, available at <https://www.wsj.com/articles/trump-lawyer-used-private-company-pseudonyms-to-pay-porn-star-stormy-daniels-1516315731>.

<sup>4</sup> Haberman, *New York Times*, Feb. 13, 2018; Tarini Parti, Full statement from Trump lawyer Michael Cohen on his payment to Stormy Daniels, *BuzzFeed*, Feb. 13, 2018, available at <https://twitter.com/tparti/status/963624434140614656>.

Acting Director David Apol  
March 2, 2018  
Page 2

“neither the Trump organization nor the Trump campaign” was a “party to the transaction” and “neither reimbursed me for the payment, either directly or indirectly.”<sup>5</sup> Notably, he did not rule out the use of President Trump’s funds to reimburse him or President Trump’s involvement in the matter, and concluded his statement by saying, “I will always protect Mr. Trump.”<sup>6</sup>

Mr. Cohen issued his statement in response to a complaint filed by Common Cause with the Federal Election Commission (“FEC”) alleging that the \$130,000 payment made in the weeks before the 2016 presidential election constituted an “in-kind contribution” that exceeded campaign contribution limits and was not properly reported.<sup>7</sup> The FEC complaint alleges that there is reason to believe that the Trump presidential campaign accepted the \$130,000 payment to Ms. Clifford as an in-kind contribution from the Trump Organization or “John Doe” as part of an agreement “by which Ms. Clifford would be precluded from publicly discussing alleged sexual encounters between her and Mr. Trump” that purportedly occurred in 2006.<sup>8</sup>

If, as Mr. Cohen contends, the payment does not constitute an “in-kind contribution,” the payment raises questions about whether President Trump has met his financial disclosure reporting obligations. As a public filer, President Trump is required by the Ethics in Government Act of 1978 to report the value of “any interest in property held during the preceding calendar year in a trade or business or for investment or the production of income, which has a fair market value which exceeds \$1,000 as of the close of the preceding calendar year.”<sup>9</sup> Failure to knowingly and willfully report information required to be reported may subject the filer to civil penalties not to exceed \$50,000 and possible criminal liability.<sup>10</sup>

Despite Mr. Cohen’s attempt to claim that only he was involved with Essential Consultants LLC and the payment to Ms. Clifford, the true facts about the transaction and the LLC’s ownership remain unknown. Some public information, however, indicates President Trump may have been involved. Mr. Cohen’s statement that he was “protect[ing] Mr. Trump” suggests that he was acting on behalf of President Trump when he made the payment to Ms. Clifford.<sup>11</sup> Mr. Cohen also did not actually say he used his personal funds to “make” the payment, but only to “facilitate” it, implying that a third party was involved. Mr. Cohen’s use of Essential Consultants LLC’s bank account to make the payment, which allowed greater secrecy, further raises the possibility that someone else may have held a beneficial interest in the LLC and put up the funds for the payment. By using a Delaware-based LLC to make the

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<sup>5</sup> *Id.*

<sup>6</sup> *Id.*

<sup>7</sup> *Common Cause and Paul S. Ryan v. Donald J. Trump for President, Inc., The Trump Organization, and John Doe*, Complaint, MUR \_\_\_\_ (Jan. 22, 2018), available at <http://www.commoncause.org/policy-and-litigation/litigation/fec-complaint-trump-january-22-2018-no-cover.pdf>.

<sup>8</sup> *Id.*, ¶ 12.

<sup>9</sup> 5 U.S.C. app. § 102(a)(3).

<sup>10</sup> 5 U.S.C. app. § 104(a).

<sup>11</sup> Parti, *BuzzFeed*, Feb. 13, 2018.

payment, which would shield the identity of its beneficial owners, Mr. Cohen may have acted to facilitate a distribution from the LLC that was attributable to someone else as a beneficial owner. While we don't know who else may have been a beneficial owner and contributed funds, President Trump, as the person who benefitted from the transaction, seems like a logical possibility. In addition, had Mr. Cohen in fact used \$130,000 of his own monies to pay Ms. Clifford in connection with this "private transaction," it would raise the same concerns about possible campaign finance violations that are the subject of the FEC complaint, and his denial of those violations raises the possibility that a different approach, which more directly involved the President, had been used.

President Trump is expected to be held to the highest standards of ethical conduct. Based on newly-reported information about the \$130,000 payment, it is incumbent upon OGE to determine whether President Trump included all reportable information on his OGE 278 report when he filed it in June 2017. It will be important to determine whether President Trump held a beneficial interest in Essential Consultants as of December 31, 2016, and if so whether the company held assets or made payments that should have been disclosed.

If under these circumstances President Trump held a beneficial interest in Essential Consultants LLC at the end of 2016, it should have been disclosed on his OGE 278 report based on the value of its assets, yet it was not.<sup>12</sup> The nondisclosure agreement alone is worth at least \$130,000, and possibly much more based on recent media interest. Very little is known about the other business activities of Essential Consultants LLC except that Mr. Cohen has used it for purposes of a consulting arrangement he entered into with "4C Health Solutions, a Midlothian, Va.-based company that focuses on detecting fraudulent health-care billings" and for which he serves on the board of directors.<sup>13</sup>

The Director of OGE is charged with monitoring and investigating compliance with public financial disclosure reporting obligations.<sup>14</sup> Since Essential Consultants LLC was the vehicle used by President Trump's personal lawyer to make the \$130,000 payment in the weeks before the election, and use of Mr. Cohen's own funds may be a violation of campaign finance law, it is incumbent upon OGE to make the necessary inquiries to determine whether President Trump held a beneficial interest in Essential Consultants LLC that would have required him to disclose it as an asset on his OGE 278 report. If so, President

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<sup>12</sup> Trump OGE 278e.

<sup>13</sup> Joe Palazzolo and Michael Rothfeld, Trump Lawyer Used Private Company, Pseudonyms to Pay Porn Star 'Stormy Daniels', *Wall Street Journal*, Jan. 18, 2018, available at <https://www.wsj.com/articles/trump-lawyer-used-private-company-pseudonyms-to-pay-porn-star-stormy-daniels-1516315731>.

<sup>14</sup> 5 U.S.C. app. § 402(b)(3).

Acting Director David Apol  
March 2, 2018  
Page 4

Trump should amend the report to reflect this omission and OGE should consider whether a referral to the Department of Justice would be appropriate.<sup>15</sup>

Sincerely,



Noah Bookbinder  
Executive Director



Ambassador (Ret.) Norman L. Eisen  
Chair



Richard Painter  
Vice Chair

cc: The Honorable Jeff Sessions  
Attorney General

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<sup>15</sup> See 5 U.S.C. app. § 104(a).

# United States Senate

WASHINGTON, DC 20510

November 17, 2016

President-elect Donald J. Trump  
Trump-Pence Transition Team  
1717 Pennsylvania Ave NW  
Washington, DC 20006

Dear President-elect Trump:

Your campaign conduct and Electoral College victory have unleashed a wave of verbal and physical assaults against our fellow Americans. In just the last six days, the Southern Poverty Law Center has documented hundreds of acts of discrimination and violence toward many of the ethnic and social groups you attacked in your campaign. These attacks are absolutely unacceptable. We condemn them. We stand united with our fellow Americans.

Unfortunately, these acts of hate have been enabled by your campaign strategy of promoting bigotry, racism, and sexism. It is the logical consequence of your campaign attacks on and discrimination aimed at Hispanics, African Americans, veterans, immigrants, women, Muslims, Jews, and individuals with disabilities. Millions of Americans see a President-elect who has chosen to knock them down rather than to lift them up. Your conduct has empowered too many Americans to act on their darkest impulses.

This is the wrong vision for America and the wrong path for your coming Administration. We call on you to change course. We urge you, as our future President, to join us in rejecting hate and embracing respect for every ethnicity, race and gender. We urge you to join us in fighting for a nation free of discrimination, where every child has the opportunity to thrive and to contribute according to his or her ability. We urge you to join us in fighting for our Constitutional vision of equality and opportunity and the vision in our Pledge of Allegiance of liberty and justice for all.

As you assume the mantle of leadership in office, it is your responsibility to put an end to the crimes of hate and prejudice sweeping our nation. These wounds to our national citizenry are of your making. It is your responsibility to rectify the damage. You have the power as President to move beyond the hate-filled rhetoric of your campaign.

We call on you to repudiate your campaign attacks against diverse communities of Americans.

We call on you to address the American people and demand that all Americans end their verbal and physical attacks and replace acts of hatred with acts of kindness.

We call on you to exclude the proponents of discrimination and hatred from the ranks of your Administration, and that includes immediately firing Steve Bannon as your Chief Strategist.



THE CITY OF NEW YORK  
OFFICE OF THE MAYOR  
NEW YORK, N.Y. 10007

December 5, 2016

The Honorable Barack H. Obama  
The White House  
Washington, D.C. 20500

Re: Reimbursement for Security Expenditures

Dear Mr. President:

New York City is requesting federal reimbursement for funds expended to protect President-elect Donald Trump and his family over the 75 days between Election Day 2016 and Inauguration Day 2017.

Mr. Trump's residence and functional transition headquarters is located within Trump Tower, a 58-story mixed-use skyscraper located on Fifth Avenue between 56th and 57th Streets in midtown Manhattan, New York City. Mr. Trump has publicly stated that Trump Tower will be his primary residence during the transition period, and that his wife and child will continue to reside there until the 2016-17 school year concludes. He indicates that he may return on weekends throughout the course of his term.

Following Mr. Trump's election win, the New York City Police Department ("NYPD") promptly implemented a comprehensive 24-hour security protocol. Officers and tactical teams were deployed to security posts and screening checkpoints. The City posted Civilian Traffic Enforcement Agents to manage traffic disrupted by security operations and an increased pedestrian flow. The NYPD also provides motorcade protection to the President-elect and his family when they travel through the City.

Locating a residence within New York City that requires ongoing Presidential-level security presents unprecedented law enforcement concerns. Trump Tower is located in the heart of a prime commercial area in Manhattan, adjacent to high profile hotels, multi-use buildings, and department stores, is near highly trafficked sidewalks, subways, and bus stops, and is also close to iconic tourist attractions including Central Park and the Museum of Modern Art. It is a high-density neighborhood and street traffic easily obstructs pathways to and from the building, making it profoundly challenging for the NYPD to establish a secure perimeter. While the United States Secret Service provides an unparalleled level of personal security to the President-elect and his family, the NYPD is responsible not only for their safety, but for the security of



# SPOKANE POLICE DIVISION

## JAMES A. MCDEVITT

May 17, 2016

Bernie 2016  
P.O. Box 905  
Burlington, VT 05402

Bernie Sanders Campaign Office  
2209 N. Monroe St.  
Spokane, WA 99205

Hillary for America  
P.O. Box 5256  
New York, NY 10185-5256

Donald J. Trump for President, Inc.  
725 5<sup>th</sup> Avenue  
New York, NY 10022

To Whom It May Concern,

The undersigned is the Director of Law Enforcement for the City of Spokane. In that capacity, thank you all for your recent campaign visit to Spokane, the City of Choice. We welcome your trip to our city and your acknowledgement that we are an important hub for the Inland Empire.

With respect to your recent visit, you must know that such campaign stops necessitate an increased law enforcement presence, both for public safety and candidate safety as well. In a mid-size city such as Spokane, with a law enforcement cadre that is already deluged with normal day to day law enforcement duties, the overtime costs associated with short notice events, such as campaign visits, cause our overtime budget to skyrocket.

In that regard, find enclosed our Spokane Police Department statement for Dignitary Services. Enclosed with this letter, each of you will find the statement which corresponds with the police services overtime for your specific event on the date(s) indicated.

I know that each of you can understand my responsibility to operate a department which is fiscally responsible and answerable to the citizens who pay our salaries. I know that each of you hold these public responsibilities in high regard.

Please remit the amount stated on your respective statement within 30 days of the date of this letter. Your remittance should be made payable to the City of Spokane. I certainly appreciate your willingness to uphold my fiscal responsibility to our citizens.

Should you have any questions, please don't hesitate to contact the undersigned. My direct dial is: 509-625-4243.

Thank you in advance.

Sincerely,

  
James A. McDevitt  
Director of Law Enforcement

cc: Spokesman Review  
Officer Teresa Fuller

Enclosures

Public Safety Building • 1100 W. Mallon Avenue • Spokane, Washington 99260-0001







RUN_ID	EMPLID	LAST_NAM	FIRST_NAM	MIDL	YEAR	DATE	PROGRAM	FUNCTION	TYPE	HOURS	EARNINGS	DIST_PCT	ERNCD	ERNCD_DESCR	ACTIVITY	ACTIVITY_DESCR
BW201607	11275	Teigen	Troy	D	2016	03/21/2016	11920	21250	51215	8.5	626.5351	100	27	Uniform Overtime	6509	DIGNITARY VISITS
BW201607	11606	Brownlee	Todd	W	2016	03/21/2016	11920	21250	51215	8.5	510.8917	100	27	Uniform Overtime	6509	DIGNITARY VISITS
BW201607	11710	Eriksen	Devin	D	2016	03/21/2016	11920	21250	9020	6.5	390.68	100	22	Police Call In-Minim	6509	DIGNITARY VISITS
BW201607	11710	Eriksen	Devin	D	2016	03/21/2016	11920	21250	51215	7.8127	7.8127	100	869	OT Premium Educat	6509	DIGNITARY VISITS
BW201607	11765	Vaughn	Kevin	L	2016	03/21/2016	11920	21250	51215	2.33	140.0447	100	27	Uniform Overtime	6509	DIGNITARY VISITS
BW201607	11765	Vaughn	Kevin	L	2016	03/21/2016	11920	21250	51215	1.4007	1.4007	100	868	OT Premium Educat	6509	DIGNITARY VISITS
BW201607	11956	Woodyard	Amy	K	2016	03/21/2016	11920	21250	51215	2.33	140.0447	100	27	Uniform Overtime	6509	DIGNITARY VISITS
BW201607	11956	Woodyard	Amy	K	2016	03/21/2016	11920	21250	51215	2.8006	2.8006	100	869	OT Premium Educat	6509	DIGNITARY VISITS
BW201607	12022	Voeller	Ronald	R	2016	03/21/2016	11920	21250	51215	7	420.7334	100	27	Uniform Overtime	6509	DIGNITARY VISITS
BW201607	12022	Voeller	Ronald	R	2016	03/21/2016	11920	21250	51215	8.4152	8.4152	100	869	OT Premium Educat	6509	DIGNITARY VISITS
BW201607	12287	Pegram	Shawn	M	2016	03/21/2016	11920	21250	9020	6	361.94	100	22	Police Call In-Minim	6509	DIGNITARY VISITS
BW201607	12287	Pegram	Shawn	M	2016	03/21/2016	11920	21250	51215	7.0745	7.0745	100	869	OT Premium Educat	6509	DIGNITARY VISITS
										41.16	2,618.37					
										Social Security	0.0145	37.97				
										POLL	0.0523	136.94				
										<b>TOTAL OT &amp; Benefits</b>		<b>2,793.28</b>				

# TeleStaff

Payroll Report

03/21/2016 through 03/21/2016

Period NOT Finalized

LIMITED BY

Detail: '6509'

	<i>Name</i>		<i>Hours</i>	<i>Code</i>	<i>Description</i>
11606	Brownlee, Todd W.	09020 (Dig/TAC)	8.50	027	w OT Specialty Teams Pay (STP)
11710	Eriksen, Devin D.	09020 (EDU)	6.50	022	w OT Specialty Teams Call In Pay
12287	Pegram, Shawn M.	09020 (EDU)	6.00	022	w OT Specialty Teams Call In Pay
11275	Teigen, Troy D.	09150 (Dig)	8.50	027	w OT Specialty Teams Pay (STP)
11765	Vaughn, Kevin L.	09020 (Dig/TAC)	2.33	027	w OT Specialty Teams Pay (STP)
12022	Voeller, Ronald R.	09020 (Dig)	7.00	027	w OT Specialty Teams Pay (STP)
11956	Woodyard, Amy K.	09110 (Dig/PIO)	2.33	027	w OT Specialty Teams Pay (STP)
			41.17	Hours	



# SPOKANE POLICE DIVISION

## DIRECTOR OF LAW ENFORCEMENT

JAMES A. MCDEVITT

**BILL TO:**  
Bernie Sanders Campaign

**DATE:** May 3, 2016

**INVOICE:** SP-2016-1039  
**DIGNITARY SERVICES**

EVENT DATE	OT HRS	OT RATE	AMOUNT
20-Mar-16	264.39		17,825.10
23-Mar-16	34.00		2,445.34
24-Mar-16	187.16		13,048.29
<b>Total of overtime for the month</b>			<b>33,318.73</b>
<b>Less Overtime CAP for the month</b>			
<b>TOTAL</b>		<b>\$</b>	<b>33,318.73</b>

Signature \_\_\_\_\_

Date \_\_\_\_\_

US Bank  
Routing #: 125000105  
Account #: 153595286060  
Tax ID: 91-6001280

Contact Name: Angie Chirowamangu  
Spokane Police Accountant  
(509) 625-4072 FAX: (509) 625-4066  
[achirowamangu@spokanecity.org](mailto:achirowamangu@spokanecity.org)

RUN_ID	EMPLID	LAST_NAM	FIRST_NAM	MIDI	YEAR	DATE	PROGRAM	FUNCTION	TYPE	HOURS	EARNINGS	DIST_PCT	ERNCD	ERNCD_DEACTIVITY	ACTIVITY_DESCR
BW201607	11784	Austin	Brent	D	2016	03/20/2016	11920	21250	51215	11.50	844.82	100	27	Uniform O	6509 DIGNITARY VISITS
BW201607	11784	Austin	Brent	D	2016	03/20/2016	11920	21250	51215	-	8.32	100	868	OT Premiu	6509 DIGNITARY VISITS
BW201607	16028	Belitz	Todd	S	2016	03/20/2016	11920	21250	51215	8.25	477.18	100	27	Uniform O	6509 DIGNITARY VISITS
BW201607	14672	Brasch	Christophe	P	2016	03/20/2016	11920	21250	51215	11.50	672.08	100	27	Uniform O	6509 DIGNITARY VISITS
BW201607	20897	Brown	Biel Benjamin	C	2016	03/20/2016	11920	21250	51215	8.25	446.99	100	27	Uniform O	6509 DIGNITARY VISITS
BW201607	20897	Brown	Biel Benjamin	C	2016	03/20/2016	11920	21250	51215	-	8.94	100	869	OT Premiu	6509 DIGNITARY VISITS
BW201607	21069	Brownell	Mark	R	2016	03/20/2016	11920	21250	51215	8.25	446.99	100	27	Uniform O	6509 DIGNITARY VISITS
BW201607	11606	Brownlee	Todd	W	2016	03/20/2016	11920	21250	51215	3.33	200.15	100	27	Uniform O	6509 DIGNITARY VISITS
BW201607	16853	Bryer	Toby	J	2016	03/20/2016	11920	21250	51215	8.25	467.78	100	27	Uniform O	6509 DIGNITARY VISITS
BW201607	21067	Childress	Aaron	M	2016	03/20/2016	11920	21250	51215	-	1.49	100	868	OT Premiu	6509 DIGNITARY VISITS
BW201607	15665	Chimienti	Samuel	L	2016	03/20/2016	11920	21250	51215	8.25	477.18	100	27	Uniform O	6509 DIGNITARY VISITS
BW201607	15665	Chimienti	Samuel	L	2016	03/20/2016	11920	21250	51215	-	9.54	100	869	OT Premiu	6509 DIGNITARY VISITS
BW201607	16711	Cedeno	Julian	G	2016	03/20/2016	11920	21250	51215	1.83	72.66	100	27	Uniform O	6509 DIGNITARY VISITS
BW201607	16711	Cedeno	Julian	G	2016	03/20/2016	11920	21250	51215	-	1.45	100	869	OT Premiu	6509 DIGNITARY VISITS
BW201607	11532	Cordis	Tyler	A	2016	03/20/2016	11920	21250	51215	8.25	608.11	100	27	Uniform O	6509 DIGNITARY VISITS
BW201607	11532	Cordis	Tyler	A	2016	03/20/2016	11920	21250	51215	-	12.16	100	869	OT Premiu	6509 DIGNITARY VISITS
BW201607	11605	Crane	Christophe	R	2016	03/20/2016	11920	21250	51215	3.00	217.03	100	27	Uniform O	6509 DIGNITARY VISITS
BW201607	11605	Crane	Christophe	R	2016	03/20/2016	11920	21250	51215	-	2.17	100	868	OT Premiu	6509 DIGNITARY VISITS
BW201607	14475	Dollard	Arthur	L	2016	03/20/2016	11920	21250	51215	11.50	665.16	100	27	Uniform O	6509 DIGNITARY VISITS
BW201607	16382	Dotson	Joseph	S	2016	03/20/2016	11920	21250	51215	5.58	322.75	100	27	Uniform O	6509 DIGNITARY VISITS
BW201607	16382	Dotson	Joseph	S	2016	03/20/2016	11920	21250	51215	-	3.23	100	868	OT Premiu	6509 DIGNITARY VISITS
BW201607	11953	Eckersley	Brian	G	2016	03/20/2016	11920	21250	51215	8.25	596.85	100	27	Uniform O	6509 DIGNITARY VISITS
BW201607	11953	Eckersley	Brian	G	2016	03/20/2016	11920	21250	51215	-	5.97	100	868	OT Premiu	6509 DIGNITARY VISITS
BW201607	11710	Eriksen	Devin	D	2016	03/20/2016	11920	21250	51215	5.83	350.41	100	27	Uniform O	6509 DIGNITARY VISITS
BW201607	11710	Eriksen	Devin	D	2016	03/20/2016	11920	21250	51215	-	7.01	100	869	OT Premiu	6509 DIGNITARY VISITS
BW201607	21258	Fisher	Tyler	J	2016	03/20/2016	11920	21250	51215	-	2.98	100	869	OT Premiu	6509 DIGNITARY VISITS
BW201607	21537	Gonsalves	Keith	H	2016	03/20/2016	11920	21250	51215	8.25	446.99	100	27	Uniform O	6509 DIGNITARY VISITS
BW201607	21537	Gonsalves	Keith	H	2016	03/20/2016	11920	21250	51215	-	8.94	100	869	OT Premiu	6509 DIGNITARY VISITS
BW201607	11281	Griffiths	Mark	D	2016	03/20/2016	11920	21250	51215	10.00	884.55	100	27	Uniform O	6509 DIGNITARY VISITS
BW201607	12078	Heuett	Kyle	D	2016	03/20/2016	11920	21250	51215	11.50	691.21	100	27	Uniform O	6509 DIGNITARY VISITS
BW201607	12078	Heuett	Kyle	D	2016	03/20/2016	11920	21250	51215	-	6.91	100	868	OT Premiu	6509 DIGNITARY VISITS
BW201607	14084	Kernkamp	Jay	E	2016	03/20/2016	11920	21250	51215	11.50	665.16	100	27	Uniform O	6509 DIGNITARY VISITS
BW201607	14084	Kernkamp	Jay	E	2016	03/20/2016	11920	21250	51215	-	13.30	100	869	OT Premiu	6509 DIGNITARY VISITS
BW201607	21468	Laiva	Joshua	P	2016	03/20/2016	11920	21250	51215	1.83	99.15	100	27	Uniform O	6509 DIGNITARY VISITS
BW201607	21254	Maplethor	Benjamin	D	2016	03/20/2016	11920	21250	51215	1.83	99.15	100	27	Uniform O	6509 DIGNITARY VISITS
BW201607	21254	Maplethor	Benjamin	D	2016	03/20/2016	11920	21250	51215	-	1.98	100	869	OT Premiu	6509 DIGNITARY VISITS
BW201607	12503	Nollmeyer	Trevor	W	2016	03/20/2016	11920	21250	51215	8.25	486.46	100	27	Uniform O	6509 DIGNITARY VISITS
BW201607	12503	Nollmeyer	Trevor	W	2016	03/20/2016	11920	21250	51215	-	9.73	100	869	OT Premiu	6509 DIGNITARY VISITS
BW201607	11611	O'Brien	John	J	2016	03/20/2016	11920	21250	51215	10.00	601.05	100	27	Uniform O	6509 DIGNITARY VISITS
BW201607	11611	O'Brien	John	J	2016	03/20/2016	11920	21250	51215	-	6.01	100	868	OT Premiu	6509 DIGNITARY VISITS
BW201607	11651	Palmer	Bruce	H	2016	03/20/2016	11920	21250	51215	10.00	641.85	100	27	Uniform O	6509 DIGNITARY VISITS
BW201607	11651	Palmer	Bruce	H	2016	03/20/2016	11920	21250	51215	-	12.84	100	869	OT Premiu	6509 DIGNITARY VISITS
BW201607	11339	Pavlischak	Charles	J	2016	03/20/2016	11920	21250	51215	1.83	113.14	100	27	Uniform O	6509 DIGNITARY VISITS



**TeleStaff**

Payroll Report

3/20/2016 through 3/20/2016

Period NOT Finalized

LIMITED BY

overtime,w OT Special Events Pay,w OT Specialty Teams Call In Pay,w OT  
Specialty Teams Pay,w OT Uniform Pay

Detail: '6509'

Work Code: w ot

	<i>Name</i>		<i>Hours</i>	<i>Code</i>	<i>Description</i>
11784	Austin, Brent D.	09150 (Meth/SWAT)	11.50	027	w OT Specialty Teams Pay (STP)
16028	Belitz, Todd S.	09020 (Dig/TAC)	8.25	027	w OT Specialty Teams Pay (STP)
14672	Brasch, Christopher P.	09020 (SWAT)	11.50	027	w OT Specialty Teams Pay (STP)
20897	Brown-Bieber, Benjamin C.	09010 (TAC)	8.25	027	w OT Specialty Teams Pay (STP)
21069	Brownell, Mark	09010 (TAC)	8.25	027	w OT Specialty Teams Pay (STP)
11606	Brownlee, Todd W.	09020 (Dig/TAC)	3.33	027	w OT Specialty Teams Pay (STP)
16853	Bryer, Toby J.	09020 (TAC)	8.25	027	w OT Specialty Teams Pay (STP)
16711	Cedeno, Julian	09010	1.83	027	w OT Uniform Pay (OTPu)
15665	Chimienti, Samuel L.	09020 (FTO/TAC)	8.25	027	w OT Specialty Teams Pay (STP)
11532	Cordis, Tyler A.	09150 (TAC)	8.25	027	w OT Specialty Teams Pay (STP)
11605	Crane, Christopher R.	09150	3.00	027	w OT Uniform Pay (OTPu)
14475	Dollard, Arthur L.	09020 (SWAT)	11.50	027	w OT Specialty Teams Pay (STP)
16382	Dotson, Joseph S.	09010 (TAC)	5.58	027	w OT Specialty Teams Pay (STP)
11953	Eckersley, Brian G.	09150 (TAC)	8.25	027	w OT Specialty Teams Pay (STP)
11710	Eriksen, Devin D.	09020 (EDU)	5.83	027	w OT Specialty Teams Pay (STP)
21537	Gonsalves, Keith H.	09010 (TAC)	8.25	027	w OT Specialty Teams Pay (STP)
11281	Griffiths, Mark D.	09160 (Dig)	10.00	027	w OT Specialty Teams Pay (STP)
12078	Heuett, Kyle D.	09020 (FTO/SWAT)	11.50	027	w OT Specialty Teams Pay (STP)
14084	Kernkamp, Jay	09020 (SWAT)	11.50	027	w OT Specialty Teams Pay (STP)
21468	Laiva, Joshua P.	09010 (PIO)	1.83	027	w OT Uniform Pay (OTPu)
21254	Maplethorpe, Benjamin D.	09010 (PIO/TAC)	1.83	027	w OT Uniform Pay (OTPu)
12503	Nollmeyer, Trevor	09020 (TAC)	8.25	027	w OT Specialty Teams Pay (STP)
11611	OBrien, John J.	09020 (Dig/H)	10.00	027	w OT Specialty Teams Pay (STP)
11651	Palmer, Bruce H.	09050 (Dig/TAC)	10.00	027	w OT Specialty Teams Pay (STP)
11339	Pavlishchak, Charles J.	09020 (SWAT)	1.83	027	w OT Uniform Pay (OTPu)
12287	Pegram, Shawn M.	09020 (EDU)	7.00	027	w OT Specialty Teams Pay (STP)
11478	Ponto, Traci R.	09020 (Dig)	10.00	027	w OT Specialty Teams Pay (STP)

**TeleStaff**

Payroll Report

3/20/2016 through 3/20/2016

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LIMITED BY

Work Code: w ot

overtime,w OT Special Events Pay,w OT Specialty Teams Call In Pay,w OT  
Specialty Teams Pay,w OT Uniform Pay

Detail: '6509'

	<i>Name</i>		<i>Hours</i>	<i>Code</i>	<i>Description</i>
15272	Quarles, Darrell Q.	09020 (FTO/TAC)	8.25	027	w OT Specialty Teams Pay (STP)
10712	Sprague, Dean E.	09160 (TAC)	4.00	027	w OT Specialty Teams Pay (STP)
11954	Storment, Zachary J.	09150 (MCU/SWAT)	11.50	027	w OT Specialty Teams Pay (STP)
11275	Teigen, Troy D.	09150 (Dig)	5.00	027	w OT Specialty Teams Pay (STP)
11765	Vaughn, Kevin L.	09020 (Dig/TAC)	6.00	027	w OT Specialty Teams Pay (STP)
12022	Voeller, Ronald R.	09020 (Dig)	3.33	027	w OT Specialty Teams Pay (STP)
15371	Wilkinson, Rhian	09020 (TAC)	8.25	027	w OT Specialty Teams Pay (STP)
11956	Woodyard, Amy K.	09110 (Dig/PIO)	6.00	027	w OT Specialty Teams Pay (STP)
20731	Yen, John W.	09010 (TAC)	8.25	027	w OT Specialty Teams Pay (STP)
			264.41	Hours	



RUN_ID	EMPLID	LAST_NAM	FIRST_NAM	MID_NAM	YEAR	DATE	PROGRAM	FUNCTION	TYPE	HOURS	EARNINGS	DIST_PCT	ERNCD	ERNCD_DESCR	ACTIVITY	ACTIVITY_DESCR	
BW201607	11275	Teigen	Troy	D	2016	03/23/2016	11920	21250	51215	15.00	1,105.65	100	27	Uniform Overtime	6509	DIGNITARY VISITS	
BW201607	11276	Anderson	Jon	D	2016	03/23/2016	11920	21250	51215	1.00	88.46	100	27	Uniform Overtime	6509	DIGNITARY VISITS	
BW201607	11765	Vaughn	Kevin	L	2016	03/23/2016	11920	21250	51215	9.00	540.95	100	27	Uniform Overtime	6509	DIGNITARY VISITS	
BW201607	11765	Vaughn	Kevin	L	2016	03/23/2016	11920	21250	51215	-	5.41	100	868	OT Premium Educatio	6509	DIGNITARY VISITS	
BW201607	11956	Woodyard	Amy	K	2016	03/23/2016	11920	21250	51215	9.00	540.95	100	27	Uniform Overtime	6509	DIGNITARY VISITS	
BW201607	11956	Woodyard	Amy	K	2016	03/23/2016	11920	21250	51215	-	10.82	100	869	OT Premium Educatio	6509	DIGNITARY VISITS	
										<b>34.00</b>	<b>2,292.22</b>						
										Social Security	0.0145	33.24					
										POLL	0.0523	119.88					
										<b>TOTAL OT &amp; Benefits</b>		<b>2,445.34</b>					

# TeleStaff

Payroll Report

03/23/2016 through 03/23/2016

Period NOT Finalized

LIMITED BY

Work Code: w ot

overtime,w OT Special Events Pay,w OT Specialty Teams Pay,w OT Uniform Pay

Detail: '6509'

	<i>Name</i>		<i>Hours Code</i>	<i>Description</i>
11276	Anderson, Jon D.	09160	1.00 027	w OT Specialty Teams Pay (STP)
11275	Teigen, Troy D.	09150 (Dig)	15.00 027	w OT Specialty Teams Pay (STP)
11765	Vaughn, Kevin L.	09020 (Dig/TAC)	9.00 027	w OT Specialty Teams Pay (STP)
11956	Woodyard, Amy K.	09110 (Dig/PIO)	9.00 027	w OT Specialty Teams Pay (STP)
			34.00 Hours	

RUN_ID	EMPLID	LAST_NAM	FIRST_NAM	MIL_YEAR	DATE	PROGRAM	FUNCTION	TYPE	HOURS	EARNINGS	DIST_PCT	ERNCD	ERNCD_DE	ACTIVITY	ACTIVITY_DESCR
BW201607	11276	Anderson	Jon	D	2016	03/24/2016	11920	21250	51215	10.75	950.89	100	27	Uniform O	6509 DIGNITARY VISITS
BW201607	11784	Austin	Brent	D	2016	03/24/2016	11920	21250	51215	2.00	146.93	100	27	Uniform O	6509 DIGNITARY VISITS
BW201607	11784	Austin	Brent	D	2016	03/24/2016	11920	21250	51215	-	1.45	100	868	OT Premiu	6509 DIGNITARY VISITS
BW201607	12501	Brannon	Beau	J	2016	03/24/2016	11920	21250	51215	6.75	398.01	100	27	Uniform O	6509 DIGNITARY VISITS
BW201607	14672	Brasch	Christophe	P	2016	03/24/2016	11920	21250	51215	6.00	350.65	100	27	Uniform O	6509 DIGNITARY VISITS
BW201607	20902	Briggs	Nicholas	C	2016	03/24/2016	11920	21250	51215	8.50	460.53	100	27	Uniform O	6509 DIGNITARY VISITS
BW201607	11606	Brownlee	Todd	W	2016	03/24/2016	11920	21250	51215	10.00	601.05	100	27	Uniform O	6509 DIGNITARY VISITS
BW201607	11709	Carpenter	Paul	D	2016	03/24/2016	11920	21250	51215	6.75	488.33	100	27	Uniform O	6509 DIGNITARY VISITS
BW201607	11709	Carpenter	Paul	D	2016	03/24/2016	11920	21250	51215	-	9.77	100	869	OT Premiu	6509 DIGNITARY VISITS
BW201607	16381	Conrath	Christophe	S	2016	03/24/2016	11920	21250	51215	8.50	491.64	100	27	Uniform O	6509 DIGNITARY VISITS
BW201607	16381	Conrath	Christophe	S	2016	03/24/2016	11920	21250	51215	-	9.83	100	869	OT Premiu	6509 DIGNITARY VISITS
BW201607	11532	Cordis	Tyler	A	2016	03/24/2016	11920	21250	51215	0.33	24.32	100	27	Uniform O	6509 DIGNITARY VISITS
BW201607	11532	Cordis	Tyler	A	2016	03/24/2016	11920	21250	51215	-	0.49	100	869	OT Premiu	6509 DIGNITARY VISITS
BW201607	11605	Crane	Christophe	R	2016	03/24/2016	11920	21250	51215	6.75	488.33	100	27	Uniform O	6509 DIGNITARY VISITS
BW201607	11605	Crane	Christophe	R	2016	03/24/2016	11920	21250	51215	-	4.88	100	868	OT Premiu	6509 DIGNITARY VISITS
BW201607	14475	Dollard	Arthur	L	2016	03/24/2016	11920	21250	51215	1.00	57.84	100	27	Uniform O	6509 DIGNITARY VISITS
BW201607	16382	Dotson	Joseph	S	2016	03/24/2016	11920	21250	51215	8.50	491.64	100	27	Uniform O	6509 DIGNITARY VISITS
BW201607	16382	Dotson	Joseph	S	2016	03/24/2016	11920	21250	51215	-	4.92	100	868	OT Premiu	6509 DIGNITARY VISITS
BW201607	14193	Green	Benjamin	T	2016	03/24/2016	11920	21250	51215	8.50	491.64	100	27	Uniform O	6509 DIGNITARY VISITS
BW201607	14193	Green	Benjamin	T	2016	03/24/2016	11920	21250	51215	-	9.83	100	869	OT Premiu	6509 DIGNITARY VISITS
BW201607	12078	Heuett	Kyle	D	2016	03/24/2016	11920	21250	51215	1.33	79.94	100	27	Uniform O	6509 DIGNITARY VISITS
BW201607	12078	Heuett	Kyle	D	2016	03/24/2016	11920	21250	51215	-	0.80	100	868	OT Premiu	6509 DIGNITARY VISITS
BW201607	14702	Johnson	Christophe	L	2016	03/24/2016	11920	21250	51215	6.75	395.69	100	27	Uniform O	6509 DIGNITARY VISITS
BW201607	14702	Johnson	Christophe	L	2016	03/24/2016	11920	21250	51215	-	7.81	100	869	OT Premiu	6509 DIGNITARY VISITS
BW201607	11539	Kakuda	Blaine	S	2016	03/24/2016	11920	21250	51215	8.50	555.90	100	27	Uniform O	6509 DIGNITARY VISITS
BW201607	11539	Kakuda	Blaine	S	2016	03/24/2016	11920	21250	51215	-	5.56	100	868	OT Premiu	6509 DIGNITARY VISITS
BW201607	14084	Kernkamp	Jay	E	2016	03/24/2016	11920	21250	51215	1.00	57.84	100	27	Uniform O	6509 DIGNITARY VISITS
BW201607	14084	Kernkamp	Jay	E	2016	03/24/2016	11920	21250	51215	-	1.16	100	869	OT Premiu	6509 DIGNITARY VISITS
BW201607	20926	Matt	Joseph	A	2016	03/24/2016	11920	21250	51215	8.50	460.53	100	27	Uniform O	6509 DIGNITARY VISITS
BW201607	20926	Matt	Joseph	A	2016	03/24/2016	11920	21250	51215	-	9.21	100	869	OT Premiu	6509 DIGNITARY VISITS
BW201607	11651	Palmer	Bruce	H	2016	03/24/2016	11920	21250	51215	1.00	64.19	100	27	Uniform O	6509 DIGNITARY VISITS
BW201607	11651	Palmer	Bruce	H	2016	03/24/2016	11920	21250	51215	-	1.28	100	869	OT Premiu	6509 DIGNITARY VISITS
BW201607	11478	Ponto	Traci	R	2016	03/24/2016	11920	21250	51215	1.00	61.23	100	27	Uniform O	6509 DIGNITARY VISITS
BW201607	11478	Ponto	Traci	R	2016	03/24/2016	11920	21250	51215	-	0.61	100	868	OT Premiu	6509 DIGNITARY VISITS
BW201607	11758	Reynolds	Charles	J	2016	03/24/2016	11920	21250	51215	8.50	614.93	100	27	Uniform O	6509 DIGNITARY VISITS
BW201607	11758	Reynolds	Charles	J	2016	03/24/2016	11920	21250	51215	-	12.30	100	869	OT Premiu	6509 DIGNITARY VISITS
BW201607	10712	Sprague	Dean	E	2016	03/24/2016	11920	21250	51215	8.50	779.66	100	27	Uniform O	6509 DIGNITARY VISITS
BW201607	11954	Stormont	Zachary	J	2016	03/24/2016	11920	21250	51215	1.00	72.34	100	27	Uniform O	6509 DIGNITARY VISITS
BW201607	11954	Stormont	Zachary	J	2016	03/24/2016	11920	21250	51215	-	0.72	100	868	OT Premiu	6509 DIGNITARY VISITS
BW201607	11275	Teigen	Troy	D	2016	03/24/2016	11920	21250	51215	10.00	737.10	100	27	Uniform O	6509 DIGNITARY VISITS
BW201607	11830	Uberuaga	Jason	S	2016	03/24/2016	11920	21250	51215	10.00	601.05	100	27	Uniform O	6509 DIGNITARY VISITS
BW201607	11830	Uberuaga	Jason	S	2016	03/24/2016	11920	21250	51215	-	12.02	100	869	OT Premiu	6509 DIGNITARY VISITS
BW201607	11765	Vaughn	Kevin	L	2016	03/24/2016	11920	21250	51215	10.00	601.05	100	27	Uniform O	6509 DIGNITARY VISITS

BW201607	11765	Vaughn	Kevin	L	2016	03/24/2016	11920	21250	51215	-	6.01	100	868	OT Premi	100	6509	DIGNITARY VISITS		
BW201607	12022	Voeller	Ronald	R	2016	03/24/2016	11920	21250	51215	10.00	601.05	100	27	Uniform O	100	6509	DIGNITARY VISITS		
BW201607	12022	Voeller	Ronald	R	2016	03/24/2016	11920	21250	51215	-	12.02	100	869	OT Premi	100	6509	DIGNITARY VISITS		
BW201607	21059	Wells	Dale	E	2016	03/24/2016	11920	21250	51215	6.75	365.72	100	27	Uniform O	100	6509	DIGNITARY VISITS		
BW201607	21059	Wells	Dale	E	2016	03/24/2016	11920	21250	51215	-	3.66	100	868	OT Premi	100	6509	DIGNITARY VISITS		
BW201607	11956	Woodyard	Amy	K	2016	03/24/2016	11920	21250	51215	10.00	601.05	100	27	Uniform O	100	6509	DIGNITARY VISITS		
BW201607	11956	Woodyard	Amy	K	2016	03/24/2016	11920	21250	51215	-	12.02	100	869	OT Premi	100	6509	DIGNITARY VISITS		
BW201607	21538	Zimmerma	Mark	R	2016	03/24/2016	11920	21250	51215	-	13.82	100	869	OT Premi	100	6509	DIGNITARY VISITS		
										187.16	12,231.24								
										Social Security		0.0145	177.35						
										POLL		0.0523	639.69						
										<b>TOTAL OT &amp; Benefits</b>		<b>13,048.29</b>							

**TeleStaff**

## Payroll Report

03/24/2016 through 03/24/2016

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Work Code: w ot

overtime,w OT Special Events Pay,w OT Specialty Teams Pay,w OT Uniform  
Pay

Detail: '6509'

	<i>Name</i>		<i>Hours Code</i>	<i>Description</i>
11276	Anderson, Jon D.	09160	10.75 027	w OT Specialty Teams Pay (STP)
11784	Austin, Brent D.	09150 (Meth/SWA	2.00 027	w OT Specialty Teams Pay (STP)
12501	Brannon, Beau	09020 (SWAT)	6.75 027	w OT Specialty Teams Pay (STP)
14672	Brasch, Christopher P.	09020 (SWAT)	6.00 027	w OT Specialty Teams Pay (STP)
20902	Briggs, Nicholas C.	09010 (FTO/PIO/S	8.50 027	w OT Specialty Teams Pay (STP)
11606	Brownlee, Todd W.	09020 (Dig/TAC)	10.00 027	w OT Specialty Teams Pay (STP)
11709	Carpenter, Paul D.	09150	6.75 027	w OT Specialty Teams Pay (STP)
16381	Conrath, Christopher S.	09010 (TAC)	8.50 027	w OT Specialty Teams Pay (STP)
11532	Cordis, Tyler A.	09150 (TAC)	0.33 027	w OT Specialty Teams Pay (STP)
11605	Crane, Christopher R.	09150	6.75 027	w OT Specialty Teams Pay (STP)
14475	Dollard, Arthur L.	09020 (SWAT)	1.00 027	w OT Specialty Teams Pay (STP)
16382	Dotson, Joseph S.	09010 (TAC)	8.50 027	w OT Specialty Teams Pay (STP)
14193	Green, Benjamin T.	09020 (PIO/TAC)	8.50 027	w OT Specialty Teams Pay (STP)
12078	Heuett, Kyle D.	09020 (FTO/SWAT	1.33 027	w OT Specialty Teams Pay (STP)
14702	Johnson, Christopher L.	09020 (SWAT)	6.75 027	w OT Specialty Teams Pay (STP)
11539	Kakuda, Blaine S.	09150 (OutOG/TA	8.50 027	w OT Specialty Teams Pay (STP)
14084	Kernkamp, Jay	09020 (SWAT)	1.00 027	w OT Specialty Teams Pay (STP)
20926	Matt, Joseph A.	09010 (TAC)	8.50 027	w OT Specialty Teams Pay (STP)
11651	Palmer, Bruce H.	09050 (Dig/TAC)	1.00 027	w OT Specialty Teams Pay (STP)
11478	Ponto, Traci R.	09020 (Dig)	1.00 027	w OT Specialty Teams Pay (STP)
11758	Reynolds, Charles J.	09150 (TAC)	8.50 027	w OT Specialty Teams Pay (STP)
10712	Sprague, Dean E.	09160 (TAC)	8.50 027	w OT Specialty Teams Pay (STP)
11954	Storment, Zachary J.	09150 (MCU/SWA	1.00 027	w OT Specialty Teams Pay (STP)
11275	Teigen, Troy D.	09150 (Dig)	10.00 027	w OT Specialty Teams Pay (STP)
11830	Uberuaga, Jason S.	09020 (Dig)	10.00 027	w OT Specialty Teams Pay (STP)
11765	Vaughn, Kevin L.	09020 (Dig/TAC)	10.00 027	w OT Specialty Teams Pay (STP)
12022	Voeller, Ronald R.	09020 (Dig)	10.00 027	w OT Specialty Teams Pay (STP)

# TeleStaff

Payroll Report

03/24/2016 through 03/24/2016

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LIMITED BY

Work Code: w ot

overtime,w OT Special Events Pay,w OT Specialty Teams Pay,w OT Uniform Pay

Detail: '6509'

	<i>Name</i>		<i>Hours Code</i>	<i>Description</i>
21059	Wells, Dale	09010	6.75 027	w OT Specialty Teams Pay (STP)
11956	Woodyard, Amy K.	09110 (Dig/PIO)	10.00 027	w OT Specialty Teams Pay (STP)
			187.17 Hours	



# SPOKANE POLICE DIVISION

## DIRECTOR OF LAW ENFORCEMENT

### JAMES A. MCDEVITT

**BILL TO:**  
Donald Trump Campaign

**DATE:** May 11, 2016

**INVOICE:** SP-2016-1049  
**DIGNITARY SERVICES**

EVENT DATE	OT HRS	OT RATE	AMOUNT
05/03/2016-05/07/2016	955.06		65,124.69
<b>Total of overtime for the month</b>			<b>65,124.69</b>
<b>Less Overtime CAP for the month</b>			
<b>TOTAL</b>			<b>\$ 65,124.69</b>

Signature

Date

US Bank  
Routing #: 125000105  
Account #: 153595286060  
Tax ID: 91-6001280

Contact Name: Angie Chirowamangu  
Spokane Police Accountant  
(509) 625-4072 FAX: (509) 625-4066  
[achirowamangu@spokanecity.org](mailto:achirowamangu@spokanecity.org)

RUN_ID	EMPLID	LAST_NAME	FIRST_NAME	MI	YEAR	DATE	PROGRAM	FUNCTION	TYPE	HOURS	EARNINGS	ERNCD	ACTIVITY	ACTIVITY_DESCR
BW201610	11276	Anderson	Jon	D	2016	05/03/2016	11920	21250	51215	4.00	353.82	27	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	11276	Anderson	Jon	D	2016	05/04/2016	11920	21250	51215	2.83	250.33	27	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	11276	Anderson	Jon	D	2016	05/05/2016	11920	21250	51215	5.82	514.81	27	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	11276	Anderson	Jon	D	2016	05/06/2016	11920	21250	51215	12.00	1,061.46	27	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	11276	Anderson	Jon	D	2016	05/07/2016	11920	21250	51215	11.00	973.00	27	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	11483	Appelwhai	Kenneth	A	2016	05/07/2016	11920	21250	51215	8.00	489.84	27	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	11483	Appelwhai	Kenneth	A	2016	05/07/2016	11920	21250	51215	10.00	4.90	868	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	10711	Arnzen	Alan	J	2016	05/07/2016	11920	21250	51215	10.00	921.33	27	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	11153	Aspaas	Paul	I	2016	05/07/2016	11920	21250	51215	10.00	623.70	27	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	11153	Aspaas	Paul	I	2016	05/07/2016	11920	21250	51215	12.47	12.47	869	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	11784	Austin	Brent	D	2016	05/07/2016	11920	21250	51215	10.50	759.62	27	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	11784	Austin	Brent	D	2016	05/07/2016	11920	21250	51215	7.60	7.60	868	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	11783	Baldwin	Eugene	P	2016	05/07/2016	11920	21250	51215	10.50	631.10	27	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	11783	Baldwin	Eugene	P	2016	05/07/2016	11920	21250	51215	6.31	6.31	868	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	11473	Bartlett	Glenn	F	2016	05/07/2016	11920	21250	51215	10.00	654.00	27	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	11473	Bartlett	Glenn	F	2016	05/07/2016	11920	21250	51215	13.08	13.08	869	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	12348	Beckley	David	M	2016	05/07/2016	11920	21250	51215	10.00	629.70	27	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	12348	Beckley	David	M	2016	05/07/2016	11920	21250	51215	12.59	12.59	869	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	12384	Bishop	Derek	T	2016	05/07/2016	11920	21250	51215	10.50	619.13	27	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	12384	Bishop	Derek	T	2016	05/07/2016	11920	21250	51215	12.38	12.38	869	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	14906	Bode	Christophe	A	2016	05/07/2016	11920	21250	51215	10.50	607.32	27	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	14906	Bode	Christophe	A	2016	05/07/2016	11920	21250	51215	12.15	12.15	869	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	11120	Bowman	Larry	O	2016	05/07/2016	11920	21250	51215	10.00	666.15	27	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	11120	Bowman	Larry	O	2016	05/07/2016	11920	21250	51215	13.32	13.32	869	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	14672	Brasch	Christophe	P	2016	05/07/2016	11920	21250	51215	10.50	607.32	27	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	20902	Briggs	Nicholas	C	2016	05/07/2016	11920	21250	51215	10.50	568.89	27	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	21069	Brownell	Mark	R	2016	05/07/2016	11920	21250	51215	10.00	541.80	27	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	11606	Brownlee	Todd	W	2016	05/07/2016	11920	21250	51215	10.25	616.08	27	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	16853	Bryer	Toby	J	2016	05/07/2016	11920	21250	51215	10.00	567.00	27	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	12286	Buchmann	Paul	W	2016	05/07/2016	11920	21250	51215	10.50	619.13	27	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	12286	Buchmann	Paul	W	2016	05/07/2016	11920	21250	51215	12.38	12.38	869	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	11134	Bulkley	Craig	B	2016	05/07/2016	11920	21250	51215	17.25	1,075.88	27	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	10918	Burbridge	Mark	A	2016	05/07/2016	11920	21250	51215	8.00	532.92	27	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	10918	Burbridge	Mark	A	2016	05/07/2016	11920	21250	51215	10.66	10.66	869	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	11009	Carr	Stacey	L	2016	05/07/2016	11920	21250	51215	10.00	666.15	27	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	11009	Carr	Stacey	L	2016	05/07/2016	11920	21250	51215	13.32	13.32	869	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	11584	Carr	Michael	J	2016	05/07/2016	11920	21250	51215	10.00	723.45	27	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	11093	Carroll	Richard	V	2016	05/07/2016	11920	21250	51215	8.00	498.96	27	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	11708	Cestnik	Brian	D	2016	05/07/2016	11920	21250	51215	10.00	641.85	27	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	11708	Cestnik	Brian	D	2016	05/07/2016	11920	21250	51215	12.84	12.84	869	6469	PRESIDENTIAL CANDIDATE VISITS



BW201610	21067	Childress	Aaron	M	2016	05/07/2016	11920	21250	51215	10.00	541.80	27	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	21067	Childress	Aaron	M	2016	05/07/2016	11920	21250	51215	8.00	5.42	868	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	12023	Christense	James	A	2016	05/07/2016	11920	21250	51215	8.00	480.84	27	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	12023	Christense	James	A	2016	05/07/2016	11920	21250	51215	5.50	4.81	868	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	11532	Cordis	Tyler	A	2016	05/03/2016	11920	21250	51215	10.00	405.41	27	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	11532	Cordis	Tyler	A	2016	05/05/2016	11920	21250	51215	8.00	737.10	27	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	11532	Cordis	Tyler	A	2016	05/03/2016	11920	21250	51215	10.00	8.11	869	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	11532	Cordis	Tyler	A	2016	05/05/2016	11920	21250	51215	10.00	14.74	869	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	11515	Dashiell	Robbie	S	2016	05/07/2016	11920	21250	51215	10.00	737.10	27	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	11515	Dashiell	Robbie	S	2016	05/07/2016	11920	21250	51215	3.00	14.74	869	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	14475	Dollard	Arthur	L	2016	05/06/2016	11920	21250	51215	10.50	173.52	27	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	14475	Dollard	Arthur	L	2016	05/07/2016	11920	21250	51215	10.00	607.32	27	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	16382	Dotson	Joseph	S	2016	05/07/2016	11920	21250	51215	10.00	578.40	27	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	16382	Dotson	Joseph	S	2016	05/07/2016	11920	21250	51215	8.00	5.78	868	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	12025	Draper	Dean	W	2016	05/07/2016	11920	21250	51215	8.00	480.84	27	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	12025	Draper	Dean	W	2016	05/07/2016	11920	21250	51215	10.00	9.62	869	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	11953	Eckersley	Brian	G	2016	05/07/2016	11920	21250	51215	10.00	723.45	27	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	11953	Eckersley	Brian	G	2016	05/07/2016	11920	21250	51215	10.00	7.23	868	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	11568	Erickson	James	W	2016	05/07/2016	11920	21250	51215	10.00	612.30	27	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	11568	Erickson	James	W	2016	05/07/2016	11920	21250	51215	10.00	12.25	869	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	11710	Eriksen	Devin	D	2016	05/07/2016	11920	21250	51215	10.00	601.05	27	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	11710	Eriksen	Devin	D	2016	05/07/2016	11920	21250	51215	10.00	13.82	869	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	20977	Fabian	Brandon	P	2016	05/07/2016	11920	21250	51215	10.00	541.80	27	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	20977	Fabian	Brandon	P	2016	05/07/2016	11920	21250	51215	10.00	10.84	869	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	12018	Frye	Mandi	L	2016	05/07/2016	11920	21250	51210	9.50	493.99	185	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	12018	Frye	Mandi	L	2016	05/07/2016	11920	21250	51290	2.67	LP3		6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	14457	Geren	Nicholas	G	2016	05/07/2016	11920	21250	51215	10.00	617.70	27	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	16880	Gobble	Nathanael	G.	2016	05/07/2016	11920	21250	51215	10.00	541.80	27	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	16880	Gobble	Nathanael	G.	2016	05/07/2016	11920	21250	51215	10.00	5.42	868	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	21537	Gonsalves	Keith	H	2016	05/07/2016	11920	21250	51215	10.00	541.80	27	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	21537	Gonsalves	Keith	H	2016	05/07/2016	11920	21250	51215	10.00	10.84	869	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	10872	Grant	Gordon	M	2016	05/07/2016	11920	21250	51215	8.00	498.96	27	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	14193	Green	Benjamin	T	2016	05/07/2016	11920	21250	51215	10.00	578.40	27	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	14193	Green	Benjamin	T	2016	05/07/2016	11920	21250	51215	8.00	11.57	869	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	11481	Griffin	John	W	2016	05/07/2016	11920	21250	51215	8.00	589.68	27	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	11481	Griffin	John	W	2016	05/07/2016	11920	21250	51215	8.00	11.79	869	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	12227	Hamilton	Craig	D	2016	05/07/2016	11920	21250	51215	8.00	471.72	27	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	21536	Hice	Scott	H	2016	05/07/2016	11920	21250	51215	10.00	541.80	27	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	21536	Hice	Scott	H	2016	05/07/2016	11920	21250	51215	10.00	10.84	869	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	11514	Honaker	Kristopher	C	2016	05/07/2016	11920	21250	9020	10.00	612.30	25	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	11514	Honaker	Kristopher	C	2016	05/07/2016	11920	21250	51215	10.00	18.37	869	6469	PRESIDENTIAL CANDIDATE VISITS

BW201610	12076	Howe	Dustin	S	2016	05/07/2016	11920	21250	51215	10.00	641.85	27	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	12076	Howe	Dustin	S	2016	05/07/2016	11920	21250	51215	10.00	6.42	868	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	14908	Jamieson	Ryan	S	2016	05/07/2016	11920	21250	51215	5.00	289.20	27	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	14908	Jamieson	Ryan	S	2016	05/07/2016	11920	21250	51215	10.50	5.78	869	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	14702	Johnson	Christophe	L	2016	05/07/2016	11920	21250	51215	10.50	607.32	27	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	14702	Johnson	Christophe	L	2016	05/07/2016	11920	21250	51215	10.50	12.15	869	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	11917	Keller	Kevin	P	2016	05/07/2016	11920	21250	51215	10.50	759.62	27	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	11917	Keller	Kevin	P	2016	05/07/2016	11920	21250	51215	10.00	7.60	868	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	11122	Kennedy	David	J	2016	05/07/2016	11920	21250	51215	10.00	623.70	27	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	14084	Kernkamp	Jay	E	2016	05/07/2016	11920	21250	51215	10.50	607.32	27	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	14084	Kernkamp	Jay	E	2016	05/07/2016	11920	21250	51215	10.00	12.15	869	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	16846	Kirn	Christophe	F	2016	05/07/2016	11920	21250	51215	10.00	567.00	27	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	16846	Kirn	Christophe	F	2016	05/07/2016	11920	21250	51215	10.50	11.34	869	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	15659	Lesser	Robert	S	2016	05/07/2016	11920	21250	51215	10.50	607.32	27	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	11530	Lewis	Christophe	M	2016	05/07/2016	11920	21250	51215	8.00	489.84	27	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	11530	Lewis	Christophe	M	2016	05/07/2016	11920	21250	51215	10.00	9.80	869	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	10919	Mann	Susan	M	2016	05/07/2016	11920	21250	51215	10.00	623.70	27	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	15407	Mason	Dion	M	2016	05/07/2016	11920	21250	51215	10.00	578.40	27	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	15407	Mason	Dion	M	2016	05/07/2016	11920	21250	51215	10.00	578.40	27	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	20926	Matt	Joseph	A	2016	05/07/2016	11920	21250	51215	10.00	541.80	27	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	20926	Matt	Joseph	A	2016	05/07/2016	11920	21250	51215	10.00	10.84	869	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	14706	Matthew	Yeshua		2016	05/07/2016	11920	21250	51215	10.00	578.40	27	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	10921	McCabe	David	E	2016	05/07/2016	11920	21250	51215	10.00	900.90	27	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	12205	McCasland	Michael	J	2016	05/07/2016	11920	21250	51215	8.00	471.72	27	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	12205	McCasland	Michael	J	2016	05/07/2016	11920	21250	51215	10.00	4.72	868	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	11472	McIntyre	Sandra	J	2016	05/07/2016	11920	21250	51215	10.00	612.30	27	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	11472	McIntyre	Sandra	J	2016	05/07/2016	11920	21250	51215	10.00	6.12	868	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	14320	McVay	Jeremy	J	2016	05/07/2016	11920	21250	51215	10.50	607.32	27	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	12503	Nollmeyer	Trevor	W	2016	05/07/2016	11920	21250	51215	8.00	471.72	27	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	12503	Nollmeyer	Trevor	W	2016	05/07/2016	11920	21250	51215	10.00	9.43	869	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	11714	Oliver	Janice	L	2016	05/07/2016	11920	21250	51215	10.00	641.85	27	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	12289	Ottmar	Timothy	J	2016	05/06/2016	11920	21250	51215	4.00	235.86	27	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	12289	Ottmar	Timothy	J	2016	05/07/2016	11920	21250	51215	10.00	589.65	27	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	12289	Ottmar	Timothy	J	2016	05/06/2016	11920	21250	51215	10.00	2.36	868	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	12289	Ottmar	Timothy	J	2016	05/07/2016	11920	21250	51215	10.00	5.90	868	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	11651	Palmer	Bruce	H	2016	05/06/2016	11920	21250	9050	4.00	256.74	25	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	11651	Palmer	Bruce	H	2016	05/07/2016	11920	21250	51215	10.25	657.90	27	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	11651	Palmer	Bruce	H	2016	05/06/2016	11920	21250	51215	10.00	7.70	869	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	11651	Palmer	Bruce	H	2016	05/07/2016	11920	21250	51215	10.00	13.16	869	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	11339	Pavlischak	Charles	J	2016	05/07/2016	11920	21250	51215	10.50	642.92	27	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	12287	Pegram	Shawn	M	2016	05/07/2016	11920	21250	51215	10.00	589.65	27	6469	PRESIDENTIAL CANDIDATE VISITS

BW201610	12287	Pegram	Shawn	M	2016	05/07/2016	11920	21250	51215	11.79	869	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	11478	Ponto	Traci	R	2016	05/07/2016	11920	21250	51215	627.61	27	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	11478	Ponto	Traci	R	2016	05/07/2016	11920	21250	51215	6.28	868	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	11832	Raleigh	Erin	C	2016	05/07/2016	11920	21250	51215	601.05	27	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	11832	Raleigh	Erin	C	2016	05/07/2016	11920	21250	51215	12.02	869	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	21835	Rankin	Brandon	J	2016	05/07/2016	11920	21250	51215	349.05	27	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	21835	Rankin	Brandon	J	2016	05/07/2016	11920	21250	51215	6.98	869	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	10821	Reisnauel	Charles	D	2016	05/04/2016	11120	21700	51215	152.88	27	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	10821	Reisnauel	Charles	D	2016	05/06/2016	11120	21700	51215	305.76	27	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	10821	Reisnauel	Charles	D	2016	05/07/2016	11920	21250	51215	649.74	27	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	10821	Reisnauel	Charles	D	2016	05/04/2016	11120	21700	51215	3.06	869	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	10821	Reisnauel	Charles	D	2016	05/06/2016	11120	21700	51215	6.12	869	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	10821	Reisnauel	Charles	D	2016	05/07/2016	11920	21250	51215	12.99	869	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	10779	Richards	David	W	2016	05/07/2016	30210	21100	51225	1,082.40	176	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	11711	Roberge	Michael	D	2016	05/07/2016	11920	21250	51215	601.05	27	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	21052	Scott	John	H	2016	05/07/2016	11920	21250	51215	541.80	27	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	21052	Scott	John	H	2016	05/07/2016	11920	21250	51215	10.84	869	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	21062	Shrier	Brian	S	2016	05/07/2016	11920	21250	51215	541.80	27	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	11612	Snider	Ryan	H	2016	05/07/2016	11920	21250	51215	601.05	27	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	11612	Snider	Ryan	H	2016	05/07/2016	11920	21250	51215	12.02	869	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	11757	Spiering	Nathan	J	2016	05/07/2016	11920	21250	51215	641.85	27	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	11757	Spiering	Nathan	J	2016	05/07/2016	11920	21250	51215	12.84	869	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	10712	Sprague	Dean	E	2016	05/03/2016	11920	21250	51215	276.09	27	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	22114	Stewart	Matthew	S	2016	05/07/2016	11920	21250	51215	541.80	27	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	13750	Storch	Shaidon	P	2016	05/07/2016	11920	21250	51215	471.72	27	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	13750	Storch	Shaidon	P	2016	05/07/2016	11920	21250	51215	4.72	868	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	11954	Stormont	Zachary	J	2016	05/07/2016	11920	21250	51215	759.62	27	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	11954	Stormont	Zachary	J	2016	05/07/2016	11920	21250	51215	8.41	868	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	11754	Strosahl	Douglas	S	2016	05/07/2016	11920	21250	51215	601.05	27	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	11754	Strosahl	Douglas	S	2016	05/07/2016	11920	21250	51215	6.01	868	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	11275	Teigen	Troy	D	2016	05/06/2016	11920	21250	9150	331.70	25	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	11275	Teigen	Troy	D	2016	05/07/2016	11920	21250	51215	706.14	27	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	11830	Uberuaga	Jason	S	2016	05/07/2016	11920	21250	51215	616.08	27	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	11830	Uberuaga	Jason	S	2016	05/07/2016	11920	21250	51215	19.53	869	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	14194	Valdez	Adam	N	2016	05/07/2016	11920	21250	51215	578.40	27	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	21567	Valencia	Andres	F	2016	05/07/2016	11920	21250	51215	397.05	27	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	11765	Vaughn	Kevin	L	2016	05/07/2016	11920	21250	51215	350.41	27	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	11765	Vaughn	Kevin	L	2016	05/07/2016	11920	21250	51215	3.50	868	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	12022	Voeller	Ronald	R	2016	05/07/2016	11920	21250	51215	616.08	27	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	12022	Voeller	Ronald	R	2016	05/07/2016	11920	21250	51215	12.32	869	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	14195	Wheeler	Sean	D	2016	05/07/2016	11920	21250	51215	607.32	27	6469	PRESIDENTIAL CANDIDATE VISITS

BW201610	14195	Wheeler	Sean	D	2016	05/07/2016	11920	21250	51215	12.15	869	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	15371	Wilkinson	Rhian	S	2016	05/07/2016	11920	21250	51215	578.40	27	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	11669	Wohl	Steven	J	2016	05/07/2016	11920	21250	51215	928.78	27	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	11123	Workman	William	D	2016	05/07/2016	11920	21250	51215	498.96	27	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	11123	Workman	William	D	2016	05/07/2016	11920	21250	51215	4.99	868	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	20731	Yen	John	W	2016	05/07/2016	11920	21250	51215	541.80	27	6469	PRESIDENTIAL CANDIDATE VISITS
BW201610	20731	Yen	John	W	2016	05/07/2016	11920	21250	51215	10.84	869	6469	PRESIDENTIAL CANDIDATE VISITS
									955.06	61,046.77			

Social Security	0.0145	885.18
POLL	0.0523	3,192.75
<b>TOTAL OT &amp; Benefits</b>		<b>65,124.69</b>

# TeleStaff

## Payroll Report

05/03/2016 through 05/07/2016

Period NOT Finalized

LIMITED BY

Work Code: w OT Civilian Day Pay,w OT Civilian Grave Pay,w OT Civilian Swing Pay,w OT Special Events Comp,w OT Special Events Pay,w OT Specialty Teams Call In Comp,w OT Specialty Teams Call In Pay,w OT Specialty Teams Comp,w OT Specialty...

	<i>Name</i>		<i>Hours</i>	<i>Code</i>	<i>Description</i>
11276	Anderson, Jon D.	09160	35.65	027	w OT Specialty Teams Pay (STP)
11483	Applewhaite, Kenneth A.	09020	8.00	027	w OT Specialty Teams Pay (STP)
10711	Arnzen, Alan J.	09160	10.00	027	w OT Specialty Teams Pay (STP)
11153	Aspaas, Paul I.	09040	10.00	027	w OT Specialty Teams Pay (STP)
11784	Austin, Brent D.	09150 (Meth/SWA	10.50	027	w OT Specialty Teams Pay (STP)
11783	Baldwin, Eugene P.	09020 (FTO/SWAT	10.50	027	w OT Specialty Teams Pay (STP)
11473	Bartlett, Glenn F.	09150 (OutOG/PIC	10.00	027	w OT Specialty Teams Pay (STP)
12348	Beckley, David M.	09110	10.00	027	w OT Specialty Teams Pay (STP)
12384	Bishop, Derek T.	09020 (SWAT)	10.50	027	w OT Specialty Teams Pay (STP)
14906	Bode, Christopher A.	09020 (FTO/SWAT	10.50	027	w OT Specialty Teams Pay (STP)
11120	Bowman, Larry O.	09050 (Meth)	10.00	027	w OT Specialty Teams Pay (STP)
14672	Brasch, Christopher P.	09020 (SWAT)	10.50	027	w OT Specialty Teams Pay (STP)
20902	Briggs, Nicholas C.	09010 (FTO/PIO/S	10.50	027	w OT Specialty Teams Pay (STP)
21069	Brownell, Mark	09010 (TAC)	10.00	027	w OT Specialty Teams Pay (STP)
11606	Brownlee, Todd W.	09020 (Dig/TAC)	10.25	027	w OT Specialty Teams Pay (STP)
16853	Bryer, Toby J.	09020 (TAC)	10.00	027	w OT Specialty Teams Pay (STP)
12286	Buchmann, Paul W.	09020 (SWAT)	10.50	027	w OT Specialty Teams Pay (STP)
11134	Bulkley, Craig B.	09040	7.00	027	w OT Special Events Pay (SEP)
			10.25	027	w OT Specialty Teams Pay (STP)
			17.25		
10918	Burbridge, Mark A.	09050	8.00	027	w OT Specialty Teams Pay (STP)
11584	Carr, Michael J.	09150	10.00	027	w OT Specialty Teams Pay (STP)
11009	Carr, Stacey L.	09050	10.00	027	w OT Specialty Teams Pay (STP)
11093	Carroll, Richard V.	09020	8.00	027	w OT Specialty Teams Pay (STP)
11708	Cestnik, Brian D.	09050 (MCU)	10.00	027	w OT Specialty Teams Pay (STP)
21067	Childress, Aaron	09010	10.00	027	w OT Specialty Teams Pay (STP)
12023	Christensen, James A.	09020	8.00	027	w OT Specialty Teams Pay (STP)
11532	Cordis, Tyler A.	09150 (TAC)	15.50	027	w OT Specialty Teams Pay (STP)

# TeleStaff

## Payroll Report

05/03/2016 through 05/07/2016

Period NOT Finalized

LIMITED BY

Work Code: w OT Civilian Day Pay,w OT Civilian Grave Pay,w OT Civilian Swing Pay,w OT Special Events Comp,w OT Special Events Pay,w OT Specialty Teams Call In Comp,w OT Specialty Teams Call In Pay,w OT Specialty Teams Comp,w OT Specialty...

	<i>Name</i>		<i>Hours</i>	<i>Code</i>	<i>Description</i>
11515	Dashiell, Robbie S.	09150 (EDU)	10.00	027	w OT Specialty Teams Pay (STP)
14475	Dollard, Arthur L.	09020 (SWAT)	13.50	027	w OT Specialty Teams Pay (STP)
16382	Dotson, Joseph S.	09020 (TAC)	10.00	027	w OT Specialty Teams Pay (STP)
12025	Draper, Dean W.	09020	8.00	027	w OT Specialty Teams Pay (STP)
11953	Eckersley, Brian G.	09150 (TAC)	10.00	027	w OT Specialty Teams Pay (STP)
11568	Erickson, James W.	09020 (Dig)	10.00	027	w OT Specialty Teams Pay (STP)
11710	Eriksen, Devin D.	09020 (EDU)	10.00	027	w OT Specialty Teams Pay (STP)
20977	Fabian, Brandon P.	09010 (TAC)	10.00	027	w OT Specialty Teams Pay (STP)
12018	Frye, Mandi L.	02790	9.50	185	wOT Call In Day Civilian (CallInD)
14457	Geren, Nicholas G.	09050	10.00	027	w OT Specialty Teams Pay (STP)
16880	Gobble, Nathanael G.	09010 (TAC)	10.00	027	w OT Specialty Teams Pay (STP)
21537	Gonsalves, Keith H.	09010 (TAC)	10.00	027	w OT Specialty Teams Pay (STP)
10872	Grant, Gordon M.	09020	8.00	027	w OT Specialty Teams Pay (STP)
14193	Green, Benjamin T.	09020 (PIO/TAC)	10.00	027	w OT Specialty Teams Pay (STP)
11481	Griffin, John W.	09150	8.00	027	w OT Specialty Teams Pay (STP)
12227	Hamilton, Craig D.	09020 (PIO)	8.00	027	w OT Specialty Teams Pay (STP)
21536	Hice, Scott H.	09010	10.00	027	w OT Specialty Teams Pay (STP)
11514	Honaker, Kristopher C.	09020 (FTO)	10.00	025	w OT Specialty Teams Comp (STC)
12076	Howe, Dustin S.	09050 (TAC)	10.00	027	w OT Specialty Teams Pay (STP)
14908	Jamieson, Ryan S.	09020 (TAC)	5.00	027	w OT Specialty Teams Pay (STP)
14702	Johnson, Christopher L.	09020 (SWAT)	10.50	027	w OT Specialty Teams Pay (STP)
11917	Keller, Kevin P.	09150 (SWAT)	10.50	027	w OT Specialty Teams Pay (STP)
11122	Kennedy, David J.	09040	10.00	027	w OT Specialty Teams Pay (STP)
14084	Kernkamp, Jay	09020 (SWAT)	10.50	027	w OT Specialty Teams Pay (STP)
16846	Kirn, Christopher F.	09020 (H)	10.00	027	w OT Specialty Teams Pay (STP)
15659	Lesser, Scott	09020 (SWAT)	10.50	027	w OT Specialty Teams Pay (STP)
11530	Lewis, Christopher M.	09020	8.00	027	w OT Specialty Teams Pay (STP)

# TeleStaff

## Payroll Report

05/03/2016 through 05/07/2016

Period NOT Finalized

LIMITED BY

Work Code: w OT Civilian Day Pay,w OT Civilian Grave Pay,w OT Civilian Swing Pay,w OT Special Events  
Comp,w OT Special Events Pay,w OT Specialty Teams Call In Comp,w OT Specialty Teams Call In Pay,w OT  
Specialty Teams Comp,w OT Specialty...

	<i>Name</i>		<i>Hours</i>	<i>Code</i>	<i>Description</i>
10919	Mann, Susan M.	09040	10.00	027	w OT Specialty Teams Pay (STP)
15407	Mason, Dion	09020	10.00	027	w OT Specialty Teams Pay (STP)
20926	Matt, Joseph A.	09010 (TAC)	10.00	027	w OT Specialty Teams Pay (STP)
14706	Matthew, Yeshua	09020	10.00	027	w OT Specialty Teams Pay (STP)
10921	McCabe, David E.	09160	10.00	027	w OT Specialty Teams Pay (STP)
12205	Mccasland, Michael J.	09020	8.00	027	w OT Specialty Teams Pay (STP)
11472	Mcintyre, Sandra J.	09020	10.00	027	w OT Specialty Teams Pay (STP)
14320	Mcvay, Jeremy	09020 (SWAT)	10.50	027	w OT Specialty Teams Pay (STP)
12503	Nollmeyer, Trevor	09020 (TAC)	8.00	027	w OT Specialty Teams Pay (STP)
11714	Oliver, Janice L.	09050 (PIO)	10.00	027	w OT Specialty Teams Pay (STP)
12289	Ottmar, Timothy J.	09020 (FTO)	14.00	027	w OT Specialty Teams Pay (STP)
11651	Palmer, Bruce H.	09050 (Dig/TAC)	4.00	025	w OT Specialty Teams Comp (STC)
			10.25	027	w OT Specialty Teams Pay (STP)
			14.25		
11339	Pavlishak, Charles J.	09020 (SWAT)	10.50	027	w OT Specialty Teams Pay (STP)
12287	Pegram, Shawn M.	09020 (EDU)	10.00	027	w OT Specialty Teams Pay (STP)
11478	Ponto, Traci R.	09020 (Dig)	10.25	027	w OT Specialty Teams Pay (STP)
11832	Raleigh, Erin C.	09020 (EDU)	10.00	027	w OT Specialty Teams Pay (STP)
21835	Rankin, Brandon J.	09010 (PROB)	10.00	027	w OT Specialty Teams Pay (STP)
10821	Reisenauer, Charles D.	09150	5.50	027	w OT Special Events Pay (SEP)
			9.00	027	w OT Specialty Teams Pay (STP)
			14.50		
10779	Richards, David W.	09170	10.00	176	wOT DSO call out (DS)
11711	Roberge, Michael D.	09020	10.00	027	w OT Specialty Teams Pay (STP)
21052	Scott, John	09010	10.00	027	w OT Specialty Teams Pay (STP)
21062	Shrier, Brian	09010 (MCU)	10.00	027	w OT Specialty Teams Pay (STP)
11612	Snider, Ryan H.	09020 (H)	10.00	027	w OT Specialty Teams Pay (STP)
11757	Spiering, Nathan J.	09110	10.00	027	w OT Specialty Teams Pay (STP)

# TeleStaff

## Payroll Report

05/03/2016 through 05/07/2016

Period NOT Finalized

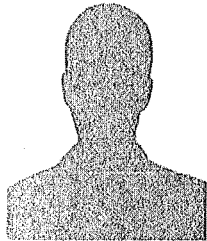
LIMITED BY

Work Code: w OT Civilian Day Pay,w OT Civilian Grave Pay,w OT Civilian Swing Pay,w OT Special Events  
Comp,w OT Special Events Pay,w OT Specialty Teams Call In Comp,w OT Specialty Teams Call In Pay,w OT  
Specialty Teams Comp,w OT Specialty...

	<i>Name</i>		<i>Hours</i>	<i>Code</i>	<i>Description</i>
10712	Sprague, Dean E.	09160 (TAC)	3.00	027	w OT Specialty Teams Pay (STP)
22114	Stewart, Matthew S.	09010 (PROB)	10.00	027	w OT Specialty Teams Pay (STP)
13750	Storch, Shaidon	09020	8.00	027	w OT Specialty Teams Pay (STP)
11954	Storment, Zachary J.	09150 (MCU/SWA	10.50	027	w OT Specialty Teams Pay (STP)
11754	Strosahl, Douglas S.	09020	10.00	027	w OT Specialty Teams Pay (STP)
11275	Teigen, Troy D.	09150 (Dig)	4.50	025	w OT Specialty Teams Comp (STP)
			9.58	027	w OT Specialty Teams Pay (STP)
			14.08		
11830	Uberuaga, Jason S.	09020 (Dig)	10.25	027	w OT Specialty Teams Pay (STP)
14194	Valdez, Adam N.	09020 (H)	10.00	027	w OT Specialty Teams Pay (STP)
21567	Valencia, Andres F.	09010 (PROB)	10.00	027	w OT Specialty Teams Pay (STP)
11765	Vaughn, Kevin L.	09020 (Dig/TAC)	5.83	027	w OT Specialty Teams Pay (STP)
12022	Voeller, Ronald R.	09020 (Dig)	10.25	027	w OT Specialty Teams Pay (STP)
14195	Wheeler, Sean D.	09150 (OutOG/SW	10.50	027	w OT Specialty Teams Pay (STP)
15371	Wilkinson, Rhian	09020 (TAC)	10.00	027	w OT Specialty Teams Pay (STP)
11669	Wohl, Steven J.	09160 (H/SWAT)	10.50	027	w OT Specialty Teams Pay (STP)
11123	Workman, William D.	09040	8.00	027	w OT Specialty Teams Pay (STP)
20731	Yen, John W.	09010 (TAC)	10.00	027	w OT Specialty Teams Pay (STP)
			955.07	Hours	



# Case Details: 50-2016-MH-002544-XXXX-SB



**Full Name** HERB, JAMES ALLAN **Arrest Date**  
**Party Type** PETITIONER **DOB**  
**Case #** 50-2016-MH-002544-XXXX-SB **Sex**  
**Citation #** **Race**  
**Booking #** **Division** IZ: South Branch Probate - IZ  
**Offense Date** **Speedy Trial Du**

## Court Events

No Court Events Found.

## Main Parties

**Judge:** TICKTIN, JUDGEJESSICA

## Parties

Full Name	Party Type	Sex	Race	Date of Birth	AKA	Deceased	License #	DL Exp Date	Sheriffs #	Hair
TRUMP, DONALD J	ALLEGED INCAPACITATED PERSON						-			
HERB, JAMES ALLAN	PETITIONER						-			

## Charges

No Charges Found.

## Linked Cases

No Linked Cases Found.

## Sentences

No Sentences Found.

## Warrants/Service Docs

No Warrants/Service Docs Found.

## Dockets

Image	Seq #	Effective Date	Count	Description	Docket Text	Book	Page
1	1	10/4/2016		PETITION TO DETERMINE INCAP	F/B PET JAMES A HERB		
0	2	10/5/2016		DIVISION ASSIGNMENT	IZ: South Branch Probate - IZ (CIVIL)		
1	3	10/5/2016		PAID \$232.00 ON RECEIPT 1865499	\$232.00 1865499 Fully Paid		

## Arrests

No Arrests Found.

## Bonds

No Bonds Found.

## Fees

Effective Date	Due Date	Description	Amount Due	Amount Paid	Balance	In Collections	In Judgment
10/5/2016	10/5/2016	508FF Determination of Incompetency	\$232.00	\$232.00	\$0.00		

## Total Fees

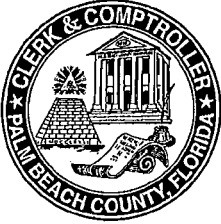
**Total Amount Due: \$232.00    Total Amount Paid: \$232.00    Total Balance: \$0.00    Total Judgment Interest: \$0.00**  
**Total Balance + Interest: \$0.00**

## Payment Plans

No Payment Plans Found.

**Document is being processed. Please check  
back later.**

SEE  
ATTACHED  
PETITION



SHARON R. BOCK

**RECEIPT**

1865499

CLERK & COMPTROLLER  
PALM BEACH COUNTY, FLORIDA

Printed On:  
10/05/2016 12:03  
Page 1 of 1

Receipt Number: 1865499 - Date 10/05/2016 Time 12:03PM			
Received of:	James Allan Herb 2200 Corporate Blvd NW Suite 315 Boca Raton, FL 33431		
Cashier Name:	ADMIN	Balance Owed:	232.00
Cashier Location:	E-Filing	Total Amount Paid:	232.00
Receipt ID:	8058599	Remaining Balance:	0.00
Division:	IZ: South Branch Probate - IZ(Civil)		
Case# 50-2016-MH-002544-XXXX-SB -- Petitioner: HERB, JAMES ALLAN			
Item	Balance	Paid	Bal Remaining
Fees	232.00	232.00	0.00
<b>Case Total</b>	<b>232.00</b>	<b>232.00</b>	<b>0.00</b>
Payments			
Type	Ref#	Amount	
EFILING	16744821	232.00	
<b>Total Received</b>		<b>232.00</b>	
<b>Total Paid</b>		<b>232.00</b>	

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Visit [www.mypalmbeachclerk.com](http://www.mypalmbeachclerk.com) or call (561) 355-2996.

IN THE CIRCUIT COURT OF THE FIFTEENTH JUDICIAL  
CIRCUIT IN AND FOR PALM BEACH COUNTY, FLORIDA

IN RE: PETITION TO DETERMINE  
INCAPACITY OF DONALD J. TRUMP,  
an Alleged Incapacitated Person

Case No. 502016MH002544XXXXSB  
Probate Div. IZ

**PETITION TO DETERMINE INCAPACITY**

Petitioner, James A. Herb, alleges:

1. Petitioner is an adult, more than 21 years of age, whose present address is 2403 N.W. 30<sup>th</sup> Street, Boca Raton, Florida 33431. Petitioner is not related to the hereafter named Alleged Incapacitated Person, but is a person authorized to bring this PETITION TO DETERMINE INCAPACITY pursuant to Florida Statutes Section 744.3201(1); also see *Katke v. Bersche*, 161 So.2d 574 (Fla. 5<sup>th</sup> DCA 2014).
2. Petitioner believes DONALD J. TRUMP, age 70, a resident of Palm Beach County, Florida, whose primary spoken language is English, and whose present Florida address is believed to be 1094 S. Ocean Blvd., Palm Beach, Florida, is or may be incapacitated, based upon the following factual information:
  - A. His actions/statements appear to support a diagnosis as having Histrionic Personality Disorder, DSM-V 301.50, in that he meets the Diagnostic Criteria of 1. through 8. (see Exhibit "1" from DSM-V, attached and incorporated herein).
  - B. His actions/statements appear to support a diagnosis as having Narcissistic Personality Disorder, DSM-V 301.81, in that he meets the Diagnostic Criteria of 1. through 9. (see Exhibit "2" from DSM-V, attached and incorporated herein).
  - C. More specific facts (quotations from the Alleged Incapacitated Person, hereinafter "AIP") are as set forth in Exhibit "3", attached and incorporated herein.
3. The names and addresses of persons known to petitioner who have knowledge of such facts through personal observations are:

The Honorable Jeb Bush, Former Governor of Florida  
1825 Ponce de Leon Blvd.  
Suite 263  
Coral Gables, FL 33134

In Re Petition to Determine Incapacity of Donald J. Trump  
Circuit Court for Palm Beach County, Florida  
Case No. \_\_\_\_\_, Probate Division IY

The Honorable Chris Christie, Governor of New Jersey  
P. O. Box 001  
Trenton, New Jersey 08625

The Honorable Ted Cruz, U.S. Senator from Texas  
404 Russell  
Washington, DC 20510

The Honorable John Kasich, Governor of Ohio  
Riffe Center, 30<sup>th</sup> Floor  
77 South High Street  
Columbus, Ohio 43215

The Honorable Scott Walker, Governor of Wisconsin  
115 East Capitol  
Madison, Wisconsin 53702

Lindsey Graham, U.S. Senator from South Carolina  
P. O. Box 1801  
Columbia, South Carolina 29202

Rick Perry, Former Governor of Texas  
1010 Colorado Street  
Austin, Texas 78701

Marco Rubio, U.S. Senator from Florida  
8669 N.W. 36<sup>th</sup> Street, Suite 110  
Doral, Florida 33166

Mitt Romney, Former Governor of Massachusetts  
171 Marsh Street  
Bellmont, Massachusetts 02478

William Kristol, Editor of The Weekly Standard  
P. O. Box 96114  
Washington, DC 20077

Tony Schwartz, Co-Author of "The Art of the Deal"  
620 8<sup>th</sup> Avenue  
New York, New York 10018

In Re Petition to Determine Incapacity of Donald J. Trump  
Circuit Court for Palm Beach County, Florida  
Case No. \_\_\_\_\_, Probate Division IY

Reince Priebus  
310 First Street SE  
Washington, DC 20003

Paul Ryan, U.S. Representative from Wisconsin  
1233 Longworth HOB  
Washington, DC 20515

John McCain, U.S. Senator from Arizona  
241 Russell Senate Office Building  
Washington, DC 20510

Various commentators, journalists, psychologists, or others, including: Psychologist Ben Michaelis; Psychologist George Simon, Psychotherapist Steve Becker; Psychiatrist Robert Klitzman; James Hamblin; Sam Stein; Representative Karen Bass; signers on the petition by Representative Karen Bass on change.org, #DiagnoseTrump; Peggy Noonan; David Brooks; Charles Krauthammer; Attorney Thomas M. Wells; Eugene Robinson; Robert Kagan; Steven Hayes; Mark Cuban; Dr. Jerome Kroll; Dr. Claire Pouncey; Michael Bloomberg.

Millions of citizens of the United States who have seen the AIP at rallies, debates, and/or on the television.

4. The AIP is or may be incapable of exercising the following rights:

- |   |  |
|---|--|
| <input type="checkbox"/> to marry   | <input type="checkbox"/> to vote                                 |
| <input type="checkbox"/> to contract  | <input type="checkbox"/> to travel                               |
| <input type="checkbox"/> to sue and defend lawsuits   | <input type="checkbox"/> to have a driver's license              |
| <input type="checkbox"/> to determine his residency   | <input checked="" type="checkbox"/> to seek or retain employment |
| <input type="checkbox"/> to consent to medical treatment  |  |
| <input type="checkbox"/> to personally apply for government benefits  |  |
| <input type="checkbox"/> to manage property or to make any gift or disposition of property                  |  |
| <input type="checkbox"/> to make decisions about his social environment or other social aspects of his life |  |

5. Petitioner is seeking a LIMITED guardianship.

6. Petitioner is not aware of any alternatives to guardianship that will sufficiently address the problems of the AIP.

7. The names, addresses and relationships of all known next of kin of the AIP are (give dates

In Re Petition to Determine Incapacity of Donald J. Trump  
 Circuit Court for Palm Beach County, Florida  
 Case No. \_\_\_\_\_, Probate Division IY

of birth of any who are minors):

<u>Name &amp; Address</u>	<u>Relationship</u>	<u>Date of Birth (Minor)</u>
Melania Trump 1094 Ocean Blvd. Palm Beach, Florida	Spouse	Adult
Ivanka M. Trump 725 5 <sup>th</sup> Avenue, 25FL New York, New York 10022	Daughter	Adult
Donald J. Trump, Jr. 425 58 <sup>th</sup> St. 12CD New York, New York 10022	Son	Adult
Eric F. Trump 100 Central Park Apt. 14D New York, New York 10019	Son	Adult
Tiffany Trump 160 62 <sup>nd</sup> Street New York, New York 10023	Daughter	Adult
Barron William Trump 1094 Ocean Blvd. Palm Beach, Florida	Son	March 2006

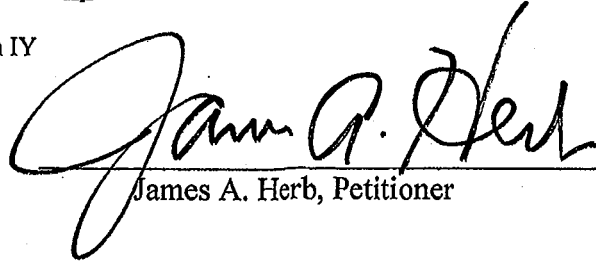
8. The AIP's attending or family physician is Harold Bornstein, M.D., 101 East 78<sup>th</sup> Street, New York, New York 10075-0301.

Petitioner requests that an examination be made as to the mental condition of the AIP as provided by law, and that an order be entered determining the mental capacity of said AIP.

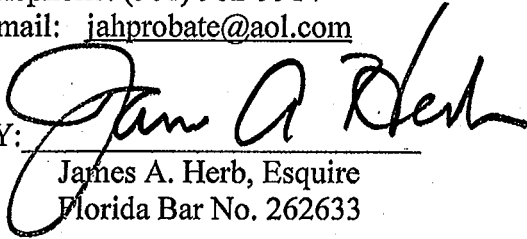
Under penalties of perjury, I declare that I have read the foregoing, and the facts alleged are true, to the best of my knowledge and belief.

In Re Petition to Determine Incapacity of Donald J. Trump  
Circuit Court for Palm Beach County, Florida  
Case No. \_\_\_\_\_, Probate Division IY

Signed on October 4, 2016.

  
James A. Herb, Petitioner

James A. Herb, Esquire  
Attorney for Petitioner  
2200 Corp. Blvd. N.W., Suite 315  
Boca Raton, Florida 33431  
Telephone: (561) 982-9914  
e-mail: [jahprobate@aol.com](mailto:jahprobate@aol.com)

BY:   
James A. Herb, Esquire  
Florida Bar No. 262633



**Exhibit “1”**

**Exhibit “1”**

## Histrionic Personality Disorder

### Diagnostic Criteria

301.50 (F60.4)

A pervasive pattern of excessive emotionality and attention seeking, beginning by early adulthood and present in a variety of contexts, as indicated by five (or more) of the following:

1. Is uncomfortable in situations in which he or she is not the center of attention.
2. Interaction with others is often characterized by inappropriate sexually seductive or provocative behavior.
3. Displays rapidly shifting and shallow expression of emotions.
4. Consistently uses physical appearance to draw attention to self.
5. Has a style of speech that is excessively impressionistic and lacking in detail.
6. Shows self-dramatization, theatricality, and exaggerated expression of emotion.
7. Is suggestible (i.e., easily influenced by others or circumstances).
8. Considers relationships to be more intimate than they actually are.

### Diagnostic Features

The essential feature of histrionic personality disorder is pervasive and excessive emotionality and attention-seeking behavior. This pattern begins by early adulthood and is present in a variety of contexts.

Individuals with histrionic personality disorder are uncomfortable or feel unappreciated when they are not the center of attention (Criterion 1). Often lively and dramatic, they tend to draw attention to themselves and may initially charm new acquaintances by their enthusiasm, apparent openness, or flirtatiousness. These qualities wear thin, however, as these individuals continually demand to be the center of attention. They commandeer the role of "the life of the party." If they are not the center of attention, they may do something dramatic (e.g., make up stories, create a scene) to draw the focus of attention to themselves. This need is often apparent in their behavior with a clinician (e.g., being flattering, bringing gifts, providing dramatic descriptions of physical and psychological symptoms that are replaced by new symptoms each visit).

The appearance and behavior of individuals with this disorder are often inappropriately sexually provocative or seductive (Criterion 2). This behavior not only is directed toward persons in whom the individual has a sexual or romantic interest but also occurs in a wide variety of social, occupational, and professional relationships beyond what is appropriate for the social context. Emotional expression may be shallow and rapidly shifting (Criterion 3). Individuals with this disorder consistently use physical appearance to draw attention to themselves (Criterion 4). They are overly concerned with impressing others by their appearance and expend an excessive amount of time, energy, and money on clothes and grooming. They may "fish for compliments" regarding appearance and may be easily and excessively upset by a critical comment about how they look or by a photograph that they regard as unflattering.

These individuals have a style of speech that is excessively impressionistic and lacking in detail (Criterion 5). Strong opinions are expressed with dramatic flair, but underlying reasons are usually vague and diffuse, without supporting facts and details. For example, an individual with histrionic personality disorder may comment that a certain individual is a wonderful human being, yet be unable to provide any specific examples of good qualities to support this opinion. Individuals with this disorder are characterized by self-dramatization, theatricality, and an exaggerated expression of emotion (Criterion 6). They may embarrass friends and acquaintances by an excessive public display of emotions (e.g., embracing casual acquaintances with excessive ardor, sobbing uncontrollably on minor

sentimental occasions, having temper tantrums). However, their emotions often seem to be turned on and off too quickly to be deeply felt, which may lead others to accuse the individual of faking these feelings.

Individuals with histrionic personality disorder have a high degree of suggestibility (Criterion 7). Their opinions and feelings are easily influenced by others and by current fads. They may be overly trusting, especially of strong authority figures whom they see as magically solving their problems. They have a tendency to play hunches and to adopt convictions quickly. Individuals with this disorder often consider relationships more intimate than they actually are, describing almost every acquaintance as "my dear, dear friend" or referring to physicians met only once or twice under professional circumstances by their first names (Criterion 8).

### **Associated Features Supporting Diagnosis**

Individuals with histrionic personality disorder may have difficulty achieving emotional intimacy in romantic or sexual relationships. Without being aware of it, they often act out a role (e.g., "victim" or "princess") in their relationships to others. They may seek to control their partner through emotional manipulation or seductiveness on one level, while displaying a marked dependency on them at another level. Individuals with this disorder often have impaired relationships with same-sex friends because their sexually provocative interpersonal style may seem a threat to their friends' relationships. These individuals may also alienate friends with demands for constant attention. They often become depressed and upset when they are not the center of attention. They may crave novelty, stimulation, and excitement and have a tendency to become bored with their usual routine. These individuals are often intolerant of, or frustrated by, situations that involve delayed gratification, and their actions are often directed at obtaining immediate satisfaction. Although they often initiate a job or project with great enthusiasm, their interest may lag quickly. Longer-term relationships may be neglected to make way for the excitement of new relationships.

The actual risk of suicide is not known, but clinical experience suggests that individuals with this disorder are at increased risk for suicidal gestures and threats to get attention and coerce better caregiving. Histrionic personality disorder has been associated with higher rates of somatic symptom disorder, conversion disorder (functional neurological symptom disorder), and major depressive disorder. Borderline, narcissistic, antisocial, and dependent personality disorders often co-occur.

### **Prevalence**

Data from the 2001–2002 National Epidemiologic Survey on Alcohol and Related Conditions suggest a prevalence of histrionic personality of 1.84%.

### **Culture-Related Diagnostic Issues**

Norms for interpersonal behavior, personal appearance, and emotional expressiveness vary widely across cultures, genders, and age groups. Before considering the various traits (e.g., emotionality, seductiveness, dramatic interpersonal style, novelty seeking, sociability, charm, impressionability, a tendency to somatization) to be evidence of histrionic personality disorder, it is important to evaluate whether they cause clinically significant impairment or distress.

### **Gender-Related Diagnostic Issues**

In clinical settings, this disorder has been diagnosed more frequently in females; however, the sex ratio is not significantly different from the sex ratio of females within the respective clinical setting. In contrast, some studies using structured assessments report similar prevalence rates among males and females.

## Differential Diagnosis

**Other personality disorders and personality traits.** Other personality disorders may be confused with histrionic personality disorder because they have certain features in common. It is therefore important to distinguish among these disorders based on differences in their characteristic features. However, if an individual has personality features that meet criteria for one or more personality disorders in addition to histrionic personality disorder, all can be diagnosed. Although borderline personality disorder can also be characterized by attention seeking, manipulative behavior, and rapidly shifting emotions, it is distinguished by self-destructiveness, angry disruptions in close relationships, and chronic feelings of deep emptiness and identity disturbance. Individuals with antisocial personality disorder and histrionic personality disorder share a tendency to be impulsive, superficial, excitement seeking, reckless, seductive, and manipulative, but persons with histrionic personality disorder tend to be more exaggerated in their emotions and do not characteristically engage in antisocial behaviors. Individuals with histrionic personality disorder are manipulative to gain nurturance, whereas those with antisocial personality disorder are manipulative to gain profit, power, or some other material gratification. Although individuals with narcissistic personality disorder also crave attention from others, they usually want praise for their "superiority," whereas individuals with histrionic personality disorder are willing to be viewed as fragile or dependent if this is instrumental in getting attention. Individuals with narcissistic personality disorder may exaggerate the intimacy of their relationships with other people, but they are more apt to emphasize the "VIP" status or wealth of their friends. In dependent personality disorder, the individual is excessively dependent on others for praise and guidance, but is without the flamboyant, exaggerated, emotional features of individuals with histrionic personality disorder.

Many individuals may display histrionic personality traits. Only when these traits are inflexible, maladaptive, and persisting and cause significant functional impairment or subjective distress do they constitute histrionic personality disorder.

**Personality change due to another medical condition.** Histrionic personality disorder must be distinguished from personality change due to another medical condition, in which the traits that emerge are attributable to the effects of another medical condition on the central nervous system.

**Substance use disorders.** The disorder must also be distinguished from symptoms that may develop in association with persistent substance use.

## Narcissistic Personality Disorder

### Diagnostic Criteria

**301.81 (F60.81)**

A pervasive pattern of grandiosity (in fantasy or behavior), need for admiration, and lack of empathy, beginning by early adulthood and present in a variety of contexts, as indicated by five (or more) of the following:

1. Has a grandiose sense of self-importance (e.g., exaggerates achievements and talents, expects to be recognized as superior without commensurate achievements).
2. Is preoccupied with fantasies of unlimited success, power, brilliance, beauty, or ideal love.
3. Believes that he or she is "special" and unique and can only be understood by, or should associate with, other special or high-status people (or institutions).
4. Requires excessive admiration.
5. Has a sense of entitlement (i.e., unreasonable expectations of especially favorable treatment or automatic compliance with his or her expectations).

**Exhibit “2”**

**Exhibit “2”**

## Differential Diagnosis

**Other personality disorders and personality traits.** Other personality disorders may be confused with histrionic personality disorder because they have certain features in common. It is therefore important to distinguish among these disorders based on differences in their characteristic features. However, if an individual has personality features that meet criteria for one or more personality disorders in addition to histrionic personality disorder, all can be diagnosed. Although borderline personality disorder can also be characterized by attention seeking, manipulative behavior, and rapidly shifting emotions, it is distinguished by self-destructiveness, angry disruptions in close relationships, and chronic feelings of deep emptiness and identity disturbance. Individuals with antisocial personality disorder and histrionic personality disorder share a tendency to be impulsive, superficial, excitement seeking, reckless, seductive, and manipulative, but persons with histrionic personality disorder tend to be more exaggerated in their emotions and do not characteristically engage in antisocial behaviors. Individuals with histrionic personality disorder are manipulative to gain nurturance, whereas those with antisocial personality disorder are manipulative to gain profit, power, or some other material gratification. Although individuals with narcissistic personality disorder also crave attention from others, they usually want praise for their "superiority," whereas individuals with histrionic personality disorder are willing to be viewed as fragile or dependent if this is instrumental in getting attention. Individuals with narcissistic personality disorder may exaggerate the intimacy of their relationships with other people, but they are more apt to emphasize the "VIP" status or wealth of their friends. In dependent personality disorder, the individual is excessively dependent on others for praise and guidance, but is without the flamboyant, exaggerated, emotional features of individuals with histrionic personality disorder.

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**Substance use disorders.** The disorder must also be distinguished from symptoms that may develop in association with persistent substance use.

## Narcissistic Personality Disorder

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### Diagnostic Criteria

301.81 (F60.81)

A pervasive pattern of grandiosity (in fantasy or behavior), need for admiration, and lack of empathy, beginning by early adulthood and present in a variety of contexts, as indicated by five (or more) of the following:

1. Has a grandiose sense of self-importance (e.g., exaggerates achievements and talents, expects to be recognized as superior without commensurate achievements).
2. Is preoccupied with fantasies of unlimited success, power, brilliance, beauty, or ideal love.
3. Believes that he or she is "special" and unique and can only be understood by, or should associate with, other special or high-status people (or institutions).
4. Requires excessive admiration.
5. Has a sense of entitlement (i.e., unreasonable expectations of especially favorable treatment or automatic compliance with his or her expectations).

6. Is interpersonally exploitative (i.e., takes advantage of others to achieve his or her own ends).
  7. Lacks empathy: Is unwilling to recognize or identify with the feelings and needs of others.
  8. Is often envious of others or believes that others are envious of him or her.
  9. Shows arrogant, haughty behaviors or attitudes.
- 

## Diagnostic Features

The essential feature of narcissistic personality disorder is a pervasive pattern of grandiosity, need for admiration, and lack of empathy that begins by early adulthood and is present in a variety of contexts.

Individuals with this disorder have a grandiose sense of self-importance (Criterion 1). They routinely overestimate their abilities and inflate their accomplishments, often appearing boastful and pretentious. They may blithely assume that others attribute the same value to their efforts and may be surprised when the praise they expect and feel they deserve is not forthcoming. Often implicit in the inflated judgments of their own accomplishments is an underestimation (devaluation) of the contributions of others. Individuals with narcissistic personality disorder are often preoccupied with fantasies of unlimited success, power, brilliance, beauty, or ideal love (Criterion 2). They may ruminate about "long overdue" admiration and privilege and compare themselves favorably with famous or privileged people.

Individuals with narcissistic personality disorder believe that they are superior, special, or unique and expect others to recognize them as such (Criterion 3). They may feel that they can only be understood by, and should only associate with, other people who are special or of high status and may attribute "unique," "perfect," or "gifted" qualities to those with whom they associate. Individuals with this disorder believe that their needs are special and beyond the ken of ordinary people. Their own self-esteem is enhanced (i.e., "mirrored") by the idealized value that they assign to those with whom they associate. They are likely to insist on having only the "top" person (doctor, lawyer, hairdresser, instructor) or being affiliated with the "best" institutions but may devalue the credentials of those who disappoint them.

Individuals with this disorder generally require excessive admiration (Criterion 4). Their self-esteem is almost invariably very fragile. They may be preoccupied with how well they are doing and how favorably they are regarded by others. This often takes the form of a need for constant attention and admiration. They may expect their arrival to be greeted with great fanfare and are astonished if others do not covet their possessions. They may constantly fish for compliments, often with great charm. A sense of entitlement is evident in these individuals' unreasonable expectation of especially favorable treatment (Criterion 5). They expect to be catered to and are puzzled or furious when this does not happen. For example, they may assume that they do not have to wait in line and that their priorities are so important that others should defer to them, and then get irritated when others fail to assist "in their very important work." This sense of entitlement, combined with a lack of sensitivity to the wants and needs of others, may result in the conscious or unwitting exploitation of others (Criterion 6). They expect to be given whatever they want or feel they need, no matter what it might mean to others. For example, these individuals may expect great dedication from others and may overwork them without regard for the impact on their lives. They tend to form friendships or romantic relationships only if the other person seems likely to advance their purposes or otherwise enhance their self-esteem. They often usurp special privileges and extra resources that they believe they deserve because they are so special.

Individuals with narcissistic personality disorder generally have a lack of empathy and have difficulty recognizing the desires, subjective experiences, and feelings of others (Criterion 7). They may assume that others are totally concerned about their welfare. They tend to discuss their own concerns in inappropriate and lengthy detail, while failing to recognize that others also have feelings and needs. They are often contemptuous and impatient with

others who talk about their own problems and concerns. These individuals may be oblivious to the hurt their remarks may inflict (e.g., exuberantly telling a former lover that "I am now in the relationship of a lifetime!"; boasting of health in front of someone who is sick). When recognized, the needs, desires, or feelings of others are likely to be viewed disparagingly as signs of weakness or vulnerability. Those who relate to individuals with narcissistic personality disorder typically find an emotional coldness and lack of reciprocal interest.

These individuals are often envious of others or believe that others are envious of them (Criterion 8). They may begrudge others their successes or possessions, feeling that they better deserve those achievements, admiration, or privileges. They may harshly devalue the contributions of others, particularly when those individuals have received acknowledgment or praise for their accomplishments. Arrogant, haughty behaviors characterize these individuals; they often display snobbish, disdainful, or patronizing attitudes (Criterion 9). For example, an individual with this disorder may complain about a clumsy waiter's "rudeness" or "stupidity" or conclude a medical evaluation with a condescending evaluation of the physician.

### **Associated Features Supporting Diagnosis**

Vulnerability in self-esteem makes individuals with narcissistic personality disorder very sensitive to "injury" from criticism or defeat. Although they may not show it outwardly, criticism may haunt these individuals and may leave them feeling humiliated, degraded, hollow, and empty. They may react with disdain, rage, or defiant counterattack. Such experiences often lead to social withdrawal or an appearance of humility that may mask and protect the grandiosity. Interpersonal relations are typically impaired because of problems derived from entitlement, the need for admiration, and the relative disregard for the sensitivities of others. Though overweening ambition and confidence may lead to high achievement, performance may be disrupted because of intolerance of criticism or defeat. Sometimes vocational functioning can be very low, reflecting an unwillingness to take a risk in competitive or other situations in which defeat is possible. Sustained feelings of shame or humiliation and the attendant self-criticism may be associated with social withdrawal, depressed mood, and persistent depressive disorder (dysthymia) or major depressive disorder. In contrast, sustained periods of grandiosity may be associated with a hypomanic mood. Narcissistic personality disorder is also associated with anorexia nervosa and substance use disorders (especially related to cocaine). Histrionic, borderline, antisocial, and paranoid personality disorders may be associated with narcissistic personality disorder.

### **Prevalence**

Prevalence estimates for narcissistic personality disorder, based on DSM-IV definitions, range from 0% to 6.2% in community samples.

### **Development and Course**

Narcissistic traits may be particularly common in adolescents and do not necessarily indicate that the individual will go on to have narcissistic personality disorder. Individuals with narcissistic personality disorder may have special difficulties adjusting to the onset of physical and occupational limitations that are inherent in the aging process.

### **Gender-Related Diagnostic Issues**

Of those diagnosed with narcissistic personality disorder, 50%-75% are male.

### **Differential Diagnosis**

Other personality disorders and personality traits. Other personality disorders may be confused with narcissistic personality disorder because they have certain features in



# Exhibit “3”

# Exhibit “3”

### Exhibit "3"

Statements by Alleged Incapacitated Person ("AIP") constituting factual information pursuant to paragraph 2 of the PETITION TO DETERMINE INCAPACITY;

1. "Yeah, I guess so." AIP statement when asked if he supported the Iraq war in 2002 with interview with Howard Stern (September 11, 2002); AIP later claimed that he opposed it back then.
2. "What do you have to lose by trying something new like Trump? What do you have to lose? You're living in poverty; your schools are no good; you have no jobs; 58 percent of your youth is unemployed. What the hell do you have to lose?" [AIP making a pitch trying to win over African American voters.] "At the end of four years, I guarantee you that I will get 95 percent of the African-American vote." (August 19, 2016).
3. "I might lie to you like Hillary does all the time, but I'll never lie to Giacomo, okay?" [AIP admitting to lying to voters, but saying he would not lie to 18-year old cancer patient Giacomo Brancado.] (August 13, 2016).
4. "If she [Hillary Clinton] gets to pick her judges – nothing you can do folks. Although, the Second Amendment people. Maybe there is. I don't know." [AIP stating what some interpreted to be a suggestion that someone might shoot Hillary Clinton, her Supreme Court picks, or both.] (August 9, 2016).
5. "Why can't we use nuclear weapons?"
6. "I always wanted to get the Purple Heart. This was much easier." [AIP statement on receiving a Purple Heart from a supporter.] (August 2, 2016).
7. "[Vladimir Putin] is not going into Ukraine, OK, just so you understand. He's not gonna go into Ukraine, all right? You can mark it down. You can put it down." [AIP apparently unaware that Russia had already annexed Crimea in 2014.] (July 31, 2016).
8. "I think I've made a lot of sacrifices. I work very, very hard." [AIP rejecting the assertion made by Muslim lawyer Khizr Kahn (whose son died in Iraq in 2004) that AIP had "sacrificed nothing and no one."] (July 30, 2016).
9. "I've had a beautiful, I've had a flawless campaign. You'll be writing books about this campaign." (July 29, 2016).
10. "You know what I wanted to. I wanted to hit a couple of those speakers so hard. I would have hit them. No, no. I was going to hit them, I was all set and then I got a call from a highly respected governor. . . ." [AIP referring to speakers at the Democratic National Convention.] (July 29, 2016).

11. "Russia, if you're listening, I hope you're able to find the 30,000 emails that are missing. I think you will probably be rewarded mightily by our press." (July 27, 2016).
12. "I alone can fix it." (July 21, 2016).
13. "I don't care. It's a long time ago. And he voted that way and they were also misled. A lot of information was given to people. . . ." [AIP forgiving running mate Pence for voting in favor of the Iraq war, but not Hillary Clinton.]
14. "I think I am, actually humble. I think I'm much more humble than you would understand." (July 17, 2016).
15. "The LGBT community, the gay community, the lesbian community—they are so much in favor of what I've been saying over the last three or four days. Ask the gays what they think and what they do, in, not only Saudi Arabia, but many of these countries, and then you tell me—who's your friend, Donald Trump or Hillary Clinton?" (June 15, 2016).
16. "Appreciate the congrats for being right on radical Islamic terrorism, I don't want congrats, I want toughness & vigilance. We must be smart!" (June 12, 2016).
17. "How about bringing baskets of money into Iraq? I want to know—who were the soldiers who had that job? I want to know who were the soldiers that had that job, 'cause I think they're living well right now, whoever they may be." (June 14, 2016).
18. "I've been treated very unfairly by this judge. Now, this judge is of Mexican heritage. I'm building a wall, OK? I'm building a wall." (June 5, 2016).
19. "From a moral standpoint, I believe in it. But you also have to get elected. And there's no way a Republican is going to beat a Democrat when the Republican is saying, 'We're going to cut your Social Security and the Democrat is saying, 'We're going to keep it and give you more.'" (May 26, 2016).
20. "His father [Ted Cruz's father] was with Lee Harvey Oswald prior to Oswald's being—you know, shot. I mean, the whole thing is ridiculous. What is this, right prior to his being shot, and nobody even brings it up. They don't even talk about that. That was reported, and

nobody talks about it.” (May 3, 2016).

21. “I wrote this out, and it’s very close to my heart. Because I was down there and I watched our police and our firemen down at 7/11, down at the World Trade Center right after it came down. And I saw the greatest people I’ve ever seen in action.” (April 18, 2016).
22. “There has to be some form of punishment [for women who have abortions] . . . you go back to a position like they had when they would perhaps go to illegal places, but we have to ban it.” (March 30, 2016).
23. “Who knows?” [AIP response when asked if he would start a war with China.] (March 25, 2016).
24. “What do I know about it? All I know is what’s on the internet.” (March 13, 2016).
25. “He [Marco Rubio] referred to my hands, if they’re small, something else must be small. I guarantee you there’s no problem. I guarantee it.” (March 3, 2016).
26. “Just so you understand, I don’t know anything about David Duke, OK? I don’t know anything about what you’re even talking about with white supremacy or white supremacists. So I don’t know. I don’t know—did he endorse me, or what’s going on? Because I know nothing about David Duke; I know nothing about white supremacists.” (February 28, 2016).
27. “It is better to live one day as a lion than 100 years as a sheep.” AIP quoting fascist Italian dictator Mussolini. (February 28, 2016).
28. “I love the old days, you know? You know what I hate? There’s a guy totally disruptive, throwing punches, we’re not allowed to punch back anymore. . . . I’d like to punch him in the face, I’ll tell ya.” (February 22, 2016).
29. “There may be somebody with tomatoes in the audience. If you see somebody getting ready to throw a tomato, knock the crap out of them, would you? Seriously. Okay? Just knock the hell—I promise you, I will pay for the legal fees.” (February 1, 2016).
30. “For a religious leader to question a person’s faith is disgraceful. I am proud to be a Christian. . . . If and when the Vatican is attacked by ISIS, which as everyone knows is ISIS’ ultimate trophy, I can promise you that the Pope would have only wished and prayed that

Donald Trump would have been President because this would not have happened.”  
(February 18, 2016).

31. “I could stand in the middle of Fifth Avenue and shoot somebody, and I wouldn’t lose any voters, okay? It’s, like, incredible.” (January 23, 2016).
32. “I know more about ISIS than the generals do, believe me. . . . I would bomb the shit out of them.” (November 13, 2015).
33. “Donald J. Trump is calling for a total and complete shutdown of Muslims entering the United States until our country’s representatives can figure out what the hell is going on.”
34. “You could see there was blood coming out of her eyes. Blood coming out of her wherever.” [AIP referencing Fox News anchor Megyn Kelly].
35. “When Mexico sends its people, they’re not sending their best. They’re sending people that have lots of problems . . . they’re bringing drugs, they’re bring crime. They’re rapists.”
36. “If Hillary Clinton can’t satisfy her husband what makes her think she can satisfy America?”
37. “I don’t think Ivanka would do that, although she does have a very nice figure. I’ve said if Ivanka weren’t my daughter, perhaps I’d be dating her.”
38. “Look at that face! [referring to Carly Fiorina] Would anyone vote for that? Can you imagine that, the face of our next president I mean, she’s a woman, and I’m not s’posedta say bad things, but really, folks, come on. Are we serious?”
39. “A person who is very flat chested is very hard to be a 10.”
40. “Women. You have to treat them like shit.”
41. “The beauty of me is that I’m very rich.”
42. “I’m speaking with myself, number one, because I have a very good brain and I’ve said a lot of things.”
43. “I think Islam hates us.”

44. "He's not a war hero [John McCain]. He's a war hero because he was captured. I like people that weren't captured."
45. "If I were running 'The View,' I'd fire Rosie [O'Donnell]. I mean, I'd look her right in that fat, ugly face of hers, I'd say, 'Rosie, you're fired.'"
46. "I like kids. I mean, I won't do anything to take care of them. I'll supply funds, and she'll take care of the kids."
47. "I know where she went—it's disgusting. I don't want to talk about it. No, it's too disgusting. Don't say it, it's disgusting." [AIP on Hillary Clinton taking a bathroom break during a Democratic debate.]
48. "Now, the poor guy—you've got to see this guy, 'Ah, I don't know what I said! I don't remember!'" [AIP mocking New York Times investigative reporter Serge Kovaleski, who has arthrogryposis].
49. "There were people that were cheering on the other side of New Jersey, where you have large Arab populations. They were cheering as the World Trade Center came down."
50. "The other thing with the terrorists is you have to take out their families, when you get these terrorists, you have to take out their families. They care about their lives, don't kid yourself. When they say they don't care about their lives, you have to take out their families." (December 2, 2015).
51. "I will build a great wall—and nobody builds walls better than me, believe me—and I'll build them very inexpensively. I will build a great, great wall on our southern border, and I will make Mexico pay for that wall. Mark my words."
52. "I've seen numbers of 24 percent—I actually saw a number of 42 percent unemployment. Forty-two percent. 5.3 percent unemployment—that is the biggest joke there is in this country. . . . The unemployment rate is probably 20 percent, but I will tell you, you have some great economists that will tell you it's a 30, 32. And the highest I've heard so far is 42 percent." (September 28, 2015).
53. "I don't think I've made mistakes. Every time somebody said I made a mistake, they do the

- polls and my numbers go up, so I guess I haven't made any mistakes.”
54. “These are stupid people that say, ‘Oh didn't Trump declare bankruptcy? Didn't he go bankrupt?’ I didn't go bankrupt.”
55. “I will be the greatest jobs president that God ever created.”
56. “We're gonna bring business back. We're gonna have businesses that used to be in New Hampshire, that are now in Mexico, come back to New Hampshire, and you can tell them to go fuck themselves. Because they let you down, and they left!”
57. “We're going to knock the shit out of ISIS.”
58. “These people—I'd like to use really foul language. I won't do it. I was going to say they're really full of shit, but I won't say that.”
59. “All the women on ‘The Apprentice’ flirted with me—consciously or unconsciously. That's to be expected.”
60. “When was the last time anybody saw us beating, let's say, China in a trade deal? They kill us. I beat China all the time.”
61. “Free trade is terrible. Free trade can be wonderful if you have smart people. But we have stupid people.”
62. “I have a great relationship with the blacks.”
63. “I sort of hope that [housing-market collapse] happens because them people like me would go in and buy. If there is a bubble burst, as they call it, you know you could make a lot of money.”
64. “My entire life, I've watched politicians bragging about how poor they are, how they came from nothing, how poor their parents and grandparents were. And I said to myself, if they stay so poor for so many generations, maybe this isn't the kind of person we want to be electing to higher office. How smart can they be? They're morons.”
65. “I have people that have been studying [Obama's birth certificate] and they cannot believe

what they're finding. . . . I would like to have him show his birth certificate, and can I be honest with you, I hope he can. Because if he can't, if he can't, if he wasn't born in this country, which is a real possibility . . . then he has pulled one of the greatest cons in the history of politics."

66. "I get along with the middle class and the poor people better than I get along with the rich people."
67. "My fingers are long and beautiful, as, it has been well been documented, are various other parts of my body."
68. "I'm not a schmuck. Even if the world goes to hell in a handbasket, I won't lose a penny."
69. "Let me tell you, I am a really smart guy."
70. "Sorry losers and haters, but my I.Q. is one of the highest—and you all know it! Please don't feel so stupid or insecure, it's not your fault."
71. "40 Wall Street [AIP's building] actually was the second-tallest building in downtown Manhattan . . . . And now it's the tallest." [AIP on September 11, 2001, referring to the attack on the World Trade Center].
72. "When Iran, when they circled our beautiful destroyers with their little boats, and they make gestures at our people that they shouldn't be allowed to make, they will be shot out of the water." (September 9, 2016).
73. "Dwyane Wade's [sic] cousin was just shot and killed walking her baby in Chicago. Just what I have been saying. African-Americans will VOTE TRUMP!"
74. "You know, it really doesn't matter what [the media] write as long as you've got a young and beautiful piece of ass."
75. "I think the only difference between me and the other candidates is that I'm more honest and my women are more beautiful."
76. "I think apologizing's a great thing, but you have to be wrong. I will absolutely apologize, sometime in the hopefully distant future, if I'm ever wrong."



77. "The line of 'Make America great again,' the phrase, that was mine, I came up with it about a year ago, and I kept using it, and everybody's using it, they are all loving it. I don't know I guess I should copyright it, maybe I have copyrighted it."
78. "The Mexican government is much smarter, much sharper, much more cunning. And they send the bad ones over because they don't want to pay for them. They don't want to take care of them."
79. "Jeb Bush has to like the Mexican illegals because of his wife."
80. "Sadly, the overwhelming amount of violent crime in our major cities is committed by blacks and Hispanics—a tough subject—must be discussed."
81. "The concept of global warming was created by and for the Chinese in order to make U.S. manufacturing non-competitive."
82. "Listen you motherfuckers, we're going to tax you 25 percent!" [AIP on exporting goods to China].
83. "I'm really good at war."
84. "President Barack Obama was born in the United States. Period."
85. "Torture works. OK, folks? You know, I have these guys—'Torture doesn't work!'—believe me, it works. And waterboarding is your minor form. Some people say it's not actually torture. Let's assume it is. But they asked me the question, What do you think of waterboarding? Absolutely fine. But we should go much stronger than waterboarding."
86. "... whether you like Saddam Hussein or not, he used to kill terrorists."
87. "They won't refuse. They're not going to refuse me. Believe me." [AIP stating that the U.S. military will carry out his illegal orders].
88. "It's in the book that he's [Ben Carson] got a pathological temper" . . . . "That's a big problem because you don't cure that . . . as an example: child molesting. You don't cure these people. You don't cure a child molester. There's no cure for it. Pathological, there's

no cure for that.”

89. “The sheriff’s badge—which is available under Microsoft’s ‘shapes’—fit with the theme of corrupt Hillary and that is why I selected it.” [AIP statement regarding meme created by white supremacists, found on neo-Nazi forum more than a week before].
90. “26,000 unreported sexual assaults in the military-only 238 convictions. What did these geniuses expect when they put men & women together?”
91. “It’s certainly not groundbreaking news that the early victories by the women on ‘The Apprentice’ were, to a very large extent, dependent on their sex appeal.”
92. “Like you wouldn’t have your job if you weren’t beautiful.” [AIP statement to a female reporter].
93. “You’re disgusting, you’re disgusting.” [AIP statement to Attorney Elizabeth Beck who asked for a break to pump breastmilk for her infant daughter].
94. “Women have one of the great acts of all time. The smart ones act very feminine and needy, but inside they are real killers. The person who came up with the expression ‘the weaker sex’ was either very naïve or had to be kidding. I have seen women manipulate men with just a twitch of their eye—or perhaps another body part.”
95. “Women find his power almost as much of a turn-on as his money.” [AIP speaking about himself].
96. “ISIS is honoring President Obama. He is the founder of ISIS, he is the founder of ISIS, OK? He’s the founder.”
97. “And I would say the co-founder would be crooked Hillary Clinton. Co-founder. Crooked Hillary Clinton.”
98. “I would say they could be tried there, that would be fine.” [AIP saying he could support the idea of trying American citizens accused of terrorism in military tribunals at Guantanamo Bay, which is illegal].
99. “I’m telling you, November 8, we better be careful, because the election is going to be

rigged.”

100 “When we got out we should have taken the oil.”

101 “Our military is a disaster.”

102 “So one of the primary reasons I chose Mike was I looked at Indiana, and I won Indiana big.”

103 “My rallies are not covered properly by the media. They never discuss the real message and never show crowd size or enthusiasm.”

104 “As usual, Hillary & the Dems are trying to rig the debates so 2 are up against major NFL games.”

105 “An analysis showed that Bernie Sanders would have won the Democratic nomination if it were not for the Super Delegates.”

106 Hillary Clinton “wants to essentially abolish the Second Amendment.”

107 “I recommended Ohio” [AIP on picking a convention city].

108 “We don’t know anything about Hillary in terms of religion. Now, she’s been in the public eye for years and years, and yet there’s no—there’s nothing out there.”

109 Benghazi victims were “left helpless to die as Hillary Clinton soundly slept in her bed.”

110 “The Obama administration was actively supporting Al Qaeda in Iraq, the terrorist group that became the Islamic State.”

111 “Crime is rising.”

112 Hillary Clinton’s agenda is to “release the violent criminals from jail. She wants them all released.”

113 “ISIS is making millions of dollars a week selling Libyan oil.”

- 114 "My numbers are better right now than Ronald Reagan's numbers were with Jimmy Carter."
- 115 "Out of 67 counties [in Florida] I won 66, which is unprecedented. It's never happened before."
- 116 "GDP was zero essentially for the last two quarters."
- 117 "We (Trump University) have an 'A' from the Better Business Bureau."
- 118 AIP said that in the Philippines more than 100 years ago, General John Pershing "took 50 bullets, and he dipped them in pigs' blood" and shot 49 Muslim rebels. "The 50<sup>th</sup> person, he said, 'You go back to your people, and you tell them what happened.' And for 25 years, there wasn't a problem."
- 119 AIP said that Canadian-born Ted Cruz "has had a double passport."
- 120 "Sixty-one percent of our bridges are in trouble."
- 121 "If Israel attacks Iran . . . we're supposed to be on Iran's side."
- 122 AIP said that the number of illegal immigrants in the United States is "30 million, it could be 34 million."
- 123 AIP said that Senator John McCain "has done nothing to help the vets."
- 124 AIP says his book, *The Art of the Deal*, is "the No. 1 selling business book of all time."
- 125 "Even our nuclear arsenal doesn't work. It came out recently they have equipment that is 30 years old. They don't know if it worked."
- 126 "The last quarter, it was just announced, our gross domestic product . . . was below zero. Who ever heard of this? It's never below zero."
- 127 "Maybe they [Japan] would be better off [in defending themselves against North Korea]—including with nukes, yes, including with nukes."
- 128 "But if you had guns in that room [Orlando], even if you had a number of people having

them strapped to their ankle or strapped to their waists, where bullets could have flown in the other direction, you wouldn't have had the same kind of tragedy.”

- 129 “I have the world’s greatest memory.”
- 130 “I do have a relationship” [with Vladimir Putin], and I can tell you that he’s very interested in what we’re doing here today. He’s probably very interested in what you and I am saying today, and I’m sure he’s going to be seeing it in some form.” [2013]
- 131 “I spoke, indirectly and directly, with President Putin.” [2014]
- 132 “I got to know him [Vladimir Putin] very well because we were both on 60 Minutes. We were stablemates, and we did very well that night.” [2015]
- 133 “No, just so you understand, he [Vladimir Putin] said very nice things about me, but I have no relationship with him. I don’t—I’ve never met him . . . I have no relationship with Putin. I don’t think I’ve ever met him. I never met him . . .” [2016]
- 134 “Now we should go in [to Libya], we should stop this guy [Muammar Gaddafi], which would be very easy and very quick. . . .”
- 135 “I am the least racist person that you’ve ever looked at—believe me.”
- 136 “She’s a woman [Senator Elizabeth Warren] that has been very ineffective other than she’s got a big mouth.”
- 137 “I find it offense that Goofy Elizabeth Warren, sometimes referred to as Pocahontas, pretended to be Native American to get in Harvard.”
- 138 “If they fulfill their obligations to us, the answer is yes.” [AIP answer to question as to whether he would come to the aid of NATO allies if attacked by Russia].
- 139 “I want to be unpredictable.”
- 140 “Like in San Bernardino. People saw bombs all over these people’s floors. They had bombs all over the floor. People saw it.”

- 141 "As far as Atlantic City, for years and years I had success."
- 142 "I understand that crooked Hillary was talking about making products in other countries that I have where I have very successful companies doing this. That's because they don't even make them in this country."
- 143 "They drowned people in steel cages by the thousands."
- 144 "I got a letter from the NFL saying, 'This is ridiculous. Why are the debates against\_\_\_.'"
- 145 "I know the constitution very well."
- 146 "Look, I think it was rigged a little bit for me and we won in landslides. I think it was rigged against Bernie Sanders with this Super Delegates nonsense."
- 147 "You come from Syria—if you're Muslim, it's one of the easiest places to come into the United States from, if you're Christian, it's impossible, virtually impossible to come into the United States."
- 148 "Mexico is booming."
- 149 "Our military is totally depleted, totally depleted."
- 150 "It's amazing how often I am right?"
- 151 "Winning so much we will get tired of winning. . . ."
- 152 ". . . lots of people are saying . . . ."
- 153 "She's the devil." [AIP referring to Hillary Clinton].
- 154 "I get along with everyone."
- 155 "Nobody's more conservative than me on energy independence."
- 156 "Nobody's more conservative than me on the military."

- 157 "Nobody's more conservative than me on taking care of our great veterans."
- 158 "Nobody has more respect for women than I do."
- 159 "There's nobody more pro-Israel than I am."
- 160 "There's nobody that's done so much for equality as I have."
- 161 "I would be the best for women, I would be the best for women's health issues."
- 162 "Nobody knows more about taxes than I do, maybe in the history of the world."
- 163 "Nobody's ever been more successful than me. I'm the most successful person ever to run."
- 164 "Nobody knows debt better than me."
- 165 "There's nobody bigger or better at the military than I am."
- 166 "I will help the veterans like no one else."
- 167 "Nobody knows the system better than me."
- 168 "Nobody builds better walls than me."
- 169 "Nobody knows more about trade than me."
- 170 "No one has done more for people with disabilities than me."
- 171 "Nobody knows jobs like I do."
- 172 "I would say more Presidential, and I've said this a couple of times, more Presidential than anybody other than the great Abe Lincoln."
- 173 "Nobody reads the Bible more than me."
- 174 "[Arianna Huffington] is unattractive both inside and out. I fully understand why her former husband left her for a man—he made a good decision."

- 175 "People like me across the board. Everybody likes me."
176. "I know what sells and I know what people want."
177. "I have black guys counting my money. . . . I hate it. The only guys I want counting my money are short guys that wear yarmulkes all day."
- 178 "I don't have a racist bone in my body."
- 179 "You have to treat 'em [women] like shit."
- 180 "It's very possible that I could be the first presidential candidate to run and make money on it."
- 181 "Well, if I ever ran for office, I'd do better as a Democrat than as a Republican—and that's not because I'd be more liberal, because I'm conservative. But the working guy would elect me. He likes me."
- 182 "When you need zone changes, you're political. . . . You know, I'll support the Democrats, the Republicans, whatever the hell I have to support."
- 183 "I will tell you that our system is broken. I gave to many people. Before this, before two months ago, I was a businessman. I give to everybody. When they call, I give. And do you know what? When I need something from them two years later, three years later, I call them—they are there for me."
- 184 "How much have I made off the casinos? Off the record, a lot."
- 185 "I'll do what I have to do."
- 186 "I do whine because I want to win, and I'm not happy about not winning, and I am a whiner, and I keep whining and whining until I win."
- 187 "I do things by instinct."
- 188 "Angelina Jolie is sort of amazing because everyone thinks she's like this great beauty. And



I'm not saying she's an unattractive woman, but she's not a beauty, by any stretch of the imagination. I really understand beauty."

189 "Karl Rove is a total loser."

190 [Republic pollster Frank Luntz] is a "total loser."

191 [George Will] is a "moron."

192 [Chuck Todd] is a "moron."

193 [Former Secretary of Defense Chuck Hagel] is an "obvious moron."

194 "What a stiff, what a stiff, Lindsey Graham."

195 "... of course, it's very hard for them to attack me on looks, because I'm so good looking."

196 "Who knows what's in the deepest part of my mind?"

197 "It's all in the hunt and once you get it, it loses some of its energy. I think competitive, successful men feel that way about women. Don't you agree? Really, don't you agree?"

198 "I don't sleep more than four hours a night."

199 "I'm a guy who lies awake at night and thinks and plots."

200 "Laziness is a trait in blacks."

# Over 700 Christian Women Condemn Trump's Abusive Remarks

As Christian women we are appalled by Republican presidential nominee Donald Trump's recorded remarks that disparage women and condone sexual assault. Such language cannot be dismissed as "locker room talk." Mr. Trump must offer public contrition that fully acknowledges the seriousness and depravity of his actions.

The sin of misogyny has caused many of us to experience sexual assault or sexually abusive language that threatened our safety, dignity and well-being.

Christian leaders cannot condone such violent speech about women as a minor mistake or an innocent attempt to be "macho." These excuses teach our young people that such language is acceptable and do further harm to those who have been abused.

We urge all religious leaders to preach, teach and help their communities heal from the twin sins of sexual violence and misogyny. While we are disheartened by Mr. Trump's toxic words, we believe this moment presents an opportunity to teach our daughters and sons that they are loved, and to teach all Americans how to speak out against sexually violent language.

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Rev. Linda Higgins  
St John's UCC  
Richmond, VA  
United Church of Christ

Rev. Sherman Logan  
First Unitarian Universalist Church of Richmond  
Richmond, VA  
Unitarian Universalist

The Rev. Elaine Ellis Thomas  
St. Paul's Memorial Episcopal Church  
Charlottesville, VA  
Episcopal

Rev. Holly Hoppe  
Presbyterian  
Pflugerville, TX  
Christian

Rev. Lynne Clements  
Westminster Presbyterian Church  
Charlottesville, VA  
PC(USA)

Rev. Robin Anderson  
Commonwealth Baptist Church  
Alexandria, VA  
Baptist

Rev. Natalie Kline  
Chaplain at Rescue Mission  
Roanoke, VA  
Cooperative Baptist

Rev. Cynthia Crowner  
Retired  
Stroudsburg, PA  
Presbyterian (Christian)

Phyllis Kline  
Interfaith Chaplain  
Longmont, CO  
Interfaith

Rev. Amelia Richardson Dress  
UCC Longmont  
Erie, CO  
Christian



Rev. Miryam Hammond  
Retired  
Longmont, CO  
UCC

Rev. Jane Vennard  
United Church of Christ  
Denver, CO  
Progressive Christian

Rev. Cynthia Bumb  
Emmaus Homes  
St. Charles, MO  
United Church of Christ

Kathy Escobar  
The Refuge  
Arvada, CO  
Non-denominational Christian

Rev. E. Marie Gasau  
United Methodist Church (Ret.)  
Oak Creek, CO  
Interfaith activism

Rev. Clover Beal  
Montview Boulevard Presb Church  
Denver, CO  
PC (USA)

Rev. Anne Dunlap  
United Church of Montbello  
Denver, CO  
UCC

Rev. Kimberly Salico-Diehl  
Plymouth Congregational Church  
Fort Collins, CO  
American Baptist

Rev. Lucille Fritz  
Huntington Congregational UCC  
Shelton, CT  
United Church of Christ

Rev. Mimi Savudge  
Grace Episcopal  
Liberty, MO  
Episcopal

Morgan Caruthers  
Calvary Baptist Church of Denver  
Denver, CO  
Alliance of Baptists

Rev. Emily McGinley  
Urban Village Church  
Chicago, IL  
Presbyterian Church (U.S.A.)

Rev. Susan Buchanan  
Westbury United Methodist Church  
Houston, TX  
United Methodist

Sylvia Thorson-Smith  
Member, Advisory Committee on Social Witness Policy  
St. Mark's Presbyterian  
Tucson, AZ  
Presbyterian Church (U.S.A.)

Rev. Christiane Heyde  
Mountain Vista UU  
Tucson, AZ  
Unitarian Universalist

Rev. Iris Coover  
United Church of Christ  
Fredonia, AZ  
United Church of Christ

Rev. Sarah Trone Garriott  
Faith Lutheran Church  
Clive, IA  
Evangelical Lutheran Church in America

Rev. Delle McCormick  
Rincon Congregational United Church of Christ  
Tucson, AZ  
United Church of Christ

Rev. Julia Rendon  
Crossroads United Church of Christ  
Indianola, IA  
UCC

Rev. Ruth Costello  
Community Church of Fontana, United Church of Christ  
Fontana, WI  
United Church of Christ

Rev. Ann Pittman  
First Baptist Church of Austin, Texas  
Austin, TX  
Christian/Baptist

Rev. Taylor Burgoyne  
Eastside Covenant Church  
Tucson, AZ  
Evangelical Covenant Church

The Rev. Susan Mills  
The Episcopal Church  
Indianapolis, IN  
Episcopalian

Rev. Susan Andrews  
Second Presbyterian Church  
St. Louis, MO  
Presbyterian Church USA

Rev. Jeanne Lischer  
Immanuels UCC & St. John's UCC  
Marthasville, MO  
United Church of Christ

Sister Mary Dostal  
Billings, MT  
Roman Catholic

Chaplain Julie Hawker  
Mt. Tabor UCC  
St. Louis, MO  
United Church of Christ

Emilie O'Brien  
Youth coordinator  
Miami Beach Community Church  
Miami Beach, FL  
Christian

Chaplain of the College Siri Erickson  
Gustavus Adolphus College  
St. Peter, MN  
ELCA - Lutheran

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Children's Minister  
Forest Hills United Methodist Church  
Brentwood, TN  
United Methodist

Minister Shavonne Williams  
Christ Fellowship Church  
Martinez, GA  
Protestant

Minister Sonya Vann  
Christ the King United Church of Christ  
Florissant, MO  
Christian

Pastor Jane C. Johnson  
First Presbyterian Church  
Smithville, TX  
Presbyterian Church (USA)

Rev. Leah Robberts-Mosser  
Community United Church of Christ  
Champaign, IL  
United Church of Christ

Rev. Devita Parnell  
Cooperative Baptist Fellowship  
Decatur, GA  
Cooperative Baptist

Rev. Lorna Kuyk  
Honorably Retired  
Albuquerque, NM  
Presbyterian Church (U.S.A)

Rev. Margot Willis  
Retired  
Bridgeport, WV  
United Church of Christ

Rev. Ruth Perkins Lee  
Cooperative Baptist Fellowship  
Decatur, GA  
Baptist

Rev. Tere Canzoneri  
Oakhurst Baptist Church  
Decatur, GA  
Baptist

Rev. Rebecca Caswell-Speight  
Smoke Rise Baptist Church  
Snellville, GA  
Baptist

Rev. Melanie Stanley-Soulen  
United Methodist Church  
Jackson, GA  
Christian

Rev. Leah Lonsbury  
Oakhurst Baptist Church  
Decatur, GA  
Baptist

Rev. Jessica Petersen  
Congregational United Church of Christ  
Newton, IA  
Christian

Rev. KT Ockels  
Beechmont Presbyterian  
Louisville, KY  
Presbyterian

Rev. Carla Gilbert  
Church of Christ Union  
Berea, KY  
United Church of Christ

Rev. Leslie Moughty  
First Congregational UCC of Brainerd Minnesota  
Brainerd, MN  
United Church of Christ

Rev. Desiree Hartson Gold  
United Church of Christ  
South St. Paul, MN  
United Church of Christ

Rev. Erin Racine  
West End United Methodist Church  
Nashville, TN  
United Methodist

Rev. Erika Sanborne  
UCC  
Minneapolis, MN

United Church of Christ

Rev. Sue Hanly  
Faith United Church of Christ  
International Falls, MN  
UCC / Christian

Rev. Cheryl Harrison-Davidson  
First United Methodist  
North Myrtle Beach, SC  
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Rev. Kathleen Davies  
A Community of the Servant Savior Presbyterian Church  
Houston, TX  
Presbyterian/Christian

Rev. Kathy Manis Findley  
New Millenium Church  
Macon, GA  
Baptist

Rev. Dr. Pam Durso  
Executive Director, Baptist Women in Ministry  
Atlanta, GA  
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Rev. Dr. Richard Short  
Retired  
Roswell, GA  
PCUSA

Rev. Dr. Beverlee Bell  
Walnut Hills United Methodist Church  
Urbandale, IA  
Christian

Rev. Dr. Anita L. Bradshaw  
Mayflower United Church of Christ  
Minneapolis, MN  
United Church of Christ

Rev. Dr. Rebecca Voelkel

Lyndale United Church of Christ  
Minneapolis, MN  
Christian- United Church of Christ

Rev. Ashley Harness  
Lyndale United Church of Christ  
Minneapolis, MN  
United Church of Christ

Rev. Robin White  
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Mathias, WV  
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The Rev. Canon Peg Chamberlin  
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Rochester, MN  
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Pastor Lisa Watson-Hill  
NRS Tri-Parish  
Mondovi, WI  
ELCA Lutheran

Rev. Dr. Bobbie McGarey  
New Life PCUSA

Albuquerque, NM  
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Mennonite

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Presbyterian Church (USA)

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Lewistown, MT  
Episcopalian

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Missoula, MT  
United Church of Christ

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Milledgeville, GA  
Presbyterian Church (USA)

Director of Children and Families Elspeth Allen Glaubitz  
Tyler Street Church  
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St. Martin's Episcopal Church  
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Episcopalian

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Central Presbyterian Church  
Austin, TX  
PCUSA

Pastor Stephanie Mathis  
West Hills Covenant Church  
Portland, OR  
Evangelical Covenant Church

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Dallas, TX  
Disciples of Christ

Executive Minister Brenda Lynn Kneece  
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Baptist

Interfaith Minister Christine Morgan  
Chaplaincy Institute Interfaith Communittee  
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Interfaith

Pastor Jennifer Hamlin-Navias  
First Unitarian Universalist Society of Syracuse

Syracuse, NY  
UU/UCC

Pastor Kirsten Moore  
Calvary Lutheran Church  
Rio Linda, CA  
Evangelical Lutheran Church in America

Pastor Dawn Marie Turner  
First Christian Church of Idaho Falls  
Idaho Falls, ID  
Christian Church (Disciples of Christ)

Pastor Renee Goodwin  
First Christian Church of Kinsley, KS  
Kinsley, KS  
Christian Church (Disciples of Christ)

Pastor Charlotte Sommers  
Northminster Presbyterian Church  
Troy, MI  
PCUSA

Pastor Julie Anderson  
First Covenant Church  
Jamestown, NY  
Evangelical Covenant Church

Pastor Johanna Rehbaum  
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East Amherst, NY  
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Fox Island United Church of Christ  
Fox Island, WA  
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Interfaith

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Christ House  
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Rev. Nancy W Carle  
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Rev. Cynthia Reynolds  
United Church of Christ  
Bloomfield, NJ

United Church of Christ

Rev. Kellie Picallo  
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Christian -Presbyterian

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Diamond Bar United Church of Christ  
Diamond Bar, CA  
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Rev. Dr. Diana Holbert  
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Welcome the Spirit Coaching and Consulting

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First Trinity Lutheran Church  
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ELCA

Rev. Mary Louise Allen  
St. Martha's Episcopal Church  
Bethany Beach, DE  
Episcopal

Rev. Cheryl Thomas  
Under Eagles Wings  
Des Moines, IA  
American Baptist

Rev. Debbie Sperry  
Moscow First UMC  
Moscow, ID  
United Methodist

Rev. Sarah Garcia  
St. Pauls UCC Chicago  
Chicago, IL  
Christian Protestant

Rev. Laura Phillips  
Overland Park Christian Church (DOC)  
Overland Park, KS  
Christian Church (Disciples of Christ)

Rev. Donna Rose-Heim  
Christian Church (Disciples of Christ)  
Overland Park, KS  
Christian Church (Disciples of Christ)

Rev. Loretta Ross  
The Sanctuary Foundation for Prayer  
Topeka, KS  
Presbyterian (USA)

Rev. Jean Murphy  
Heartland Presbytery  
Shawnee, KS  
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Rev. Susan Youmans  
First United Methodist Church  
Warren, MI  
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Rev. Lori Carey  
Trinity Lutheran Church  
Ann Arbor, MI  
ELCA

Rev. Kama Jongerius  
Third Reformed Church  
Holland, MI  
RCA

Rev. Marie Duquette  
King of Kings Lutheran Church  
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The Evangelical Lutheran Church in America

Rev. Andrea DeWard  
Reformed Church in America  
Grand Rapids, MI  
Christian (RCA)

Rev. Jill Heather  
St James Lutheran  
Hazel Park, MI  
ELCA Lutheran

Rev. Charlotte Ellison  
First Presbyterian Church of Albion  
Albion, MI  
Protestant, Reformed, Presbyterian (PCUSA)

Rev. Mary Austin  
Westminster Church of Detroit  
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PC(USA)

Rev. Carey Mack  
Evangelical Lutheran Church in America  
Saline, MI  
Lutheran Christian

Rev. Kathryn Davelaar  
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Christian

Rev. Laura Kelsey  
First Presbyterian Church of Pontiac  
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Rev. Caroline Meyers  
First Congregational Church, UCC, Kalamazoo, MI  
Kalamazoo, MI  
Christian, United Church of Christ

Rev. Kathleen Robertson King  
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Rev. Judith McMillan  
First Presbyterian Church  
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Rev. Susan Gillespie  
Trinity Covenant Church  
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Rev. Janet Abel  
First Congregational UCC of Binghamton NY  
Binghamton, NY  
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Rev. Stacey Midge

First Reformed Church  
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Rev. Marcia Stanard  
Unitarian Universalist Congregation at Willamette Falls  
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Rev. April Oristano  
First Christian Church (Disciples of Christ)  
Eugene, OR  
Christian Church (Disciples of Christ)

Rev. Tara Wilkins  
Bridgeport United Church of Christ  
Portland, OR  
Christian--United Church of Christ

Rev. Karlene Clark  
Wesley United Methodist Church  
Eugene, OR  
Christian

Rev. Patricia Liberty  
Retired  
Kingston, RI  
Christian

Rev. Holli S. Emore  
Cherry Hill Seminary  
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Pagan

Rev. Stacy N. Sergent  
Providence Baptist Church  
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Cooperative Baptist Fellowship

Rev. Mary Margaret Hunt  
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Rev. Chantel Nelson  
Promise UCC  
Dallas, TX  
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Rev. Victoria Reed Bailey  
University United Methodist Church  
Austin, TX  
Ecumenical Christian

Rev. Judy Brock  
Retired  
Frisco, TX  
Christian Church (Disciples of Christ)

Rev. Katelyn Melcher  
Bering UMC  
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Christian

Rev. V. Ruth Schulenberg  
Fort Worth, TX  
Christian Church (Disciples of Christ)

Rev. Kyndall Rothaus  
Lake Shore Baptist Church  
Waco, TX  
Baptist

Rev. Wendy Peters, UCC  
As You Like It, Really Kind Caregivers, Owner  
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Rev. Heidi Worthen Gamble  
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Rev. Pamela Griffith Pond  
Messiah Lutheran Church  
Novato, CA  
ELCA

Rev. Karen Stunkel  
The New Hope Church of Michigan  
Southfield, MI  
Presbyterian

Rev. Sara Baron  
First United Methodist Church of Schenectady  
Schenectady, NY  
United Methodist

Rev. Martha Koenig Stone  
Henrietta United Church of Christ  
Henrietta, NY  
United Church of Christ

Rev. Tiffany Henkel  
Metro Baptist Church  
New York, NY  
Baptist

Rev. Roberta Egli  
Trinity United Methodist  
Eugene, OR  
United Methodist

Rev. Nikki Stahl  
United Christian Church  
Austin, TX  
Christian - United Church of Christ

Rev. Erin Wyma  
Cathedral of Hope United Church of Christ  
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Church of the Redeemer UCC  
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United Church of Christ

Rev. Dr. Jennifer Rike  
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Presbyterian Church (U.S.A.)

Rev. Dr. Elizabeth Downs  
Presbyterian Church (USA)  
Livonia, MI  
Presbyterian Church (USA)

Rev. Dr. Diane Christopherson  
United Church of Christ  
Adrian, MI  
United Church of Christ

Rev. Dr. Merideth Mueller  
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Alliance of Baptists

Rev. Dr. Beth Cooper  
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United Church of Christ

Rev. Dr. Sharlyn DeHaven-Gates  
Holly Presbyterian Church  
Holly, MI  
Presbyterian Church (USA)

Rev. Lisa Goods  
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South Holland, IL  
United Church of Christ

Rev. Toni Smith  
United Church of Chester  
Chester, CT  
United Church of Christ

Rev. Melody Seaton  
Grace United Church of Christ  
Sauk Village, IL  
United Church of Christ

Rev. Liza Knapp  
Belchertown United Church of Christ

Greenfield, MA  
United Church of Christ

Rev. Stacey Simpson Duke  
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Ann Arbor, MI  
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Rev. Beth Rakestraw  
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Christian Church (Disciples of Christ)

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Evangelical Lutheran Church in America

The Rev. Dr. Lucretia Mann  
St Philip the Apostle Episcopal Church  
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Episcopal

The Rev. Dr. Elizabeth Kaeton  
Long Neck, DE  
Episcopal Church

Rev. Casey Kloehn  
The Belfry  
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ELCA

The Rev. Gretchen Denton (Ret.)  
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The Rev. Susan Sprowls  
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The Rev. Elizabeth Maxwell  
Church of the Ascension  
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The Rev. Carol Gadsden  
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The Rev. Greta Getlein  
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The Rev. Gillian Barr  
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The Rev. Canon Susan Russell  
All Saints Church  
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The Rev. Dr. Cynthia Howard  
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Andalusia, AL  
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The Rev. Dr. Allie Perry  
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United Church of Christ

The Rev. Dr. Robert Harvey  
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The Rev. Dr. Molly Louden  
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Rev. Rebecca Love  
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Rev. Janel Kolar  
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The Rev. Dr. Catherine Robinson  
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Presbyterian Church (U.S.A.)

Rev. Carol Myers  
Iowa Falls First United Methodist Church  
Iowa Falls, IA  
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Pastor Ivy Schulz  
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Gwinner, ND  
Lutheran - ELCA

Pastor Karla Cooper  
Quinn Chapel AME Church  
Lincoln, NE  
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Pastor Jo Hudson  
New Church - Chiesa Nuova, United Church of Christ  
Dallas, TX  
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Presbyterian Church Congregation Member Debra Lang  
First Presbyterian Church  
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Rev. Kathleen Denman  
First Congregational Church of Fresno  
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Rev. Sandie Richards  
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San Fernando, CA  
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Rev. Barbara Rolph  
Presbyterian Church (USA)  
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Rev. Barb McRae  
Northside PC

Ann Arbor, MI  
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Rev. Weatherly Burkhead Verhelst  
First United Methodist Church of Troy  
Troy, MI  
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Rev. Lorelei Kay  
Westminster Presbyterian Church  
Gallup, NM  
Christian

Rev. Anne Gardner  
First Baptist Church  
Clifton Springs, NY  
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Rev. Patricia Raube  
Union Presbyterian Church  
Endicott, NY  
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Rev. Jennifer Boyd  
Trinity Lutheran Church  
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Rev. Elizabeth Grasham  
Heights Christian Church (Disciples of Christ)  
Houston,, TX  
Christian Church (Disciples of Christ)

Rev. Lynn Gifford  
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Rev. Gusti Linnea Newquist  
First United Presbyterian Church  
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Presbyterian Church (U.S.A.)

Rev. Dr. Deborah White

St. Mary the Virgin  
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Rev. Betty Sivis  
First Christian Church (Disciples of Christ)  
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Sister Joan Brown,osf  
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The Rev. Dr. Cheryl Ann Elfond  
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Rev. Elsa Cook  
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Rev. Eleanor McCormick  
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The Rev. Dr. Jean Rodenbough  
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Pastor Trudy Franzen  
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Pastor The Reverend Angela Ying  
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Pastor and Professor, Honorably Retired Rebecca Prichard  
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Pastor, St Paul's United Church of Christ Sharon Littrell  
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Cedar park, TX  
UCC/Baptist

Rev. Aurelia Pratt  
Peace of Christ church  
Round rock, TX  
Baptist

Rev. Sonja Ingebritsen  
Community of Hope UCC  
Madison, WI  
Christian-United Church of Christ

Rev. Rebecca Niese

United Methodist Church, retired  
Arpin, WI  
United Methodist

Rev. Elder. Benita Ramsey  
Unity Fellowship Riverside  
Riverside, CA  
Non-Denominational

Rev. Mary Robert  
All Saints Episcopal Church (retired)  
Mobile, AL  
Episcopal

Rev. Linda Dew-Hiersoux  
The Table at Central United Methodist Church  
Sacramento, CA  
United Methodist

Rev. Elizabeth Griswold  
Parkside Community Church, UCC  
Sacramento, CA  
United Church of Christ

Rev. Mary Kay Will  
Retired, United Methodist Church  
Upland, CA  
United Methodist

Rev. Donna Gerold  
St Stephen's Episcopal Church  
Birmingham, AL  
Episcopal

Rev. Deb Howland  
Waukesha, WI  
United Church of Christ

The Rev. Margaret Taylor  
St. Francis Episcopal Church, Indian Springs AL,  
Birmingham, AL  
Episcopal

The Rev. Rilla Holmes  
Saint Peter's Episcopal Church  
Fountain Inn, SC  
Christian, Episcopalian

The Rev. Charlie Michele Hornes  
Athens First Presbyterian Church  
Athens, TX  
Presbyterian Church USA

Rebecca Stevens-Walter  
Union Theological Seminary, St. Lydia's, Not So Churchy  
New York, NY  
Christian, Presbyterian

Dr. Edith Guffey  
Kansas Oklahoma United Church of Christ  
Lawrence, KS  
United Church of Christ

The Rev. Dr. Mary Westfall  
Community Church of Durham, UCC  
Durham, NH  
Progressive Christian

Maureen McGill  
Christ Church Parish Pensacola FL  
Pensacola, FL  
Episcopal

Pastor Sara Freudenburg  
Trinity Lutheran Church  
Ann Arbor, MI  
Lutheran

Rev. Betsey Monnot  
All Saints Episcopal Church  
Sacramento, CA  
Episcopalian

Rev. Yuki Scroggins  
North Shore Baptist Church, Japanese Language Group  
Chicago, IL

ABC, USA

Rev. Jennifer Thomas  
Lutheran School of Theology at Chicago  
Shawnee, KS  
Evangelical Lutheran Church in America

Rev. Laurie Newman  
Westminster Presbyterian Church  
Portland, OR  
Presbyterian Church (USA)

Rev. Amy Stapleton  
United Methodist Church  
Cheverly, MD  
Christian- United Methodist

Associate Minister Kelly Hough Rogers  
Norfield Congregational Church  
Weston, CT  
United Church of Christ- Protestant

Pastor April Gutierrez  
Berry United Methodist Church  
Chicago, IL  
United Methodist

Pastor Johnna Hayward Muniz  
Chigasaki Covenant Church, Japan  
Chicago, IL  
Jesus Follower

Priest Julie Hoplamazian  
Grace Church  
Brooklyn, NY  
Episcopal

Priest in Charge, St John the Divine Nancy Gallagher  
Episcopal Church of St. John the Divine  
Eugene, OR  
Episcopal

Anna Case-Winters



Professor of Theology at McCormick Theological Seminary  
Fair Oaks Presbyterian Church, Oak Park, IL  
Oak Park, IL  
Presbyterian

Rev. Katherine Beckett  
St. John's UCC  
Minier, IL  
UCC

Rev. Rachel Helgeson  
Presbyterian Church  
Mount Vernon, IL  
Presbyterian

Rev. Mary Slenski  
Non-Parochial  
Indianapolis, IN  
Episcopal

Rev. Leslie Mills  
Unitarian Universalist Church of Elgin  
Elgin, IL  
Unitarian Universalist

Rev. Tracy Siegman  
First Christian Church  
Bethany, IL  
Disciples of Christ

Rev. Sally Iberg  
Pilgrim Congregational Church  
Oak Park, IL  
United Church of Christ

Rev. Lisa Sargent  
Hospital Chaplain  
Lafayette, CA  
Unitarian Universalist

Rev. Megan Cochran  
Lake View Presbyterian Church  
Chicago, IL

PCUSA

Rev. Susan Ryder  
New Covenant Community  
Bloomington, IL  
Christian

Rev. Carol McVetty  
American Baptist Churches of Metro Chicago  
Chicago, IL  
American Baptist

Rev. Sarah Jay  
Irving Park Baptist Church  
Chicago, IL  
American Baptist

Rev. Becky Hebert  
Retired  
Freeport, IL  
United Church of Christ

Rev. Annette Hill Briggs  
University Baptist Church, Bloomington, Indiana  
Bloomington, IN  
Baptist

Rev. Ann Pitman  
Grace Presbyterian Church  
Fort Wayne, IN  
PC(USA)

Rev. Barb Dinnen  
Trinity United Methodist Church  
Des Moines, IA  
United Methodist

Rev. Emily Miller  
Louisville Seminary  
Louisville, KY  
Presbyterian Church (U.S.A.)

Rev. Jean Alexander  
United Church of Christ-retired  
Bethesda, MD  
United Church of Christ

Rev. Anjel Scarborough  
Grace Episcopal Church  
Brunswick, MD

Rev. Deborah Vaughn  
Twinbrook Baptist  
Rockville, MD  
Alliance of Baptists

Rev. Deborah J Blood  
Maine Conference, UCC  
Hallowell, ME  
United Church of Christ

Rev. Sara Ewing-Merrill  
HopeGateWay United Methodist Church  
Portland, ME  
United Methodist

Rev. Genevieve Dox  
First Congregational Church of Antwerp UCC  
Massena, NY  
United Church of Christ

Rev. Cyndi Robinson Gavin  
St. John United Church of Christ  
Aurora, IL  
Protestant

Rev. Constance McIntosh  
1st Pres  
Welsh, LA  
PCUSA

Rev. Andrea CastroLang  
Westminster Congregational United Church of Christ  
Spokane, WA  
The United Church of Christ

Rev. Dr. Melinda V. McLain  
Mira Vista United Church of Christ  
El Cerrito, CA  
Christian

Rev. Dr. Sarah Lund  
St. Peter's United Church of Christ  
Indianapolis, IN  
Christian

Rev. Dr. Shannon Craigo-Snell  
Louisville Presbyterian Theological Seminary  
Louisville, KY  
Presbyterian Church (USA)

Rev. Dr. Denise McGuinness  
Living Tree Ministries  
Wenatchee, WA  
United Methodist

Rev. Dr. Heather Shortlidge  
First Presbyterian Church of Annapolis  
Annapolis, MD  
PC(USA)

Rev. Sally Scheib  
Bethel United Church of Christ  
Elmhurst, IL  
United Church of Christ

Rev. Karen Bush  
UCC Campus Ministry @ Community UCC  
Champaign, IL  
Christian

Rev. Eva Cameron  
Cedar Valley Unitarian Universalist  
Cedar Falls, IA  
Unitarian Universalist

Rev. Dr. Katherine Paisley  
Irving Park United Methodist

Chicago, IL  
United Methodist

Senior Pastor Laura Truax  
LaSalle Street Church  
Chicago, IL  
Evangelical non-denominational

Senior Pastor Victoria Burson  
MCC Baltimore  
Baltimore, MD  
Non Den.

The Rev. Amy Fallon  
Grace Place  
Dekalb, IL  
Episcopal

The Rev. Dr. Mitzi George  
Saint Barnabas Episcopal  
Lafayette, LA  
Episcopal

The Rev. Dr. Sandra L. Olsen Sandra Olsen  
United Church of Christ clergy  
Middletown, CT  
United Church of Christ

The Rev. Pamela Strobel  
Christ the Healer  
Stamford, CT  
Episcopal Church

Missionary Ronna Husby  
Evangelical Covenant Church  
Chicago, IL  
Evangelical

Rev. Deborah McBride  
Chaplain  
Evansville, IN  
United Church of Christ

Rev. Cindy Maddox  
First Congregational Church, United Church of Christ  
South Portland, ME  
United Church of Christ

Rev. Eva Sullivan-Knoff  
Ministry Mentors  
Chicago, IL  
Covenant

The Rev. Dr. Jacqueline Lewis  
Middle Collegiate Church  
New York, NY  
PCUSA

Transitional Pastor/ Head of Staff M. Elizabeth Wagner  
1st Presbyterian  
Springfield, IL  
Christian

Rev. Emily Otto  
United Church of Christ  
Cohoes, NY  
Christian

Rev. Bebb Stone  
Naurashaun Presbyterian Church  
Pearl River, NY  
Presbyterian

Rev. Kimberly Chastain  
United Presbyterian Church  
Binghamton, NY  
PCUSA

Rev. Jane Winters  
not currently called  
Elmira, NY  
PC(USA)

Rev. Rebecca Seely  
The Vine NYC  
New York, NY  
Lutheran (ELCA)

Rev. Lois Keen  
Retired  
Torrington, CT  
Episcopalian

Rev. Sheri Randolph  
First Congregational UCC  
Barstow, CA  
United Church of Christ

Rev. Helen M. Moore  
Episcopal Priest  
Hartford, CT  
Episcopal

Rev. MaryAnn Purtill  
Marlborough Congregational Church  
Marlborough, CT  
UCC

Rev. Deborah Packard  
1st Presbyterian Potsdam NY  
Potsdam, NY  
PC (USA)

Rev. Victoria Moss  
Ridgewood Presbyterian Church  
Ridgewood, NY  
PC (USA)

Rev. Adriene Thorne  
First Presbyterian Church of Brooklyn  
Brooklyn, NY  
Reformed

Rev. Sandy Damhof  
Journey United Church of Christ  
Albany, NY  
United Church of Christ

Rev. Tami Burks  
St. Thomas Episcopal, Mamaroneck NY  
Larchmont, NY  
Episcopal

Rev. Marion (Mimi) Lane  
Member: Everett UCC  
Tulalip, WA  
United Church of Christ

Rev. Jan Van Pelt  
United Church of Christ  
Seattle, WA  
United Church of Christ

Rev. Janet Gollery McKeithen  
United Methodist  
Santa Monica, CA  
Christian

Rev. Lucy Bunch  
Unitarian Universalist Society of Sacramento  
Sacramento, CA  
Unitarian Universalist

Rev. Ellen Quaadgras  
Westminster Unitarian Church  
East Greenwich, RI  
Unitarian Universalist

The Rev. Jocelynn Hughes  
The Belfry  
Davis, CA  
Episcopal

The Rev. Kathleen Murray  
Saint Mark's  
Keansburg, NJ



Episcopal

The Rev. Noel Bailey  
Ascension, Wakefield;  
Chapel of St. John the Divine, Saunderstown, RI  
Warwick, RI  
Episcopal

Rev. Janette Saavedra  
Memorial United Methodist Church  
Clovis, CA  
United Methodist Church

Dr. Kate Rohde  
Minister Emerita Unitarian Congregation of West Chester  
Portland, OR  
Unitarian Universalist Christian

Consulting Minister Jo Green  
UU Church of the Restoration  
Philadelphia, PA  
Unitarian Universalist

Ms. Patricia Boyle-Wight  
West Parish Congregational Church  
Newry, ME  
United Church of Christ

Rev. Dr. Mary Kuhns  
Presbyterian Church (U.S.A.)  
Claremont, CA  
Presbyterian (USA)

Sheryl Kinder-Pyle  
Executive Presbyter, Presbytery of the Inland NW  
Presbytery of the Inland NW  
Spokane, WA  
Presbyterian

Minister Susie Smith  
Community Activist  
Greenville, SC  
United Church of Christ

Pastor Pamela Yoder  
College Mennonite Church  
Goshen, IN  
Mennonite Church U.S.A.

Pastor Talashia Keim Yoder  
College Mennonite Church  
Goshen, IN  
Mennonite

Rev. Lesley Paine  
PC (USA)  
Metairie, LA  
Christian

Rev. Judi Edwards  
St. Paul's United Church of Christ  
Seattle, WA  
Christian

Rev. Gary Keene  
Camarillo United Methodist Church  
Camarillo, CA  
United Methodist

Rev. Lora Nafziger  
Assembly Mennonite Church  
Goshen, IN  
Mennonite

Rev. Sarah Renfro  
Geist Christian Church  
Fishers, IN  
Disciples of Christ

Rev. Judith Brain  
First Church in Wenham  
Essex, MA  
United Church of Christ

Rev. Jane Willan  
First Congregational Church of Paxton

Paxton, MA  
United Church of Christ

Rev. Sarah Napoline  
First Parish Universalist Church  
Stoughton, MA  
Unitarian Universalist

Rev. Jennifer Seaich  
BUCC  
Beavercreek, OR  
UCC

Rev. Katy Lloyd  
Welcome Table Christian Church (DOC)  
Seattle, WA  
Disciples of Christ

Rev. Diane Darling  
Alki United Church of Christ  
Seattle, WA  
United Church of Christ

Rev. Heather Tadlock  
Bethany Presbyterian Church  
Spokane, WA  
Presbyterian Church (USA)

Rev. Genavieve Heywood  
Veradale United Church of Christ  
Spokane, WA  
United Church of Christ

Rev. Kathy Raines  
Trinity United Methodist Church  
East Wenatchee, WA  
United Methodist

Rev. Jane Schmoetzer  
All Saints' Episcopal Church  
Richland, WA  
Episcopal

Rev. Ann Eidson  
Northshore United Church of Christ  
Woodinville, WA  
United Church of Christ

Rev. Alyssa Bell  
Shadle Park Presbyterian Church  
Spokane, WA  
Presbyterian

Rev. Serena Sullivan  
Presbyterian  
Tacoma, WA  
Presbyterian

Rev. Ruth M Brandon  
Everett United Church of Christ  
Everett, WA  
United Church of Christ

Rev. Karen Hagen  
Tippecanoe Presbyterian Church  
Milwaukee, WI  
Presbyterian

Rev. Dione Miller  
Trinity Lutheran Church  
Burlington, WI  
ELCA

Rev. Claire Beutler-Cruise  
United Church of Christ  
Milwaukee, WI  
United Church of Christ

Rev. Amy Parker  
Village Chapel Presbyterian Church  
Charleston, WV  
Presbyterian Church (USA)

Rev. Danese Collins  
Retired United Methodist Elder  
Middletown, DE

United Methodist

Rev. Mihee Kim-Kort  
UKIRK at IU - Presbyterian Church USA  
Bloomington, IN  
Christian - Presbyterian

Rev. Shelly Davis  
East Congregational Church, UCC  
Milton, MA  
Christian: United Church of Christ

Rev. Patricia Knorpp-Williams  
United Church of Ferndale  
Bellingham, WA  
United Church of Christ

Rev. Dr. Davida Foy Crabtree  
First Church in Windsor  
Windsor, CT  
United Church of Christ

Rev. Dr. Dee Eisenhauer  
Eagle Harbor Congregational United Church of Christ  
Bainbridge Island, WA  
United Church of Christ

Rev. Dr. Bobbi Dykema  
Olympic View Community Church of the Brethren  
Seattle, WA  
Anabaptist Christian

Rev. Dr. Bonnie Chandler-Warren  
(Ret.)  
Olympia, WA  
United Methodist

Rev. Elizabeth Griffin  
Retired  
Fairfax, VT  
United Methodist

Rev. Elaine Gaetani  
Congregational Church of Westborough, United Church of Christ  
Westborough, MA  
United Church of Christ

Senior Pastor Donna Pritchard  
First United Methodist  
Portland, OR  
United Methodist

The Rev. Patricia Ross  
Episcopal Diocese of Northern California  
Gualala, CA  
Episcopal

The Rev. Evelyn Wheeler  
Christ Episcopal Church  
Madison, IN  
Episcopal

The Rev. Jerres Jane Morrison  
Attender at Community Presbyterian Church, Post Falls, Idaho  
Rathdrum, ID  
Presbyterian (USA)

The Rev. Lorain Giles  
First Congregational Church, United Church of Christ  
South Hadley, MA  
United Church of Christ

The Rev. Grace Burson  
Holy Trinity Evangelical Lutheran Church  
Nashua, NH  
Episcopal/Lutheran

The Rev. Sue Trigger  
First Presbyterian Church  
Rockaway, NJ  
Presbyterian Church (USA)

The Rev. Noelle Damico  
Metro Association, United Church of Christ  
White Plains, NY  
United Church of Christ

Rev. Dr. Fennie Chang  
St. Thomas Episcopal Church  
Hacienda Heights, CA  
Episcopalian

The Rev. Dr. Ruth Meyers  
Church Divinity School of the Pacific  
Berkeley, CA  
Episcopal Church

The Rev. Patricia Handloss  
(Ret.)  
Duxbury, MA  
Episcopalian

The Rev. Helen McPeak  
St. Paul's/Resurrección  
Mount Vernon, WA  
Episcopal

The Rev. Este Gardner  
Good Shepherd Episcopal Church  
Berkeley, CA  
Episcopal

Rev. Catharine Cline  
United Church in University Place  
Tacoma, WA  
United Church of Christ

Rev. Amy Muia Amy Muia  
New Earth Recovery  
Mount Vernon, WA  
Covenant

Rev. Carol A. Jensen  
Trinity Lutheran  
Everett, WA  
ELCA

Karen Petersen Finch  
Associate Professor of Theology  
Whitworth University  
Spokane, WA  
Presbyterian

Dr. Susan Mason  
Dickey Memorial Presbyterian Church  
Dayton, OH  
Presbyterian

Lay Leader Lelanda Lee  
St. Stephen's Episcopal Church  
Longmont, CO  
Christian

Lay Leader Gretchen Chateau  
All Saints' - Atlanta, GA  
Atlanta, GA  
Episcopal

Kheresa Harmon  
Director of Admissions, School of Divinity at Gardner-Webb  
First Baptist Church, Forest City  
Forest City, NC  
CBF - Baptist

Rev. Karen Stoffers-Pugh  
Wesley UMC  
Fresno, CA  
United Methodist Church

Dr. Jan Rivero  
Wesley Memorial UMC  
Charlottesville, VA  
United Methodist



Rev. Joanne Elise Engquist  
Gethsemane Lutheran Church  
Seattle, WA  
Lutheran

Rev. Barbara Rice  
Hancock United Church of Christ  
Medford, MA  
Christian

Rev. Barbara Turner Delisle  
First Congregational Church of Montague  
Montague, MA  
UNited Church of Christ

Rev. Carol Reynolds  
First Congregational, UCC  
Millbury, MA  
United Church of Christ

Rev. Louise Higginbotham  
United Church on the Green, New Haven  
Acton, MA  
United Church of Christ

Rev. Nancy Lois  
Director of the Library, Andover Newton Theological School  
Newton Centre, MA  
Congregational Christian

Rev. Lauren Lorincz  
Pilgrim Congregational Church UCC  
Lexington, MA  
UCC

Rev. Sandra Hutchinson  
Oratory of St. Catherine of Siena  
Beverly, MA  
Independent Catholic Christian Church

Rev. Beverly Boke  
First Parish UU - Canton  
Canton, MA  
Unitarian Universalist

Rev. Robin Bartlett  
The First Church in Sterling, MA  
Sterling, MA  
UCC/UU

Rev. Theresa Stirling  
Waquoit Congregational  
Pocasset, MA  
United Church of Christ

Rev. Deborah Shipp  
Retired  
Wells, ME  
United Methodist

Rev. Patricia Stratton  
First Baptist Church, Rutland, VT  
Rutland, VT  
American Baptist

Rev. Mary Brownlow  
Norwich Congregational Church, UCC  
Norwich, VT  
Congregational - UCC

Rev. Jane Dwinell  
Retired  
Burlington, VT  
Unitarian Universalist

Rev. Dr. Michelle Walsh  
Tuckerman Creative Ministries for Justice & Healing  
Quincy, MA  
Unitarian Universalist

Rev. Dr. Sharon Wozencraft  
Retired  
Medway, MA  
Congregational -NACCC

Rev. Vicki Hammel  
Union Congregational Church of Maynard  
Maynard, MA  
United Church of Christ

Rev. Christina Williams  
First Congregational Church of Hadley  
Hadley, MA  
United Church of Christ

Rev. Jennifer Valentine  
First Congregational Church of Southampton UCC  
Southampton, MA  
United Church of Christ

Rev. Anne Robertson  
Executive Director, Massachusetts Bible Society  
Sandwich, MA  
United Methodist

Millie Magner  
University Christian Church  
Seattle, WA  
Christian Church (Disciples of Christ)

Belinda McCafferty  
First Baptist Church Decatur  
Decatur, GA  
Protestant

Jordan Humm  
Fifth Reformed Church  
Grand Rapids, MI  
Reformed Church in America

Theresa Postma  
Madison Square Church  
Grand Rapids, MI  
Christian Reformed

Janet Boone  
Grace United Methodist Church  
Oklahoma City, OK  
Christian

Healer Frances Malone  
St. Timothy's Episcopal  
Cincinnati, OH  
Episcopal

Deaconess Darlene DiDomineck  
Interim Executive Director, Methodist Federation for Social Action  
Washington, DC  
United Methodist

Libbie Crawford  
St. Timothy's  
Williamsburg, OH  
Episcopal

Dr. Linda Stenger  
Zion United Church of Christ  
Kansas City, MO  
UCC

Dr. Kristen Donnelly, MSW, M.Div  
St. Andrew's Episcopal  
Yardley, PA  
Protestant

Summer Stough  
Educator/Administrator  
Christ the King Episcopal Church  
Santa Rosa Beach, FL  
Episcopalian

Elder Janice Hunter  
Oak Hills Presbyterian Church

Cincinnati, OH  
Presbyterian

LCSW Tihara Taverner  
Transit Community Church  
Alexandria, VA  
Non denominational

Pastor Susan Wargo  
Tabernacle United Church  
Philadelphia, PA  
United Church of Christ

Mrs Erin Wilson  
Asbury United Methodist  
Delaware, OH  
Christian

Ms. Amy Adams  
United Church  
Tallahassee, FL  
Christian

Ms. Nicole Pickens  
Radnor Congregational Church  
Delaware, OH  
United Church of Christ

Ms. Barbara Powell  
UCC  
Rocky River, OH  
Christian

Becky Peters  
Presbyterian Elder and Moderator of Presbyterian Women  
First Presbyterian Church  
Greensboro, NC  
Presbyterian

Pamela Briggs  
Church of the Nativity Episcopal  
Huntsville, AL  
Episcopal

Linda Fowler  
Roswell United Methodist Church, Roswell, GA  
Alpharetta, GA  
United Methodist

Marcie Denton  
Forest Hill Church, Presbyterian, Cleveland Heights, Ohio  
Cleveland Heights, OH  
Presbyterian

Alice Weimer  
First Presbyterian Church of Port Allegany PA  
Turtlepoint, PA  
Presbyterian

Katherine Dummer  
Wauwatosa Presbyterian  
Milwaukee, WI  
Presbyterian

Ms. Sondra Haaga  
Duke Divinity School  
Apex, NC  
Evangelical Christian

Congregant Mary Ellison  
Ascension Holy Trinity  
West Park, NY  
Episcopal

Deacon Judy Davies  
Lakeshore Baptist Church  
Woodway, TX  
Christian

Dr. Jean Morris Trumbauer  
St. Albert the Great Parish  
Minneapolis, MN  
Roman Catholic

M.Div. Dawn Christenson  
1st Congregational Church UCC  
Charlotte, MI  
Christian

Mr. Michael Kluznik  
United Church of Christ  
Mendota Heights, MN  
Christian

Mrs Ann Hirsch  
St Paul's Montvale NJ  
Teaneck, NJ  
Episcopalian

President/Co-Founder Emily Nielsen Jones  
Redeemer Community Church  
Needham, MA  
Protestant

Ruling Elder Carol Hylkema  
Littlefield Presbyterian Church  
Westland, MI  
Presbyterian Church (U.S.A.)

Seminary Student Susan Greenwood  
Hope UCC  
Berrien Springs, MI  
United Church of Christ

Youth Minister Pamela Cook  
SpringHouse Ministry Center  
Minneapolis, MN  
United Church of Christ, Baptist

Jojo Sabin  
Episcopal  
Saint Paul, MN  
Episcopal

Sr. Linda Ballard, OSC  
Order of St. Catherine  
Woburn, MA  
Roman Catholic

Laura McDermott  
UU Rockford  
Loves Park, IL  
UU

Rebecca O'Neill  
Union United Methodist Church  
Fall River, MA  
Christian

Congregant LuAnn Wherry  
First United Methodist Church of San Diego  
San Diego, CA  
Methodist

Dr. Carolyn Holderread Heggen  
Albany Mennonite Church  
Corvallis, OR  
Mennonite

Elder Theresa Taylor-Stinson  
Northwood Presbyterian Church  
Silver Spring, MD  
Presbyterian

Taylor Gould  
United Church Rogers Park  
Chicago, IL  
United Methodist

Violet Ricker  
Urban Village Church  
Chicago, IL  
United Methodist

Ms Hannah Johnston  
St Lydia's Dinner Church  
Brooklyn, NY



ELCA

Ms. Clara Morgan  
Trinity, FL  
Presbyterian Church (U.S.A.)

Ms. Martha Mattes  
Trinity Episcopal Church  
Tulsa, OK  
Episcopal

Sharon R Smith  
Madison Square Church  
Grand Rapids, MI  
Reformed

Stefanie Olsen  
Indian Rocks Baptist  
Odessa, FL  
Spiritual

Ruth Lapp Guengerich  
Eighth St. Mennonite  
Goshen, IN  
Mennonite

Cheryl Smith  
GCUMC  
Greensboro, NC  
Methodist

Melissa Mines  
First Baptist Austin  
Austin, TX  
Baptist

Karen Idler  
Associate in Ministry  
Lutheran Church of the Resurrection  
Granite Bay, CA  
Lutheran

Sherie Roberts

Certified Spiritual Director  
Newtown Congregational Church  
Southbury, CT  
Christian

Dr. Emily Holmes  
Christian Brothers University  
Memphis, TN  
U.C.C.

Gaz Jav  
Central Mosque  
Charleston, SC  
Muslim

Catherine Shook  
Martin Luther Evangelical  
Mathias, WV  
Lutheran

Heidi Thompson  
St. Camillus Roman Catholic Church  
Washington, DC  
Christian

Rachel Anderson  
Cedar Ridge Community Church  
Takoma Park, MD  
Christian

Patti Joy Posan  
St James Episcopal, Sewanee  
Sewanee, TN  
Episcopal

Church Elder Rebecca Stanton  
Park Avenue Christian Church  
New York, NY  
Disciples of Christ

Dr. Lisa Reiter  
Director of Campus Ministry  
Loyola University Chicago

Chicago, IL  
Catholic

Celia Finfrock  
Director of Children and Family Ministry  
Grace United Methodist Church  
Mt. Juliet, TN  
United Methodist

Dr. Jane Phares  
East Lake United Methodist Church  
Birmingham, AL  
Christian - United Methodist

Dr. Susan Stouffer  
United University Church  
Los Angeles, CA  
Christian - United Methodist and Presbyterian, USA

Dr. Cheryl Balkcom  
United Church on the Green, New Haven CT  
Bridgeport, CT  
United Church of Christ

Dr. Marilyn Kelly  
Trinity Presbyterian Church of McKinney  
McKinney, TX  
Presbyterian

Elder Rebecca Harbor Jones  
Grace Presbyterian Church (USA)  
Madison, AL  
Presbyterian (USA)

Elder Sonnie Swenston  
First Presbyterian Church of Baldwin Park  
Covina, CA  
Presbyterian Church (USA)

Lay Leader Jenn Peterson  
Broadway UMC, Chicago  
Chicago, IL  
United Methodist

Beverly Hurley Hill  
Lay Ministries Coordinator  
Diocese of East Tennessee  
Signal Mountain, TN  
Episcopalian

Layperson Heather Allegrizza  
St. Stephens Episcopal  
Vestavia, AL  
Episcopalian

Mrs. Sarah Buki  
Evangelical Covenant Church  
Chicago, IL  
Christian

Mrs. Marilyn Lowe  
St. Andrews Episcopal Cathedral  
Jackson, MS  
Episcopalian

Mrs. Linda Mae Bell  
Wiltshire Baptist  
Dallas, TX  
Baptist

Mrs. Diana Austin  
Community North Baptist Church  
McKinney, TX  
Baptist

Mrs. Shelley Kesselman  
St. Andrew's Episcopal  
Manchester, NH  
Episcopal

Ms Mellanie Brenna  
Chicago, IL  
American Baptist

Ms Sally Lemly Knutson  
Protestant

Niskayuna, NY  
Christian

Ms Sarah Moden-Alliston  
United Methodist Church  
Ft Worth, TX  
UMC

Ms Rhonda McIntosh  
Faith Presbyterian Church  
Mathias, WV  
Presbyterian

Ms. Karis Post  
Christ Episcopal Church  
Rochdale, MA  
Episcopalian

Ms. Clara Olivas  
First Presbyterian Church (USA)  
Albuquerque, NM  
Presbyterian

Ms. Linda LeTendre  
Presbyterian New England Congressional Church  
Saratoga Springs, NY  
Quaker & Catholic

Ms. Nancy Brown  
Cooperative Baptist Fellowship  
Columbia, SC  
Cooperative Baptist Fellowship

Ms. Helen LaKelly Hunt  
The Sister Fund  
Dallas, TX  
Southern Baptist

Ms. Patricia Metzger  
Fox Island United Church of Christ  
Fox Island, WA  
Christian

Ms. Erin Dyer  
St. Paul Reformation Lutheran Church  
Minneapolis, MN  
Lutheran - ELCA

Ms. Peggy Patrick  
St. Clare Catholic  
Berea, KY  
Catholic

Jill Swiers Baker  
Outreach Minister  
Albany Mennonite Church  
Albany, OR  
Mennonite

Ann Marie Eckert  
Pastoral Associate  
St. Catherine of Siena Catholic Church  
Ithaca, NY  
Catholic

Retired Catherine Allen  
Mountain Brook Baptist Church  
Mountain Brook, AL  
Baptist

Katherine Kawamoto  
Secretary  
SCDP Faith Caucus  
Irmo, SC  
Interfaith organization

Rhoda Keener  
Sister Care Director, Mennonite Women USA  
Hebron Mennonite Church  
Shippensburg, PA  
Mennonite

Anna Holmes  
Maggie's House Women Recovery Home  
Birmingham, AL  
Presbyterian

Joyce Neighbors  
Church of the Epiphany  
Leeds, AL  
Episcopal

Mande Corbett  
Mosaic Church & Pulaski Heights Baptist Church  
Little Rock, AR  
Non-denominational

Carol Mack  
Holy Trinity Lutheran Church  
Thousand Oaks, CA  
Evangelical Lutheran Church in America

Sara Macdonald  
St. Peter's Episcopal Church  
Santa Maria, CA  
Episcopalian

Mary Barnett  
Trinity in the green  
New Haven, CT  
Episcopalian

Joyce Hill  
United Methodist  
Norwalk, CT  
United Methodist

Ann McGloin  
Zion Episcopal Church  
Guilford, CT  
Episcopalian

Marian DiFabbio  
Unitarian Universalist Congregation of Danbury  
New Fairfield, CT  
Unitarian Universalist

Viola Mayol  
North Shore Baptist Church

Chicago, IL  
American Baptist

Rosa Lee Osterbur  
Hope United Church of Christ  
Armstrong, IL  
United Church of Christ

Kate Trigger Duffert  
Louisville Presbyterian Theological Seminary  
Louisville, KY  
PC(USA)

Madeleine Mysko  
Towson Presbyterian Church  
Towson, MD  
Catholic and Presbyterian

Ann Lehwald  
Towson Presbyterian  
Baltimore, MD  
presbyterian

Katie McCabe  
Towson Presbyterian Church  
Baltimore, MD  
Presbyterian

Candy Deal  
First United Church of Coleraine and Bovey  
Bovey, MN  
Presbyterian

Ann Hanson  
Mayflower United Church of Christ  
Billings, MT  
Protestant - United Church of Christ

Susan Samuelson  
Jamestown Friends Meeting  
Jamestown, NC  
Quaker



Ruby Fulbright  
Retired  
Newton, NC  
Baptist

Kathy Peterson  
First Lutheran  
Greensboro, NC  
Lutheran

Sharon Oler  
Second Presbyterian Church Albuquerque  
Estancia, NM  
Presbyterian

Julie A. Arms Meeks  
St. Mark UMC  
Atlanta GA

Christine Lindquist  
Presbyterian Church of Morristown, NJ  
Mount Tabor, NJ  
Presbyterian

Martha Good  
St. John's United Methodist Church, Church Women United  
Los Ranchos, NM  
United Methodist

Heidi Friesen Wutzke  
Portland Mennonite Church  
Portland, OR  
Mennonite

Gwenette Gaddis  
University Baptist Church  
Corvallis, OR  
Baptist

Caroline Pippert  
Newman Congregational Church, United Church of Christ  
Warwick, RI  
United Church

Keller Barron  
Eastminster Presbyterian  
Columbia, SC  
Christian

Director of Family Ministry Winona Poole  
La Mesa Presbyterian Church  
Albuquerque, NM  
Presbyterian

Patti Joy Posan  
St James Episcopal, Sewanee  
Sewanee, TN  
Episcopal

Carol Dornbush  
Nauraushaun Presbyterian Church  
Pearl River, NY  
Reformed Christian

Susan Pool  
Shoreline Covenant Church  
Edmonds, WA  
Evangelical Christian

Stephanie Granger  
First United Methodist Church  
Hopkinton, MA  
Protestant

Rose Berger  
Christian Educator  
St. Camillus Catholic Church  
Washington, DC  
Roman Catholic

Bishop's Deacon Gyllian Davies  
St John's Anglican Cathedral  
Saskatoon, SK

Anglican

The Rev. Ms. Susie Williams  
St Giles, Sidbury with St Peter's Sidford and St Francis Woolbrook  
Sidford, Harcombe Lane  
Anglican

Obispa Apoyo  
ARCWP  
Envigao, Antioquia- Colombia  
Católica Romana

Rev. Michelle Wahila  
Pittsburgh Presbytery Member at Large  
Paris, France  
PCUSA

Rev. Nancy Nyberg  
Retired UCC Pastor  
DeMotte, IN  
UCC

Lynn Marlin  
Sunday School teacher, Women's Bible Study Facilitator, Worship Leader  
Grace United Methodist Church  
Warren, OH  
Methodist

Lucy Henry  
Emmanuel United Church of Christ  
Greenville, SC  
Baptist/UCC

Cindy Noland  
St. Austin's Catholic Church  
Austin, TX  
Roman Catholic

Patricia Wilson  
Seventh & James Baptist, Waco, TX  
Waco, TX

Baptist

Katie Catterfeld  
First Baptist Church of Austin  
Austin, TX  
Baptist

Brandalyn Rodgers  
FaithWorks Community Church  
Rowlett, TX  
Christian - Baptist

Joyce Kokel  
Wilshire Baptist Church  
Dallas, TX  
Baptist

Sanchia Gonsalves  
St Austin Catholic Church  
Austin, TX

Natalie Vaughn  
First Baptist Church of Austin  
Austin, TX  
Baptist

Carol Wimmer  
Author  
College Hill Presbyterian  
Tulsa, OK  
Christian

Irene DeMaris  
Methodist Federation for Social Action, Chair of the Reproductive Health & Justice FAN  
Seattle, WA  
United Methodist

Rev. Gail Benson  
Transitional Minister  
Whittier, CA  
United Church of Christ



February, 11, 2016

Dear Mr. Trump,

My name is Jackson Wheelless. I am 8 years old, and in the third grade at Millis Road Elementary School in Jamesstown, NC. My teacher, Mrs. Brown, encourages us to watch current world news and read current news articles. I have read several articles about you and have seen you on the television. I think you have been very rude to many people.

I would like for you to know that kids are watching you. The President of the United States is supposed to be our leader. You should be someone that we can learn from and hope to grow up to be like. I do not think you are doing a very good job of this. I know that you are talking to adults when you give your speeches, because they are the ones that can vote. It is important for you to remember that children are watching and hearing you, too. Someday, we will also be able to vote. Someday, we will be the ones running for President.

I learned about The Golden Rule when I was VERY young. How would you feel if people said some of these terrible things about you that I have heard you say about them? I would like to know if you would want your young children or grandchildren hearing the things that you say about people. Do you ever feel sorry about the things that you say that are hurtful to others? I have never heard you apologize.

I saw a video of you making fun of a handicapped reporter, and I thought that was TERRIBLE! My friends and I talked about that at school. What would happen if young people decided that it was OK to make fun of handicapped people after watching you do that on national TV? Bullying is already a HUGE problem, and it is NOT OK! I feel like you could make that problem much worse!

You bragged that you "could stand in the middle of Fifth Avenue and shoot somebody" and wouldn't lose any votes. I REALLY hope this is not true! You make kids afraid when they hear that someone who could be our next President would even think of doing something like that!

Please, Mr. Trump, start thinking about the children in this country. We may not be able to vote yet, but we are the future. I think it is important for us to have a kind, honest, caring person as our leader that we can look up to and respect. I am in the student government this year at my school. I try to be a student that everyone can look up to. I will grow up to be a husband, a father, hopefully a police officer, and a good friend. I will choose to be a better person than what you have been teaching me to be. I will live like my parents, teachers, and church leaders have taught me to be. Some kids don't have great adults in their life like I do. Please try to remember that!

Sincerely,

Jackson Wheelless

Jackson Wheelless

# United States Senate

WASHINGTON, DC 20510

January 17, 2018

President Donald Trump  
The White House  
1600 Pennsylvania Avenue, NW  
Washington, D.C. 20500

Dear President Trump:

We write to express our extreme concern regarding your seeming lack of commitment to the White House Office of National Drug Control Policy (ONDCP), which plays a critical role in coordinating the federal government's response to the fentanyl, heroin and opioid epidemic.

On January 14, the Washington Post reported on Taylor Weyeneth, a 24-year-old political appointee who served as Deputy Chief of Staff for ONDCP, despite his complete lack of drug policy experience. Weyeneth had no relevant work experience and only held one full-time job prior to joining the administration – working for the Trump campaign.

As troubled as we are by Weyeneth's appointment, your delay in nominating qualified leaders for ONDCP and the Drug Enforcement Administration (DEA) is even more concerning. Both agencies have been without permanent, Senate-confirmed leadership since you took office – and you have not presented the Senate with qualified candidates for these positions. Your first nominee to lead ONDCP withdrew his nomination following severe criticism over his close ties to the pharmaceutical industry, and you have yet to put forward a nominee to lead the DEA. We appreciate the work of the civil servants who are serving as acting heads of ONDCP and DEA, but acting leaders cannot enact the kind of robust response to the ongoing fentanyl, heroin and opioid epidemic that the crisis demands.

You have claimed that the opioid epidemic is a top priority for your administration, but the personnel you have staffing these key agencies – and the lack of nominees to head them – is cause for deep concern. This crisis knows no bounds, and we are committed to working across party lines with anyone who is serious about addressing this devastating epidemic. We hope to work with you, beginning with confirming qualified personnel to these key agencies. To that end, we request that you:

1. Provide our offices with a list of your political appointees to key drug policy positions and those appointees' relevant qualifications, including appointees at ONDCP; the Department of Justice, including the DEA; the Substance Abuse and Mental Health Services Administration (SAMHSA); and elsewhere in your administration; and

# United States Senate

WASHINGTON, DC 20510

October 17, 2018

The Honorable Donald Trump  
President of the United States  
The White House  
1600 Pennsylvania Avenue, N.W.  
Washington, D.C. 20500

Dear President Trump:

We write today to request information regarding any financial ties between the Kingdom of Saudi Arabia and your family business interests.

The United States maintains a deep and complex relationship with Saudi Arabia going back many decades. Saudi Arabia is one of the world's few remaining absolute monarchies, and the source of immense petro-wealth. The wealth acquired from oil and gas is frequently used abroad in pursuit of its political interests.

According to public reports, the Trump Organization for decades has maintained business relationships with the government of Saudi Arabia and members of the Saudi royal family. For instance, in 1995, a Saudi prince led a group of investors that acquired the Plaza Hotel in a deal to pay off Trump Organization debts on the property for \$325 million.<sup>1</sup> Similarly, public reports indicate that members of the Saudi royal family have acquired real estate at Trump properties for decades. Known real estate sales include the sale of the 45<sup>th</sup> floor of the Trump World Tower for \$12 million,<sup>2</sup> and the purchase of a triplex Trump Place apartment by a Saudi Prince who eventually sold it this year for \$36 million.<sup>3</sup> Reports also revealed that a Trump-owned 281 foot yacht was sold to a Saudi prince in 1991 for \$20 million.<sup>4</sup>

Your recent statements, and public reports of increased spending by the Saudi government at Trump properties, raise significant concerns about financial conflicts of interest. At a rally in

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<sup>1</sup> David Stout and Kenneth Gilpin, "Trump Is Selling Plaza Hotel To Saudi and Asian Investors." *The New York Times*, April 12, 1995, <https://www.nytimes.com/1995/04/12/business/trump-is-selling-plaza-hotel-to-saudi-and-asian-investors.html>.

<sup>2</sup> Bernard Condon, Stephen Braun and Tami Abdollah, "'I love the Saudis': Trump business ties to kingdom run deep." *AP*, October 12, 2018, [https://www.washingtonpost.com/national/i-love-the-saudis-trump-business-ties-to-kingdom-run-deep/2018/10/12/bcc0eda4-ce78-11e8-ad0a-0e01efba3cc1\\_story.html](https://www.washingtonpost.com/national/i-love-the-saudis-trump-business-ties-to-kingdom-run-deep/2018/10/12/bcc0eda4-ce78-11e8-ad0a-0e01efba3cc1_story.html).

<sup>3</sup> David A. Farenthold and Jonathan O'Connell, "'I like them very much': Trump has long-standing business ties with Saudis, who have boosted his hotels since he took office." *The Washington Post*, October 11, 2018, [https://www.washingtonpost.com/politics/i-like-them-very-much-trump-has-long-standing-business-ties-with-saudis-who-have-boosted-his-hotels-since-he-took-office/2018/10/11/0870df24-cd67-11e8-a360-85875bac0b1f\\_story.html](https://www.washingtonpost.com/politics/i-like-them-very-much-trump-has-long-standing-business-ties-with-saudis-who-have-boosted-his-hotels-since-he-took-office/2018/10/11/0870df24-cd67-11e8-a360-85875bac0b1f_story.html).

<sup>4</sup> *Id.*



Mobile, Alabama on August 21, 2015, you were recorded on video stating: “Saudi Arabia. I get along with all of them. They buy apartments from me. They spend \$40 million. \$50 million.”<sup>5</sup> Additionally, the Saudi government has spent substantial sums at three Trump branded hotels in the last two years, since you were elected President. The Trump International Hotel in Washington, D.C., the Trump International Hotel in Manhattan and the Trump International Hotel and Tower in Chicago have all reported a substantial increase in spending from Saudi visitors since you were elected President,<sup>6</sup> which raises separate questions about your compliance with the Foreign Emoluments Clause of the Constitution.

The international community is deeply concerned about the Saudi government’s reported involvement in the extrajudicial disappearance or killing of Washington Post journalist and U.S. resident Jamal Khashoggi, a known critic of the Saudi government. Mr. Khashoggi’s whereabouts have been unknown since he entered the Saudi consulate in Istanbul on October 2<sup>nd</sup>. His fiancée maintains she waited outside for him and he never came out. The Turkish government has reportedly provided U.S. officials with significant evidence indicating that Khashoggi was likely killed inside the Saudi consulate.<sup>7</sup>

Accordingly, a bipartisan group of twenty-two Senators recently called for an investigation and a Global Magnitsky Act determination relating to the circumstances surrounding Mr. Khashoggi’s disappearance and possible murder. It is imperative that this sanctions determination, and U.S. policy towards Saudi Arabia generally, are not influenced by any conflicts of interest that may exist because of your or your family’s deep financial ties to Saudi Arabia.

As President, you have refused to withdraw your financial interest in the Trump Organization.<sup>8</sup> In order for Congress to better understand any potential conflicts of interest that may exist between you, the Trump Organization, and the Kingdom of Saudi Arabia, please provide responses to the following questions and requests for documents no later than November 17, 2018:

1. All documents pertaining to investments, payments, or other financial transfers from the Kingdom of Saudi Arabia, including members of the Saudi royal family and other Saudi nationals, to Trump Organization properties within the last ten years. This includes the process by which payments from entities or individuals from Saudi Arabia are identified, and a detailed accounting of all income to the Trump Organization from Saudi interests in the last ten years.
2. Have you or any officials of the Trump Organization discussed potential investments or business deals involving Saudi Arabia or Saudi investments since June 16, 2015? If yes,

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<sup>5</sup> Id.

<sup>6</sup> Id.

<sup>7</sup> Shane Harris, Souad Mekhennet, John Hudson and Anne Gearan, “Turks tell U.S. officials they have audio and video recordings that support conclusion Khashoggi was killed.” *The Washington Post*, Oct. 11, 2018, [https://www.washingtonpost.com/world/national-security/turks-tell-us-officials-they-have-audio-and-video-recordings-that-support-conclusion-khashoggi-was-killed/2018/10/11/119a119e-cd88-11e8-920f-d52e1ae4570\\_story.html](https://www.washingtonpost.com/world/national-security/turks-tell-us-officials-they-have-audio-and-video-recordings-that-support-conclusion-khashoggi-was-killed/2018/10/11/119a119e-cd88-11e8-920f-d52e1ae4570_story.html).

<sup>8</sup> Chase Peterson-Withorn, “Trump Refuses To Divest Assets, Passes Control to Sons.” *Forbes*, Jan. 11, 2017, <https://www.forbes.com/sites/chasewithorn/2017/01/11/donald-trump-will-hand-over-business/#469c9f4460d7>.

please identify the dates, locations and participants of those discussions, including the topics of those discussions in as much detail as possible.

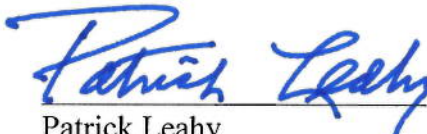
3. Has the government of Saudi Arabia or any Saudi national provided you with any gifts or anything else of value since you were elected President? If so, have you consulted with ethics officials regarding these gifts, including the White House counsel's office or the Office of Government Ethics? Please identify the gifts or items of value and their approximate value.
4. Will you commit to suspending any ongoing business relationships between any entities you or your family have a financial interest in and the Kingdom of Saudi Arabia until the Magnitsky investigation is complete?
5. If a Magnitsky investigation finds that senior officials of the Kingdom of Saudi Arabia ordered or were involved with the murder or abduction of Mr. Khashoggi, will you terminate any business relationships between the Kingdom of Saudi Arabia and entities in which you have a financial interest, including Trump Organization entities?

Thank you for your prompt attention to these important requests. We are sending an identical request to Donald Trump Jr. and Eric Trump at the Trump Organization.

Sincerely,




Tom Udall  
United States Senator



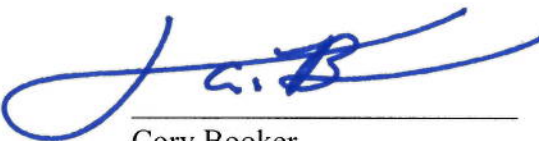
Patrick Leahy  
United States Senator



Richard Durbin  
United States Senator



Elizabeth Warren  
United States Senator



Cory Booker  
United States Senator



Martin Heinrich  
United States Senator

*Edward J. Markey*

Edward Markey  
United States Senator

*Tammy Duckworth*

Tammy Duckworth  
United States Senator

*Sheldon Whitehouse*

Sheldon Whitehouse  
United States Senator

*Richard Blumenthal*

Richard Blumenthal  
United States Senator

*Jeffrey A. Merkley*

Jeff Merkley  
United States Senator

**Congress of the United States**  
**Washington, DC 20515**

Donald J. Trump  
President-elect of the United States  
Trump Tower  
725 5<sup>th</sup> Avenue  
New York, NY 10022

November 16, 2016

Dear President-elect Trump:

Immediately following your victory, many Americans were optimistic and hopeful that you would take the steps necessary to unify our country following the divisive and contentious election. In your election night speech you said, "Now it's time for America to bind the wounds of division. It is time for us to come together as one united people." Unfortunately, your appointment of Stephen Bannon, whose ties to the White Nationalist movement have been well-documented, directly undermines your ability to unite the country. As elected representatives of millions of Americans from diverse backgrounds, religions, and ethnicities, we strongly urge you to reconsider your decision to appoint Mr. Bannon to White House Chief Strategist.

Since the election there have been a number of incidents across the country in which minorities, including Muslim Americans, African Americans, Hispanic Americans, and Jewish Americans, have been the targets of violence, harassment and intimidation. Mr. Bannon's appointment sends the wrong message to people who have engaged in those types of activities, indicating that they will not only be tolerated, but endorsed by your Administration. Millions of Americans have expressed fear and concern about how they will be treated by the Trump Administration and your appointment of Mr. Bannon only exacerbates and validates their concerns.

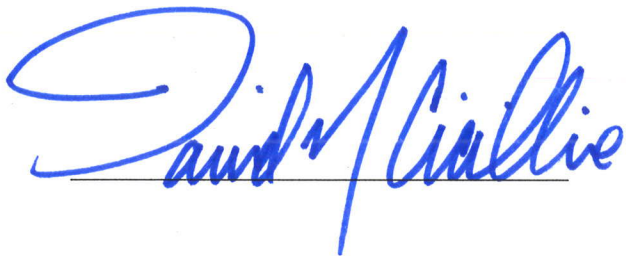
As the Executive Chairman of Breitbart News, Mr. Bannon repeatedly and aggressively pushed stories that promote anti-Semitism, xenophobia, and racism. During an interview last summer, Mr. Bannon bragged that Breitbart was "the platform for the alt-right," a movement that upholds White Nationalism while strongly rejecting diversity in any form. Under Mr. Bannon's leadership, Breitbart has referred to a leading Republican who opposed your election as a "Renegade Jew," suggested "Young Muslims in the West are a ticking time bomb," declared that the "Confederate flag proclaims a glorious heritage," and praised the alt-right as a "smarter" version of "old-school racist skinheads."

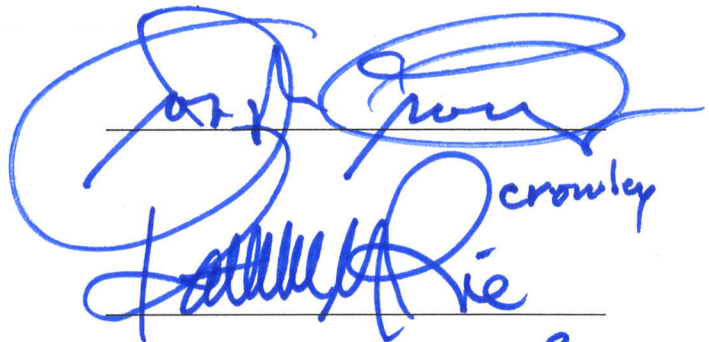
Disturbingly, leading white nationalists like former KKK Grand Dragon David Duke, American Nazi Party Chairman Rocky J. Suhadya, Richard Spencer, Peter Brimelow, and Brad Griffin have praised the news of Mr. Bannon's appointment. We believe it should concern you that civil rights groups, including the Anti-Defamation League and the Southern Poverty Law Center, are widely opposed to Mr. Bannon's appointment.

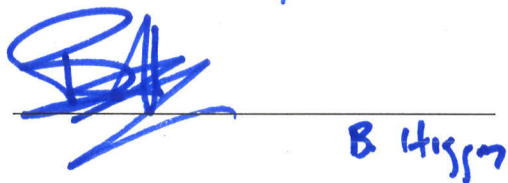
We strongly believe that Mr. Bannon's appointment will not allow the country to heal and come together as one. As one of your top advisors, the White House chief strategist will help set the tone for your administration. The person in this role must be prepared to serve the interests of all Americans, not those of a select few.

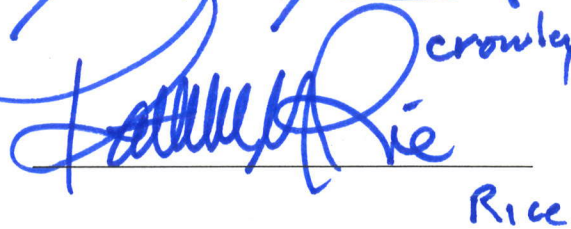
Once again, we strongly urge you to rescind this appointment immediately and build a diverse White House staff who are committed to the core American values of inclusiveness, diversity and tolerance.

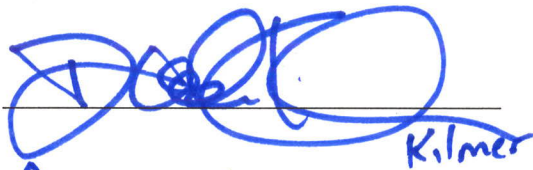
Sincerely,

  
David Mallick

  
John Crowley

  
B. Higgins

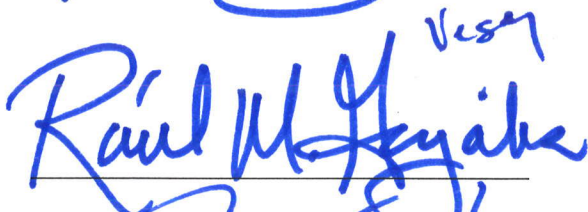
  
L. Rice


  
Kilmer

  
Nancy Kaptur, OH-9

  
Vesey

  
Bebo O'Rourke.

  
Raúl M. Grijalva

  
Di V. [unclear]

  
Chris Shover

  
Ed Ruffalo

Paul Stone

Donna F. Edwards

Paul Adams

J. J. J.

Donna A. Davis Chlorine

Bob McCall

Ruby Higgins

Alan Smith

Nita M. Lacy

Alfred L. L.

Bill Pasarell Jr

Julie Spive

Mike Dingley

John T.

Rock Linn

Aunt E. Conky

Mollie Waters

Lidia M. Velazquez  
Suzanne Green

*[Handwritten signature]*

Ron Adams  
Joyce Beatty  
Kathy Coe

John P. Sabares

Susan A. Davis

Mark D. Se

Steve Lopez TW9

Jimmy McHenry CA9

Frank Pelly  
Dale Baker

James C. Hines

Paul C. Lee  
Brenda F. Byle  
Ron Kivell

Mike Thompson

And G. L. [Signature]

Steve [Signature] KY-3

Joe Courtney

*[Handwritten signature]*

Nomayor CA-35

Gene King TX-29

Smith & Jones MA-2

Eleanor H. Weston

Red Deutch FL-21

Barbara Lee

Joe King WA-4

~~Al King~~

Thomas TN-5

~~Gregory White~~

Michelle Ryan Idaho 01

Suzanne DeBee WA-01

Addie Bernice Johnson TX-30

William C. Cole MI-5

Jackie Ann SW-7

Shirley Jackson Lee

Mike Jordan CA-17

Paula Taylor NY-20

Ted W. Green CA-33

Quinn Formner CA-26

Rene LeBeau IA-02

Pat DeFuria OR-4



Jerold Nadler  
Cui Franke

Choi Bustos

Alan Lowenthal

Bonnie Watson Coleman

Grace E. Napolitano

Madeline J. Bordallo

Mitch A. Cristof

Katherine Clark

James J. Driscoll

John Bitter

Tom Kelle

Karen Bass

Yvette D. Clarke

Anna Escobedo Cabral

Ami Bera

Denny Heck

Debbie Wasserman Schultz FL-23

Rosa L. DeLauro

Jim Langevin

Lucille Roybal-Allard

Mike G. Smith

Peter Agler CA-31

Richard M. Adams MA-08

Raul Ruiz CA-36

Mark Johnson CA-41

Dina Titus

John Curry - DE-AL  
11-01

Jan Schakowsky IL-9

Louise Slaughter NY-25

Tommy Green

William (B) Wood

Tim Ryan OH-17

Joe Lopez Calif 19

Scott R CA-52

Mark G NY-8

James E. Clyburn

Samuel W. Boring

Judy Chu CA-27

Evel Blum

Juan Vargas CA-51

Jeff Sessions

Andrés J. Serrano CA-38

John Shimkus

Tammy Duckworth

Fredena J Wilson

Debbie Dingell

L Lewis

Aim M. Fane Fuster

Jim Lewis

Kent Schuler

Dana DeBette

Air Van Vollen

Elizabeth H. Esty

Patrick Murphy

Jim Swalmell

Mike Doyle

David Price

Rach. Hartvig

Brian M. Thompson

Wm. Larry Clay

Dennis Hays

John Hall

John Hall

John Hall PA1

John Hall

John Hall

Jim McDermott

Tom J. May

Sam Farr

Bill Zoster

Sam

Brenda Lawrence

Sandy Levin

Bobby Cott

Rich Collier

Michael E. Crym

Art Helt

Julia

Walter

Tony Cardenas

Al

Janet

Niki Vargas

Lyle Oliver

Elizabeth C. Canning

Cecily B. Maloney

Peter Wald

Marria L. Judge

Erick L. Enge

Hayl Doynt

Jon May

Ed. Pitt

(5/2/17)

Dear President Donald Trump:

My name is Moustafa Kasem, a 52 year old and father of two from your home state, New York.

I write to you today from an Egyptian prison cell urging you to call for my release and the nineteen other American citizens languishing in Egypt's prisons.

Mr. President, I have been charged in a mass trial with 700 other defendants known to have been arrested after the dispersal of the anti-coup protests in Egypt. I, however was not part of these protests but was just on my way home two miles away from the protests when I was stopped by security officials. I then proceeded to show my American passport as a form of identification. As result, the security officers then beat and



arrested me.

Mr. President, during my four years of being unjustly imprisoned I have been tortured many times beyond recognition. I would often refuse the rare family visits to not have my loved ones worry. With the never ending postponements of our trial, I don't know what the fate is of my future and when and if I will be reunited with my children back in New York.

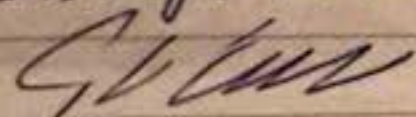
Mr. President, all I long for is to be reunited with my children back in New York. I long to sit together on these cold winter nights, huddled around a fireplace drinking on some warm hot chocolate with marshmallows. With each day that passes, I dream of our reunion that is many times interrupted with the grim reality of my

prison cell and screams of torture in a faint distance.

Mr. President, I urge you to prove to the same soldiers who ridiculed my passport and American citizenship, that in fact, you will put Americans first.

Sincerely,

Moustafa K Kasseh



Jan 17/2018

# Congress of the United States

Washington, DC 20515

March 9, 2018

Michael D. Cohen, Esq.  
c/o Stephen M. Ryan, Esq.  
McDermott Will & Emery  
The McDermott Building  
500 North Capitol Street, NW  
Washington, DC 20001

Marc E. Kasowitz, Esq.  
Kasowitz Benson Torres  
1633 Broadway  
New York, NY 10019

Mr. David J. Pecker  
Chairman, President & Chief Executive Officer  
American Media, Inc.  
4 New York Plaza  
New York, NY 10004

Dear Messrs. Cohen, Kasowitz, and Pecker:

We write to you to follow up on a series of recent revelations concerning payments made to Stephanie Clifford, a former adult-film star known as Stormy Daniels; Karen McDougal, a former Playboy “Playmate of the Year”; and potentially others in an effort to avoid disclosures of their relationships with Donald Trump. We can assure you we have no interest in Mr. Trump’s personal relationships in and of themselves. However, as the senior Democratic leadership of the House Judiciary Committee and leadership of the Democratic Women’s Working Group, we believe we have an obligation to inquire regarding such matters to the extent they raise questions relating to possible violations of law. These matters raise questions relating to potential violations of federal campaign finance and income tax laws, legal ethics and other laws; bear upon the credibility of Mr. Trump’s denials of past non-consensual sexual misconduct; and may pose risks of future efforts to extort or otherwise influence the President in his official capacity.

Given ongoing developments, including a series of disclosures concerning the potentially unlawful payment of “hush money” to Ms. Clifford in connection with a Nondisclosure Agreement involving Mr. Trump and Ms. Daniels -- culminating in the recent admission by Mr. Trump’s private attorney, Michael Cohen, that he facilitated the payment of \$130,000 to her, his obtaining a restraining order to silence Ms. Clifford, and the filing of a lawsuit by Ms. Clifford to invalidate the Nondisclosure Agreement -- and the report last month in *The New Yorker* that

American Media, Inc. (AMI) made a payment of \$150,000 in August 2016 to Karen McDougal, which had the effect of preventing her from publicly describing her own affair with Mr. Trump;<sup>1</sup> we believe it is critical that Members of Congress receive answers regarding these matters.

Over the last several weeks, the following circumstances have been disclosed with respect to the \$130,000 payment made to Ms. Clifford:

- On January 12, 2018, *The Wall Street Journal* reported that a \$130,000 payment had been made to Ms. Clifford through Mr. Cohen.<sup>2</sup> In response, Mr. Cohen did not address the payment, but said of the alleged sexual encounter with Ms. Clifford that “President Trump once again vehemently denies any such occurrence” and that “Your’re [sic] obsessive drive to prove a false narrative, one that has been rebuked by all parties, must come to an end.”<sup>3</sup> Mr. Cohen sent *The Wall Street Journal* a statement signed by Ms. Clifford purportedly denying she had “a sexual and/or romantic affair” with Mr. Trump or that she received “hush money.”<sup>4</sup>
- Notwithstanding Mr. Cohen’s denials, we also learned in January that Ms. Clifford had previously disclosed in an unpublished 2011 interview with *In Touch* magazine<sup>5</sup> that she had a sexual encounter with Mr. Trump which took place after they met at a July 2006 Lake Tahoe golf tournament and that their relationship continued for an 11-month period.<sup>6</sup> In January, the Associated Press reported that *In Touch* did not publish the story after Mr. Cohen threatened aggressive legal action.<sup>7</sup> Another media outlet, TheDirty.com, also briefly posted a story based on information provided to it by Ms. Clifford, but the website’s founder, Nik Richie, took it down the following day after Ms. Clifford’s then-attorney, Keith Davidson, threatened legal action.<sup>8</sup>
- It was also disclosed in January that in a series of phone conversations and text messages that occurred between August 2016 through October 2016, Ms. Clifford told Jacob Weisberg, the Chairman and Editor-in-Chief of The Slate Group, that Mr. Trump had

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<sup>1</sup> Ronan Farrow, *A Playboy Model, and a System for Concealing Infidelity*, NEW YORKER, Feb. 16, 2018.

<sup>2</sup> Michael Rothfeld & Joe Palazzolo, *Trump Lawyer Arranged \$130,000 Payment for Adult-Film Star’s Silence*, WALL. ST. J., Jan. 12, 2018, 3:13 PM.

<sup>3</sup> Aaron Blake, *Did Trump’s Lawyer Just Implicate Trump in the Stormy Daniels Payment?*, WASH. POST, Feb. 14, 2018; Michael Rothfeld & Joe Palazzolo, *Trump Lawyer Arranged \$130,000 Payment for Adult-Film Star’s Silence*, WALL. ST. J., Jan. 12, 2018, 3:13 PM; see Megan Twohey & Jim Rutenberg, *Porn Star Was Reportedly Paid To Stay Quiet About Trump*, N.Y. TIMES, Jan. 12, 2018.

<sup>4</sup> Joe Palazzolo & Michael Rothfeld, *Trump Lawyer Used Private Company, Pseudonyms To Pay Porn Star ‘Stormy Daniels,’* WALL. ST. J., Jan. 18, 2018, 5:48 PM.

<sup>5</sup> Paul Farhi, *In Touch Publishes 2011 Interview with Porn Star Who Says She Had an Affair with Trump*, WASH. POST, Jan. 19, 2018.

<sup>6</sup> *Id.*; Michael Rothfeld & Joe Palazzolo, *Trump Lawyer Arranged \$130,000 Payment for Adult-Film Star’s Silence*, WALL. ST. J., Jan. 12, 2018, 3:13 PM.

<sup>7</sup> Jake Pearson & Jeff Horwitz, *Porn Star Who Alleged Trump Affair: I Can Now Tell My Story*, Assoc. Press, Feb. 15, 2018; Jake Pearson, *Tabloid Held Porn Star’s 2011 Interview After Trump Threat*, Assoc. Press, Jan. 19, 2018, 5:48 PM.

<sup>8</sup> Jim Rutenberg *et al.*, *Tools of Trump’s Fixer: Tough Talk, Hush Money and the Tabloids*, N.Y. TIMES, Feb. 19, 2018, at A1.

“negotiated to buy her silence.”<sup>9</sup> According to Mr. Weisberg, Ms. Clifford said that “she and Trump had worked out an agreement for the presidential candidate to pay her a six-figure sum to keep quiet. More specifically, she said Keith Davidson, a Beverly Hills-based attorney who specializes in claims against celebrities, had worked out the terms with Trump’s lawyer Michael Cohen.”<sup>10</sup>

- After negotiations regarding the Nondisclosure Agreement and payment stalled, Ms. Clifford reached out in the weeks before the 2016 presidential election to possible media outlets, including *Slate*, ABC’s *Good Morning America*, and the *Daily Beast*, to determine whether she could be compensated by them for her story in lieu of being paid for her silence.<sup>11</sup>
- On October 8, 2016, a previously unaired *Access Hollywood* television program from 2005 during which Mr. Trump made comments about engaging in inappropriate sexual conduct with women was made public.<sup>12</sup> In response, various women came forward to disclose their past sexual encounters with Mr. Trump.<sup>13</sup> Likewise, at around that same period, Ms. Clifford sought to “share details concerning her relationship and encounters with Mr. Trump with various media outlets.”<sup>14</sup>
- After learning of Ms. Clifford’s efforts to publicly disclose her affair with Mr. Trump, Ms. Clifford states that “Mr. Trump, with the assistance of his attorney, Mr. Cohen aggressively sought to silence Ms. Clifford as part of an effort to avoid her telling the truth, thus helping to ensure he won the Presidential Election.”<sup>15</sup> Mr. Cohen subsequently drafted the Nondisclosure Agreement, pursuant to which Ms. Clifford would receive \$130,000 for her silence.<sup>16</sup> The Nondisclosure Agreement used aliases to refer to Ms. Clifford and Mr. Trump. Ms. Clifford was referred to as “Peggy Paterson” or “PP” and Mr. Trump was referred to as “David Dennison” or “DD”.<sup>17</sup>

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<sup>9</sup> Jacob Weisberg, *Stormy’s Story: Did Donald Trump Pay a Porn Star To Keep Quiet About an Affair?*, SLATE, Jan. 16, 2018, 10:10 AM.

<sup>10</sup> *Id.*; see Michael Rothfeld & Joe Palazzolo, *Trump Lawyer Arranged \$130,000 Payment for Adult-Film Star’s Silence*, WALL. ST. J., Jan. 12, 2018, 3:13 PM.

<sup>11</sup> Joe Palazzolo & Michael Rothfeld, *Trump Lawyer Used Private Company, Pseudonyms To Pay Porn Star ‘Stormy Daniels’*, WALL ST. J., Jan. 18, 2018, 5:48 PM; Marlow Stern & Aurora Snow, *Porn Star: Donald Trump and Stormy Daniels Invited Me to Their Hotel Room*, Daily Beast, Jan. 12, 2018, 7:00 PM.

<sup>12</sup> *Transcript: Donald Trump’s Taped Comments About Women*, N.Y. TIMES, Oct. 8, 2016.

<sup>13</sup> See, e.g., Eliza Relman, *The 22 Women Who Have Accused Trump of Sexual Misconduct*, BUSINESS INSIDER, Dec. 21, 2017, 9:00 AM.

<sup>14</sup> Complaint for Declaratory Relief, *Clifford v. Trump et al.*, No. BC696568 (Sup. Ct. Cal. Los Angeles Coty Mar. 6, 2018), at 2 [hereinafter Complaint].

<sup>15</sup> *Id.*

<sup>16</sup> *Id.*

<sup>17</sup> *Id.* at 3; Exhibit 1.

- Mr. Cohen, in order to facilitate the \$130,000 payment to Ms. Clifford, established Resolution Consultants LLC, a limited liability company under Delaware law on September 30, 2016, and named himself as the company’s authorized person.<sup>18</sup>
- In October 2016, Mr. Cohen missed two deadlines to make the \$130,000 payment to Ms. Clifford “because he couldn’t reach Mr. Trump in the hectic final days of the presidential campaign,” according to a recent report by *The Wall Street Journal*.<sup>19</sup> Then, on October 17, 2016, Mr. Davidson, sent an email to Mr. Cohen threatening to cancel the Nondisclosure Agreement by the end of the day and later sent a second email advising that Ms. Clifford “deems her settlement agreement canceled and void.”<sup>20</sup> That same day, Mr. Cohen established Essential Consultants, LLC, a limited liability company under Delaware law and designated himself as its authorized person.<sup>21</sup> Two minutes later, Mr. Cohen dissolved Resolution Consultants.<sup>22</sup>
- Ms. Clifford has asserted Essential Consultants, LLC “was created by Mr. Cohen with Mr. Trump’s knowledge for one purpose – to hide the true source of funds to be used to pay Ms. Clifford, thus further insulating Mr. Trump from later discovery and scrutiny.”<sup>23</sup>
- Mr. Cohen used a bank account at First Republic Bank linked to Essential Consultants, LLC to wire the \$130,000 to Mr. Davidson’s client trust account at City National Bank, less than two weeks before the presidential election.<sup>24</sup>
- On October 28, 2016, the Nondisclosure Agreement was signed by Ms. Clifford on her own behalf and by Mr. Cohen on behalf of Essential Consultants, LLC. Although the Nondisclosure Agreement provided for a signature for “DD”, no such signature was affixed to the document.<sup>25</sup> Among other things, the Nondisclosure Agreement includes a recital whereby Ms. Clifford claims “that she has been damaged by [Mr. Trump’s] alleged actions against her, including but not limited to tort claims proximately causing injury to her person.”<sup>26</sup>

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<sup>18</sup> Certificate of Formation for Resolution Consultants LLC, File No. 6168356, Secretary of State, State of Delaware (Sept. 30, 2016); see Joe Palazzolo & Michael Rothfeld, *Trump Lawyer Used Private Company, Pseudonyms To Pay Porn Star ‘Stormy Daniels’*, WALL ST. J., Jan. 18, 2018, 5:48 PM.

<sup>19</sup> Joe Palazzolo & Michael Rothfeld, *Trump Lawyer’s Payment to Porn Star Was Reported as Suspicious by Bank*, WALL ST. J., Mar. 5, 2018, 1:17 PM.

<sup>20</sup> Beth Reinhard, Frances Stead Sellers & Emma Brown, *Days Before the Election, Stormy Daniels Threatened To Cancel Deal To Keep Alleged Affair with Trump Secret*, WASH. POST, Mar. 2, 2018 (quoting from an email from Mr. Davidson to Mr. Cohen).

<sup>21</sup> Certificate of Formation for Essential Consultants LLC, File No. 6185135, Secretary of State, State of Delaware (Oct. 17, 2016); see Joe Palazzolo & Michael Rothfeld, *Trump Lawyer Used Private Company, Pseudonyms To Pay Porn Star ‘Stormy Daniels’*, WALL ST. J., Jan. 18, 2018, 5:48 PM.

<sup>22</sup> Joe Palazzolo & Michael Rothfeld, *Trump Lawyer Used Private Company, Pseudonyms To Pay Porn Star ‘Stormy Daniels’*, WALL ST. J., Jan. 18, 2018, 5:48 PM.

<sup>23</sup> Complaint at 3.

<sup>24</sup> Joe Palazzolo & Michael Rothfeld, *Trump Lawyer’s Payment to Porn Star Was Reported as Suspicious by Bank*, WALL ST. J., Mar. 5, 2018, 1:17 PM; Joe Palazzolo & Michael Rothfeld, *Trump Lawyer Used Private Company, Pseudonyms To Pay Porn Star ‘Stormy Daniels’*, WALL ST. J., Jan. 18, 2018, 5:48 PM.

<sup>25</sup> *Id.* at 3; Exhibit 1.

<sup>26</sup> *Id.* at Exhibit 1.

- Thereafter, Ms. Clifford ceased in her efforts to have her story published in return for compensation. For example, although Ms. Clifford had been in “protracted talks” with the *Daily Beast* about arranging an interview, “[s]he ultimately backed out on Nov. 3, just five days before the 2016 election.”<sup>27</sup>
- In September 2017, City National Bank asked Mr. Davidson about the source of the \$130,000 wire transfer payment to his client trust account.<sup>28</sup> First Republic Bank, from which Mr. Cohen made the wire transfer “flagged the transaction as suspicious and reported it to the Treasury Department.”<sup>29</sup>
- After certain details regarding Ms. Clifford’s affair with Mr. Trump and the efforts by Mr. Cohen to obtain Ms. Clifford’s silence were reported by the media, including *The Wall Street Journal*,<sup>30</sup> Mr. Cohen, as previously noted, sent *The Wall Street Journal* a statement signed by Ms. Clifford purportedly denying she had “a sexual and/or romantic affair” with Mr. Trump or that she received “hush money.”<sup>31</sup>
- On February 13, 2018, Mr. Cohen informed *The New York Times* that he used his own private funds to “facilitate” the payment of the \$130,000 to Ms. Clifford,<sup>32</sup> although he has declined to answer questions about whether Mr. Trump reimbursed him for the \$130,000 payment.<sup>33</sup> *The Wall Street Journal* reported on March 5, 2018 that after Mr. Trump won the presidential election, “Mr. Cohen complained to friends that he had yet to be reimbursed for the payment to Ms. Clifford.”<sup>34</sup>
- On February 27, 2018, Mr. Cohen obtained a restraining order from a private arbitrator designed to silence Ms. Clifford.<sup>35</sup> Ms. Clifford’s attorney, Mr. Avenatti, subsequently

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<sup>27</sup>Marlow Stern & Aurora Snow, *Porn Star: Donald Trump and Stormy Daniels Invited Me to Their Hotel Room*, *Daily Beast*, Jan. 12, 2018, 7:00 PM.

<sup>28</sup>Beth Reinhard, Frances Stead Sellers & Emma Brown, *Days Before the Election, Stormy Daniels Threatened To Cancel Deal To Keep Alleged Affair with Trump Secret*, *WASH. POST*, Mar. 2, 2018.

<sup>29</sup>Joe Palazzolo & Michael Rothfeld, *Trump Lawyer’s Payment to Porn Star Was Reported as Suspicious by Bank*, *WALL ST. J.*, Mar. 5, 2018, 1:17 PM.

<sup>30</sup>See, e.g., Michael Rothfeld & Joe Palazzolo, *Trump Lawyer Arranged \$130,000 Payment for Adult-Film Star’s Silence*, *WALL. ST. J.*, Jan. 12, 2018, 3:13 PM; Megan Twohey & Jim Rutenberg, *Porn Star Was Reportedly Paid To Stay Quiet About Trump*, *N.Y. TIMES*, Jan. 12, 2018.

<sup>31</sup>Joe Palazzolo & Michael Rothfeld, *Trump Lawyer Used Private Company, Pseudonyms To Pay Porn Star ‘Stormy Daniels,’* *WALL ST. J.*, Jan. 18, 2018, 5:48 PM.

<sup>32</sup>Maggie Haberman, *Michael D. Cohen, Trump’s Longtime Lawyer, Says He Paid Stormy Daniels Out of His Own Pocket*, *N.Y. TIMES*, Feb. 13, 2018; Tarini Parti, *Buzzfeed Twitter*, Feb. 13, 2018, 8:02 PM.

<sup>33</sup>Joe Palazzolo & Michael Rothfeld, *Trump Lawyer’s Payment to Porn Star Was Reported as Suspicious by Bank*, *WALL ST. J.*, Mar. 5, 2018, 1:17 PM.

<sup>34</sup>*Id.*

<sup>35</sup>Jim Rutenberg & Peter Baker, *Trump Lawyer Obtained Restraining order to Silence Stormy Daniels*, *N.Y. Times*, March 7, 2018.

described the order as being “completely bogus,” because there was “no hearings, no notice to Ms. Clifford, no opportunity to respond, and no decision on the merits.”<sup>36</sup>

- On March 6, 2018, Ms. Clifford brought a legal action through her current attorney, Michael J. Avenatti, against Mr. Trump and Essential Consultants, LLC seeking a declaration that the Nondisclosure Agreement (which was included as part of the lawsuit) was invalid due to Mr. Trump’s failure to execute it. Among other things, Ms. Clifford asserts that: (i) “Mr. Cohen, through intimidation and coercive tactics, forced Ms. Clifford into signing a false statement” [regarding] . . . her relationship with Mr. Trump”;<sup>37</sup> (ii) confirmed that Ms. Clifford did have an “intimate relationship with Mr. Trump”;<sup>38</sup> (iii) Mr. Cohen is engaged in an ongoing effort “to intimidate Ms. Clifford into silence and ‘shut her up’ in order to ‘protect Mr. Trump;”<sup>39</sup> and (iv) Mr. Trump was involved in these efforts (“there can be no doubt that Mr. Trump *at all times* has been fully aware of the negotiations with Ms. Clifford, the existence of and terms of the Hush Agreement, the payment of the \$130,000.00, the use of EC [Essential Consultants, LLC] as a conduit, and the recent attempts to intimidate and silence Ms. Clifford by way of the bogus arbitration proceeding.”).<sup>40</sup>
- On March 8, 2018, White House Press Secretary Sarah Sanders acknowledged that President Trump had knowledge of the recent restraining order involving Ms. Clifford stating, “I have had conversations with the president about this and as I outlined earlier, this case had already been won in arbitration.”<sup>41</sup>

And, this is not the only documented instance of supposed “hush money” being used to prevent disclosures of alleged extramarital affairs involving Mr. Trump:

- In July 2016, according to *The Wall Street Journal*, former 1998 Playboy Playmate of the Year Karen McDougal was in discussions with producers at NBC News about her own extramarital affair with Mr. Trump that began in 2006.<sup>42</sup> Ultimately, however, she entered into a contractual agreement with AMI, which owns the *National Enquirer*. Pursuant to that August 5, 2016 contract,<sup>43</sup> AMI paid Ms. McDougal \$150,000. It is widely understood that AMI’s chairman, David Pecker, is a friend and political supporter of Mr. Trump, and is also close friends with Mr. Cohen.<sup>44</sup>

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<sup>36</sup> Joe Palazzolo, Michael Rothfeld & Lukas I. Alpert, *National Enquirer Shielded Donald Trump From Playboy Model’s Affair Allegation*, WALL ST. J., Nov. 4, 2016.

<sup>37</sup> Complaint at 4.

<sup>38</sup> *Id.* at 5.

<sup>39</sup> *Id.*

<sup>40</sup> *Id.*

<sup>41</sup> Sarah Fitzpatrick, Trump Lawyer Michael Cohen Tries to Silence Adult Film Star Stormy Daniels, NBC News (Mar. 8, 2018, 12:21 PM).

<sup>42</sup> Joe Palazzolo, Michael Rothfeld & Lukas I. Alpert, *National Enquirer Shielded Donald Trump From Playboy Model’s Affair Allegation*, WALL ST. J., Nov. 4, 2016.

<sup>43</sup> Ronan Farrow, *A Playboy Model, and a System for Concealing Infidelity*, NEW YORKER, Feb. 16, 2018; see Jim Rutenberg *et al.*, *Tools of Trump’s Fixer: Tough Talk, Hush Money and the Tabloids*, N.Y. TIMES, Feb. 19, 2018, at A1.

<sup>44</sup> See, e.g., *id.*; Joe Palazzolo, Michael Rothfeld & Lukas I. Alpert, *National Enquirer Shielded Donald Trump From Playboy Model’s Affair Allegation*, WALL ST. J., Nov. 4, 2016 (“Since last year, the Enquirer has supported



- The contract gave AMI exclusive rights to Ms. McDougal’s story in perpetuity, but did not require the company to publish it. The *Enquirer* never published the story, even though she expected it would be published, according to individuals familiar with these matters.<sup>45</sup> During her negotiations with AMI, Ms. McDougal was also represented by Keith Davidson, whose retainer agreement pertained to “claims against Donald Trump and or assisting client in negotiating a confidentiality agreement and/or life rights related to interactions with Donald Trump and/or negotiating assignment of exclusive press opportunities regarding same.”<sup>46</sup>
- Regarding AMI’s agreement to pay Ms. McDougal \$150,000, Hope Hicks, a Trump Campaign spokeswoman (and former White House Director of Communications), said, “We have no knowledge of any of this” and that Ms. McDougal’s claim of an affair with Mr. Trump was “totally untrue.”<sup>47</sup>
- As noted above, on February 16, 2018, *The New Yorker* published an article that confirmed and expounded upon these payments and Ms. McDougal’s nine-month romantic relationship with Mr. Trump. Among other things, the writer, Ronan Farrow, based on interviews with Ms. McDougal and other sources, reported that: (i) Ms. McDougal had memorialized her affair with Mr. Trump in an eight-page handwritten document; (ii) Mr. Trump initially attempted to pay Ms. McDougal after their first romantic liaison and was careful to avoid directly paying for her travel (“‘No paper trails for him,’ she wrote”), but that he arranged for her to be reimbursed (“‘every time I flew to meet him, I booked/paid for flight + hotel + he reimbursed me’”); (iii) six former AMI employees stated that the payments to Ms. McDougal were part of a pattern of so-called “catch-and-kill” arrangements (“‘We had stories and we bought them knowing full well they were never going to run,’” according to Jerry George, a former AMI senior editor, who added, “‘Pecker really considered [Mr. Trump] a friend. We never printed a word about Trump without his approval.’”); (iv) Mr. Pecker’s use of these catch-and-kill arrangements to bury stories about Mr. Trump could provide Mr. Pecker significant leverage in terms of his relationship with Mr. Trump (according to a former AMI employee, Maxine Page, the existence of these catch-and-kill arrangements by AMI involving Mr. Trump is “‘a cause of concern. In theory, you would think that Trump has all the power in that relationship, but in fact Pecker has the power—he has the power to run these stories. He knows where the bodies are buried.’”); and (v) AMI’s interest in Ms. McDougal “seemed to increase” after news broke last January of Mr. Trump’s affair with Ms. Clifford, with the media firm sending her emails about contract extensions, media training, and offers to host Emmy coverage.<sup>48</sup>

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Mr. Trump’s presidential bid, endorsing him and publishing negative articles about some of his opponents. In a written statement, Mr. Pecker said that it is no secret that he and Mr. Trump are friends and that he greatly admires him.”).

<sup>45</sup> Joe Palazzolo, Michael Rothfeld & Lukas I. Alpert, *National Enquirer Shielded Donald Trump From Playboy Model’s Affair Allegation*, WALL ST. J., Nov. 4, 2016.

<sup>46</sup> *Id.*

<sup>47</sup> *Id.*

<sup>48</sup> Ronan Farrow, *A Playboy Model, and a System for Concealing Infidelity*, NEW YORKER, Feb. 16, 2018.

- On February 19, 2018, *The New York Times* reported that Mr. Cohen was also apprised by AMI of its efforts to ensure that Ms. McDougal’s involvement with Mr. Trump was not made public: “In the summer of 2016, American Media came to Mr. Cohen with a story involving Ms. McDougal . . . [and her claim] to have had a consensual affair with Mr. Trump in the mid-2000’s.” Shortly after Ms. McDougal signed the agreement with AMI on August 5, 2016, Ms. McDougal’s attorney, Keith Davidson, sent an email to Mr. Cohen and confirmed to him over the phone that the transaction had been completed.<sup>49</sup>
- Mr. Cohen also sent other catch-and-kill stories to AMI. According to *The New York Times*, in July 2015, he was contacted by “Jeremy Frommer, a hedge-fund manager turned digital entrepreneur, who had obtained photos of Mr. Trump appearing to autograph the breasts of a topless woman from the estate of Bob Guggione, the founder of Penthouse Magazine.”<sup>50</sup> After some discussion, it was agreed that Mr. Frommer would take the incriminating photos to David Pecker at AMI, while Messrs. Cohen and Pecker simultaneously (and by some appearances, in exchange therefore) discussed business opportunities that could benefit Mr. Frommer’s media company. AMI ended up never publishing the photographs, and, as recently reported by the *Times*, in early 2016 “when the negotiations between AMI and Mr. Frommer began, they were intended to suppress the photos, part of broader efforts by American Media to ‘catch and kill’ information that would damage Mr. Trump.”<sup>51</sup> Mr. Cohen recently confirmed to the *Times* that he had directed that Mr. Frommer take the photographs to AMI.<sup>52</sup>
- The “hush money” payments and benefits to Ms. Clifford and Ms. McDougal and others appear not to be isolated occurrences. It is reported that Steve Bannon, former White House Chief Strategist and CEO of the Trump Campaign, said the Trump Campaign routinely paid sums of money to women in exchange for their silence regarding their interactions with Mr. Trump. Mr. Bannon said, “‘Kasowitz on the campaign—what did we have, a hundred women? Kasowitz took care of all of them.’”<sup>53</sup>

What may be even more troubling than the apparent serial use of “hush money” to prevent disclosure of potentially incriminating information is Mr. Trump’s pattern of denying any involvement with regard to a range of credible charges of non-consensual sexual misconduct:

- As noted above, on October 8, 2016, a previously unaired 2005 video from the television program *Access Hollywood* was made public in which Mr. Trump made comments about

<sup>49</sup> Jim Rutenberg *et al.*, *Tools of Trump’s Fixer: Tough Talk, Hush Money and the Tabloids*, N.Y. TIMES, Feb. 19, 2018, at A1.

<sup>50</sup> *Id.*

<sup>51</sup> *Id.*

<sup>52</sup> *Id.*

<sup>53</sup> Eliza Relman, *Steve Bannon Suggests Trump’s Lawyer ‘Took Care’ of ‘a Hundred’ Women During the Presidential Campaign*, BUSINESS INSIDER, Jan. 12, 2018, 5:42 PM (quoting from FIRE AND FURY: INSIDE THE TRUMP WHITE HOUSE); *see also* Marc E. Kasowitz, Kasowitz Benson Torres, (last visited Jan. 26, 2018) (noting that Mr. Kasowitz is a New York attorney, whose law firm states that he has represented Mr. Trump “in a wide range of litigation matters for over 15 years”).

engaging in inappropriate sexual conduct with women. In particular, when referring to kissing women and grabbing them by their genitals without their consent, Mr. Trump stated: “You know, I’m automatically attracted to beautiful [women] -- I just start kissing them. It’s like a magnet. Just kiss. I don’t even wait. And when you’re a star, they let you do it. You can do anything. . . . Grab ’em by the pussy. You can do anything.”<sup>54</sup>

- Following the release of that video, at least 19 women have come forward to accuse Mr. Trump of sexual misconduct.<sup>55</sup> For example, Jessica Drake, an adult-film star, alleged Mr. Trump, while in his pajamas, hugged and kissed her and two other women without permission in his hotel suite after a July 2006 celebrity golf tournament in Lake Tahoe.<sup>56</sup> Ms. Drake also stated that Mr. Trump offered her \$10,000 and the use of his private jet in exchange for sex, an offer that she rejected.<sup>57</sup> (Ms. Drake, who also goes by the name “Angel Ryan,” was listed in the Nondisclosure Agreement involving Ms. Clifford as being one of four individuals who had previously been made aware of Ms. Clifford’s romantic relationship with Mr. Trump.) In addition, at least six former beauty pageant contestants claimed that Mr. Trump walked into their pageant changing rooms and observed them in various stages of undress or touched them inappropriately.<sup>58</sup>
- In some instances, women involved in allegations of non-consensual sexual misconduct, faced denials manufactured by Mr. Cohen. Thus, according to *The New York Times*, in early 2016 after a legal affairs website<sup>59</sup> identified court documents by which Jill Harth, a female former business partner of Mr. Trump, accused him of sexual misconduct, Mr. Cohen issued a statement indicating that Ms. Harth “‘would acknowledge’ that the story was false.” However, Ms. Harth has stated that she did not authorize any such statement and stands by her claims of misconduct against the President.<sup>60</sup> (Ms. Harth is one of the women who have accused Mr. Trump of sexual misconduct.<sup>61</sup>)
- During a campaign rally in October 2016, Mr. Trump said, “‘Every woman lied when they came forward to hurt my campaign. . . . Total fabrication. The events never happened. Never. All of these liars will be sued after the election is over.’”<sup>62</sup> On November 17, 2017, White House Press Secretary Sarah Huckabee, when asked by a

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<sup>54</sup> Transcript: *Donald Trump’s Taped Comments About Women*, N.Y. TIMES, Oct. 8, 2016.

<sup>55</sup> See, e.g., Eliza Relman, *The 22 Women Who Have Accused Trump of Sexual Misconduct*, BUSINESS INSIDER, Dec. 21, 2017, 9:00 AM.

<sup>56</sup> See, e.g., Nancy Dillon & Larry McShane, *Porn Star Jessica Drake Claims Donald Trump Offered Her \$10G, Use of His Private Jet for Sex*, N.Y. DAILY NEWS, Oct. 23, 2016, 6:46 AM.

<sup>57</sup> *Id.*

<sup>58</sup> Eliza Relman, *The 22 Women Who Have Accused Trump of Sexual Misconduct*, BUSINESS INSIDER, Dec. 21, 2017, 9:00 AM; see, e.g., Harper Neidig, *Report: Trump Walked into Teen Beauty Pageant Changing Room*, THE HILL, Oct. 12, 2016, 7:54 AM.

<sup>59</sup> Rachel Stockman, *Exclusive: Inside the \$125 Million Donald Trump Sexual Assault Lawsuit*, LAW & CRIME, Feb. 23, 2016, 3:40 PM.

<sup>60</sup> Jim Rutenberg et al., *Tools of Trump’s Fixer: Tough Talk, Hush Money and the Tabloids*, N.Y. TIMES, Feb. 19, 2018, at A1.

<sup>61</sup> See, e.g., Matt Ford, *The 19 Women Who Accused President Trump of Sexual Misconduct*, THE ATLANTIC, Dec. 7, 2017.

<sup>62</sup> Joe Concha, *CBS’s Major Garrett: Why Hasn’t Trump Sued His Sexual Misconduct Accusers?*, THE HILL, Nov. 17, 2017.

CBS news correspondent why President Trump had not sued the women he called liars, she said, “I haven’t asked him that question. . . . I’d have to ask him and let you know why he hasn’t chosen to take that path.”<sup>63</sup>

These events present several critical legislative and oversight concerns to us, including possible campaign finance, tax, legal ethics and other legal violations, raise serious doubts about the credibility of President Trump’s repeated denials of sexual misconduct, and pose risks of future efforts to extort or otherwise improperly influence the President:

*Possible Campaign Finance and other Legal Violations:* The payment of \$130,000 that Mr. Cohen facilitated through Essential Consultants, LLC to Ms. Clifford in October 2016 less than two weeks before the election may constitute an unlawful unreported in-kind contribution to the Trump campaign, or, alternatively, an unreported campaign expenditure paid for the purpose of influencing the presidential election.<sup>64</sup> For example, the American Bridge 21<sup>st</sup> Century Foundation, in its complaint filed with the Federal Election Commission (FEC), alleges that had Mr. Trump been interested in protecting his reputation, he could have obtained Ms. Clifford’s silence in 2011, when she initially spoke with the media about her alleged affair. Instead, Mr. Cohen waited until just before the presidential election when Mr. Trump faced the prospect of negative news coverage surfacing about this affair.<sup>65</sup> In addition, depending on the ultimate source of the payments, the Trump campaign may have also unlawfully received a corporate contribution.<sup>66</sup> The foregoing restrictions are criminal in nature and subject to a fine or up to five years imprisonment.<sup>67</sup>

Similarly, AMI’s \$150,000 payment to Ms. McDougal also may constitute a prohibited in-kind contribution or unreported expenditure made for the purpose of influencing the 2016 presidential election.<sup>68</sup> For instance, Free Speech for People, in its FEC complaint against the Trump campaign with regard to this payment, alleges that this expenditure was “‘coordinated’ with a candidate as an in-kind contribution to the candidate and must be reported as a contribution to and expenditure by that candidate’s authorized committee.”<sup>69</sup> The law defines “coordinated” as meaning “made in cooperation, consultation or concert with, or at the request or suggestion of, a candidate, a candidate’s authorized committee, or a political party committee.”<sup>70</sup>

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<sup>63</sup> *Id.*

<sup>64</sup> See 52 U.S.C. § 30104(b) (2018); see, e.g., Supplemental Complaint by American Bridge 21<sup>st</sup> Century Foundation v. Donald J. Trump *et al.*, Mur. No. \_\_\_, Federal Election Commission (Feb. 15, 2018); Complaint by American Bridge 21<sup>st</sup> Century Foundation v. Donald J. Trump *et al.*, Mur. No. \_\_\_, Federal Election Commission (Feb. 12, 2018); Complaint by Common Cause & Paul S. Ryan v. Donald J. Trump for President, Inc. & The Trump Organization, Mur. No. \_\_\_, Federal Election Commission (Jan. 22, 2018).

<sup>65</sup> Complaint by American Bridge 21<sup>st</sup> Century Foundation v. Donald J. Trump *et al.*, Mur. No. \_\_\_, Federal Election Commission (Feb. 12, 2018), at 6.

<sup>66</sup> See 52 U.S.C. § 30118(a) (2018).

<sup>67</sup> 52 U.S.C. § 30109(d) (2018).

<sup>68</sup> See, e.g., Complaint by Common Cause & Paul S. Ryan v. President Donald J. Trump, Donald J. Trump for President, Inc., & America Media, Inc., Mur. No. \_\_\_, Federal Election Commission (Feb. 20, 2018); Complaint by Free Speech for People & Shanna M. Cleveland v. Donald J. Trump for President & America Media, Inc., Mur. No. \_\_\_, Federal Election Commission (Feb. 16, 2018).

<sup>69</sup> Complaint by Free Speech for People & Shanna M. Cleveland v. Donald J. Trump for President & America Media, Inc., Mur. No. \_\_\_, Federal Election Commission (Feb. 16, 2018).

<sup>70</sup> 11 C.F.R. § 109.20 (2018).

(Moreover, any payment or benefit to Mr. Frommer in connection with his providing photos to AMI may also similarly contravene the campaign finance laws.)

These payments and benefits may also violate the federal income tax laws, as it is unlawful to deduct any amount “paid or incurred in connection with . . . participation in, or intervention in, any political campaign on behalf of (or in opposition to) any candidate for public office or . . . any attempt to influence the general public, or segments thereof, with respect to elections.”<sup>71</sup> To the extent Mr. Trump or the Trump Organization may have attempted to treat any travel reimbursements or other payments to Ms. McDougal or others as a business expense, this may also give rise to income tax issues. For example, criminal federal tax law penalties may be imposed for filing a fraudulent or false return, statement or other document.<sup>72</sup>

In addition, although not criminal in nature, the contention that Mr. Trump may not have been involved in or made aware of the Nondisclosure Agreement and that Mr. Cohen used his “own personal funds to facilitate a payment of \$130,000 to Ms. Stephanie Clifford”<sup>73</sup> raises a host of legal ethics issues. Charles Wolfram a professor of legal ethics at Cornell University noted, “The thing seems so weird that it invites an inquiry into what you’re doing. Lawyers don’t go around giving \$130,000 to strangers, benefiting their clients, without billing their clients.”<sup>74</sup> Potentially implicated provisions include Rule 1.4 of the New York State Rules of Professional Conduct which provides that lawyers are required to: “promptly inform their clients of any decisions or circumstances with respect to which the client’s ‘informed consent’” is required including “material developments in the matter including settlement . . . offers.” Rule 1.8 of the New York Rules also prohibits lawyers from lending funds to clients during contemplated or pending litigation, and also requires a written agreement if there is a loan between a lawyer and a client. And Rule 8.4 prohibits lawyers from engaging “in conduct involving dishonesty, fraud, deceit or misrepresentation.”

*Possible Pattern of Misstatements and Cover-ups Concerning Sexual Misconduct:* Misstatements, intentional or otherwise, by President Trump have proven to be commonplace – as of last January, President Trump has reportedly made nearly 2,000 false or misleading claims during his presidency.<sup>75</sup> However, in our view, lying about sexual assault or misconduct is a particularly grievous concern not only because of its reputational damage to the women involved, but because it may be reflective of a general contempt for the rights of women.

Thus, when confronted with allegations of inappropriate non-consensual behavior with women over the course of the 2016 presidential campaign, Mr. Trump repeatedly denied them, just as he and his representatives have previously sought to deny any involvement with, or payments to, Ms. Clifford and Ms. McDougal:

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<sup>71</sup> 26 U.S.C. § 162(e) (2018). Also, the Internal Revenue Code restricts political activities by a tax-exempt entity. 26 U.S.C. §§ 501(c), 527 (2018).

<sup>72</sup> See, e.g., 26 U.S.C. § 7206 (2018).

<sup>73</sup> Tarini Parti, Buzzfeed Twitter, Feb. 13, 2018, 8:02 PM; Maggie Haberman, *Michael D. Cohen, Trump’s Longtime Lawyer, Says He Paid Stormy Daniels Out of His Own Pocket*, N.Y. TIMES, Feb. 13, 2018.

<sup>74</sup> Maggie Haberman & Charlie Savage, *Trump Lawyer’s Payment to Porn Star Raises New Questions*, N.Y. TIMES, Feb. 15, 2018, at A17.

<sup>75</sup> Glenn Kessler, Meg Kelly & Nicole Lewis, *President Trump Has Made 1,950 False or Misleading Claims Over 347 Days*, WASH. POST, Jan. 2, 2018.

- After the *Access Hollywood* video was publicly released, Mr. Trump dismissed his comments as mere “locker room banter, a conversation that took place many years ago.”<sup>76</sup>
- During the second presidential debate on October 8, 2016, Mr. Trump again disavowed the comments he made during the *Access Hollywood* video about kissing women without permission and grabbing their genitals. In response to questioning during the debate about whether he actually had done so, he stated, “No. . . . I have not.”<sup>77</sup>
- The following week, during an interview with *The New York Times* regarding the allegations of Ms. Leeds and Ms. Crooks, two women who accused Mr. Trump of sexual assault, “a highly agitated Mr. Trump” denied the women’s claims, shouting “None of this ever took place.” “He said that the *Times* was making up the allegations to hurt him and that he would sue the news organization if it reported them,” according to the *Times* and told the reporter, “You are a disgusting human being.” “Asked whether he had ever done any of the kissing or groping that he had described on the recording, Mr. Trump was once again insistent: “I don’t do it. I don’t do it. It was locker room talk.”<sup>78</sup>
- On the day following the publication of *The New York Times* story regarding the allegations of the two women, Marc Kasowitz sent letters to the *Times* reporter as well as the *Times* Executive Editor threatening to sue the *Times* if it did not retract the “libelous” article and claiming that it was “reckless, defamatory and constitutes libel per se.”<sup>79</sup> Neither Mr. Kasowitz nor Mr. Trump followed through on their threat to sue *The New York Times* for libel. The one-year statute of limitations for filing such a libel suit under New York law expired on October 12, 2017.<sup>80</sup>
- On the day following the publication of a February 19, 2018 *Washington Post* article reporting on Ms. Crooks’ repeated efforts to call attention to a 2006 incident with Mr. Trump during which she said he forcibly kissed her,<sup>81</sup> President Trump denied knowing the woman and accused the *Washington Post* of publishing “[f]ake” news.<sup>82</sup>

<sup>76</sup> Reena Flores *et al.*, “I Never Said I’m a Perfect Person,” *Trump Says About Lewd Comments*; CBS News, Oct. 8, 2016, 10:58 AM.

<sup>77</sup> Megan Twohey & Michael Barbaro, *Two Women Say Donald Touched Them Inappropriately*, N.Y. TIMES, Oct. 12, 2016; *see* Patrick Healy & Jonathan Martin, *In Second Debate, Donald Trump and Hillary Clinton Spar in Bitter, Personal Terms*, N.Y. TIMES, Oct. 9, 2016.

<sup>78</sup> Megan Twohey & Michael Barbaro, *Two Women Say Donald Touched Them Inappropriately*, N.Y. TIMES, Oct. 12, 2016.

<sup>79</sup> Staci Zaretsky, *Donald Trump’s Biglaw Firm Threatens To Sue New York Times Over Publication of Sexual Assault Allegations*, *Above the Law*, Oct. 13, 2016.

<sup>80</sup> Eriq Gardner, *One Year After Trump’s Pledge to Sue N.Y. Times, He Lets Groping Story Go*, HOLLYWOOD REPORTER, Oct. 11, 2017; Staci Zaretsky, *Donald Trump’s Biglaw Firm Threatens To Sue New York Times Over Publication of Sexual Assault Allegations*, *Above the Law*, Oct. 13, 2016.

<sup>81</sup> Eli Saslow, *Is Anyone Listening? This Trump Accuser Keeps Asking Herself That. But She Plans To Keep Talking About that Day in 2006*, WASH. POST, Feb. 19, 2018.

<sup>82</sup> Tamara Keith, *Trump Denies Woman’s Allegation of Unwanted Kissing in Trump Tower*, Nat’l Pub. Radio, Feb. 20, 2018.

As a result of the foregoing, we are concerned that the misleading statements concerning Mr. Trump's involvement with Ms. Clifford and Ms. McDougal calls into question his denials of any involvement with the 19 or more women who have previously accused him of sexual misconduct.

*Risks of Future Efforts to Extort or Otherwise Influence the President in his Official Capacity:* One of our most profound concerns is that there may exist additional unreported extramarital relationships, catch-and-kill agreements, or other incidents in Mr. Trump's past that could serve as the foundation of an attempt to extort the President, or otherwise influence any official action he might take. As you know, applicants for sensitive national security positions are required to demonstrate that they can protect classified information under a range of guidelines, including sexual misbehavior.<sup>83</sup> Under applicable guidelines, this could include legal activities between consenting adults as well as other activities reflecting lack of judgment or discretion or which may subject an individual to undue influence or coercion.<sup>84</sup> It goes without saying that the President—holding the most sensitive position in the free world—should be held to the highest possible standard in this regard.

Given these collective concerns, we ask that, as relevant, each of you answer the following initial questions:

1. With regard to the October 2016 Nondisclosure Agreement and payment, and February 2018 restraining order involving Ms. Clifford (for Mr. Cohen):
  - a) Please describe the purpose and source of the October 2016 payment of \$130,000 to Ms. Clifford, and whether and when Mr. Trump or anyone in the Trump Campaign or Trump Organization was made aware of this transaction.
  - b) With respect to your statement, "In a private transaction in 2016, I used my own personal funds to facilitate a payment of \$130,000 to Ms. Stephanie Clifford,"<sup>85</sup> please describe what you meant by "personal funds" and "facilitate."
  - c) Please explain how any amount expended by you or Essential Consultants, LLC in this regard was treated for tax purposes.
  - d) With respect to your statement, "[n]either the Trump Organization nor the Trump campaign . . . reimbursed me for the payment, either directly or indirectly"<sup>86</sup> you failed to note whether Mr. Trump himself reimbursed you for the payment. Please inform us if he or any other person or entity has or plans to provide reimbursement, and if so when. Was any payment you or your firm made in this regard as a gift, and if so, for whose benefit was this gift made? Please inform us whether any portion of the payment was a loan, and if so please provide us with copies of any loan documentation and let us know if it was in any way related to possible litigation.

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<sup>83</sup> Adjudicative Guidelines for Determining Eligibility for Access to Classified Information, Guideline D – Sexual Behavior, 32 C.F.R. § 147.6 (2018) (noting that "[se]xual behavior that causes an individual to be vulnerable to coercion, exploitation, or duress" may "raise a security concern").

<sup>84</sup> *Id.*; see, e.g., Jeffrey Bennett, *5 Sexual Behaviors Which Could Result in Clearance Denial*, ClearnaceJobs.com, Aug. 15, 2017.

<sup>85</sup> Tarini Parti, BuzzFeed Twitter, Feb. 13, 2018, 8:02 PM; Maggie Haberman, *Michael D. Cohen, Trump's Longtime Lawyer, Says He Paid Stormy Daniels Out of His Own Pocket*, N.Y. TIMES, Feb. 13, 2018.

<sup>86</sup> *Id.*

- e) With respect to the February 27, 2018 temporary restraining order from an arbitrator concerning Ms. Clifford, please let us know whether and the extent Ms. Clifford received notice and an opportunity to respond to the proceeding, the source of payment for any legal fees or costs relating to this matter and whether and when Mr. Trump was made aware of the proceeding. If Ms. Clifford did not receive notice and an opportunity to be heard, please describe how this squares with President Trump's assertions last month that he supports "due process" with respect to matters of sexual misconduct (particularly given Ms. Clifford's assertion in the Nondisclosure Agreement that Mr. Trump had caused "injury to her person").
2. With regard to payments made by AMI and Mr. Trump to Ms. McDougal (for Messrs. Pecker and Cohen):
- a) Please provide a copy of the final so-called "life-story rights agreement",<sup>87</sup> describe the purpose and source of the payment of \$150,000 to Ms. McDougal, and whether and when Mr. Trump or anyone in the Trump Campaign or Trump Organization, or any attorney or representative thereof, was made aware of this transaction.
  - b) Please explain how any payments by Mr. Trump or others made directly to Ms. McDougal or others for travel reimbursement or other services outside of such agreements were treated on Mr. Trump's or the Trump Organization's tax returns.
  - c) Please inform us whether the following reported statements are accurate, and if not, why not: (i) "After Trump won the Republican nomination, . . . A.M.I. increased its offer" to Ms. McDougal;<sup>88</sup> (ii) "[a]s voters went to the polls on Election day, [Dylan Howard, AMI's chief content officer], and A.M.I.'s general counsel were on the phone with McDougal and a law firm representing her, promising to boost McDougal's career . . . .";<sup>89</sup> (iii) "A.M.I.'s interest in McDougal seemed to increase after news broke of Trump's alleged affair with Clifford;"<sup>90</sup> and (iv) *In Touch* Magazine did not publish Ms. McDougal's story about her relationship with Mr. Trump after receiving legal threats from Mr. Cohen.<sup>91</sup>
3. With regard to payments or other benefits potentially made to or for the benefit of Jeremy Frommer (for Messrs. Pecker and Cohen):
- a) Please provide a copy of any non-disclosure, confidentiality or similar agreement with Mr. Frommer relating to potentially incriminating photographs involving Mr. Trump; describe the purpose and source of any payments or other benefits promised or provided to Mr. Frommer, and whether and when Mr. Trump or anyone in the Trump Campaign or Trump Organization, or any attorney or representative thereof, was made aware of the matter.

<sup>87</sup> Ronan Farrow, *A Playboy Model, and a System for Concealing Infidelity*, NEW YORKER, Feb. 16, 2018.

<sup>88</sup> *Id.*

<sup>89</sup> *Id.*

<sup>90</sup> *Id.*

<sup>91</sup> Jake Pearson & Jeff Horwitz, *Porn Star Who Alleged Trump Affair: I Can Now Tell My Story*, Assoc. Press, Feb. 15, 2018; Jake Pearson, *Tabloid Held Porn Star's 2011 Interview After Trump Threat*, Assoc. Press, Jan. 19, 2018, 5:48 PM.



4. With regard to any additional payments made to prevent disclosures regarding Mr. Trump beyond the payments or benefits made to Ms. Clifford, Ms. McDougal and Mr. Frommer (for Messrs. Pecker, Cohen, and Kasowitz):
  - a) Please describe any additional payments or benefits that may have been made or legal threats issued in order to prevent relevant individuals from disclosing potentially damaging information about Mr. Trump, along with a copy of the final nondisclosure or other agreement, the purpose and source of such payments, whether and when Mr. Trump or anyone in the Trump Campaign or Trump Organization, or any attorney or representative thereof, was made aware of the relevant transaction, and how such payments were treated for tax purposes.

At a time of ever-increasing concern over sexual harassment and growing appreciation of the importance of offering support to survivors of sexual assault, we believe it is imperative that those responsible be held accountable for their actions, rather than compounding the pain through blanket denials and empty legal threats. Such a course of conduct would be troubling for any individual, let alone the President of the United States.

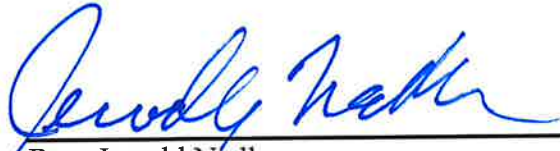
Last month, in reacting to the scandal concerning his former staffer Rob Porter and the general handling of charges of domestic violence by the White House, President Trump stated that he was “totally opposed to domestic violence,”<sup>92</sup> and emphasized the importance of “due process” concerning charges of sexual abuse and violence. Given the foregoing, we would hope and expect you would work with us to insure that the principles of transparency and due process apply to the very serious legal concerns raised in this letter.

Thank you for your prompt attention to this matter. We would ask that you respond to our offices by no later than March 23, 2018.

Sincerely,

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<sup>92</sup> Julie Hirschfeld Davis, Maggie Haberman & Michael D. Shear, *Trump, A Week After Porter Resigned, Says He's "Totally Opposed" to Domestic Violence*, N.Y. TIMES, Feb. 14, 2018.



Rep. Jerrold Nadler  
Ranking Member  
House Committee on the Judiciary



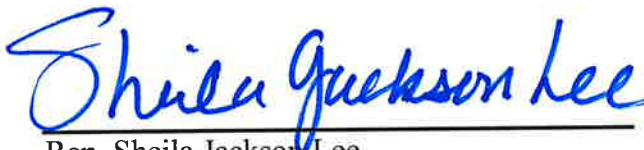
Rep. Lois Frankel  
Chair  
Democratic Women's Working Group



Rep. Brenda L. Lawrence  
Vice-Chair  
Democratic Women's Working Group



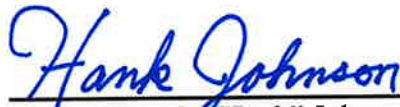
Rep. Zoe Lofgren  
Ranking Member  
Subcommittee on Immigration and Border Security



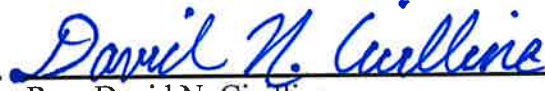
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Ranking Member  
Subcommittee on Crime, Terrorism, and  
Homeland Security



Rep. Steve Cohen  
Ranking Member  
Subcommittee on the Constitution and Civil  
Justice



Rep. Henry C. "Hank" Johnson, Jr.  
Ranking Member  
Subcommittee on Courts, Intellectual  
Property, and the Internet



Rep. David N. Cicilline  
Ranking Member  
Subcommittee on Regulatory Reform,  
Commercial and Antitrust Law



Rep. Jamie Raskin  
Vice Ranking Member  
House Committee on the Judiciary



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September 24, 2015

Alan Garten  
General Counsel  
The Trump Organization  
725 Fifth Avenue  
New York, NY 10022

By Fax: 212.935.0141

Carol A. Laham  
202.719.7301  
claham@wileyrein.com

Thomas W. Kirby  
202.719.7062  
tkirby@wileyrein.com

Re: *Your September 21 "Cease and Desist Demand"*

Dear Mr. Garten:

Club for Growth Action (Club Action) will continue to exercise its fundamental First Amendment right to criticize Mr. Trump's documented anti-growth, pro-tax policies. Club Action rejects Mr. Trump's effort to squelch core First Amendment speech and silence his critics by threatening baseless litigation to be financed from his vaunted deep pockets. If Mr. Trump is so foolish as to follow through on the threats made in the September 21 letter you sent on his behalf, the courts will be on Club Action's side.

The long-standing policy differences between the Club for Growth and Mr. Trump are matters of public policy to be thrashed out through public discourse. However, you should understand that Club Action will never back away from anyone's challenge to its lawful free speech rights.

If Mr. Trump brought suit on the baseless grounds stated in your letter, Club Action would not hesitate to seek sanctions for abusive litigation under Federal Rule 11 or equivalent rules and, depending on the forum, under statutes that deter Strategic Litigation against Public Participation (Anti-SLAPP statutes).

Stripped of its purple adjectives, your letter makes two complaints concerning Club Action. Both complaints are untrue, and neither comes close to the type of knowing and malicious falsehood the First Amendment requires a public figure such as Mr. Trump to establish.

*First*, you complain that one of Club Action's ads (Ad) says that Mr. Trump "supports higher taxes." You admit he has done so in the past, but say he now has a

Alan Garten  
September 24, 2015  
Page 2

plan “to be released later this week [that] supports a lowering of taxes.” On that basis, you accuse Club Action of misstating Mr. Trump’s current position.

But this is nonsense. Club Action has no legal obligation (or ability) to predict supposed future plans. Nor is Club Action required to believe that Mr. Trump’s promised “plan” is a more reliable indicator of his views than his statements and actions from before he was running for office.

As part of your discussion of this point, you say “a reputable organization would have had the decency to disclose its source.” In fact, as you recognize, Club Action already has disclosed one such published source. And it plans to identify further sources in the near future. Indeed, if you visit <https://www.youtube.com/watch?v=AFPnYazbKcE>, you will find a montage of such sources in Mr. Trump’s own voice.

Meanwhile, Club Action will assume that, in a letter such as yours, you would have disclosed all the sources supporting the charges made. Since virtually nothing is disclosed, the conclusion is that no such sources exist. Even the supposed tax plan is to come later.

*Second*, you accuse the Club for Growth of trying to “extort” a million dollars from Mr. Trump in return for its political support. Nonsense. Club Action reports it was Mr. Trump who, last spring, asked to meet with the Club. During the meeting requested by Mr. Trump, as reflected in the attached letter to Mr. Trump, the Club’s Mr. McIntosh made clear that the Club and Mr. Trump had important areas of policy disagreement. However, some areas of policy agreement also were identified. Mr. Trump asked how he could support the Club and, upon being informed that a donation would be appreciated, invited Mr. McIntosh to send a follow-up letter through Mr. Lewandowski, who also attended.

The June 2 cover letter to Mr. Lewandowski has been released, but Mr. Trump withheld the substantive letter from the Club to him. A copy, also dated June 2, is attached. In the very first paragraph of that letter, Mr. McIntosh pointed out that “we don’t see eye to eye on every issue” but there was “some common ground.”

Obviously, that is not a letter proposing an endorsement, and Mr. Trump was not even a candidate at that time. Moreover, the Club has never endorsed any

Alan Garten  
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Presidential candidate, and there was no suggestion that its PAC would do so in this election. Furthermore, the Club is a principled organization. Its positions are well documented and, in many respects, adverse to those of Mr. Trump. Instead, the June 2 letter merely followed up on Mr. Trump's initial request for a meeting and invitation to seek his support for the Club's activities where their views were aligned. While Mr. Trump now apparently believes that taking on the Club is good politics, the Club was not trying to buy anything from Mr. Trump.

Because your letter obviously is a political document, not a civil and serious communication about potential litigation, there is little call for us to address principles of law. We are sure you understand the near-insurmountable difficulties Mr. Trump would face in bringing the type of lawsuit you threaten and the likelihood that, in fact, he would be the one to be sanctioned. But there is one further point worth mentioning. The lawsuit you threaten will place in issue Mr. Trump's personal views and veracity. This will not be a piece of corporate litigation where Mr. Trump can hide behind a subsidiary's CEO. If Mr. Trump were to file such a suit we would press immediately and forcefully for full disclosure concerning his tax and other economic views as they have developed over the years. We would want all relevant documents and would depose Mr. Trump and his advisers, all in real time, confident that the results would vindicate the Ad. Mr. Trump should think carefully whether he really wants to invite the degree of transparency the threatened lawsuit would produce.

We assume from the fact that you wrote the September 21 letter that you are the individual to whom Club Action should respond. This is surprising because you wrote on corporate letterhead and you refer to yourself as General Counsel. As you know, federal election laws restrict corporate direct assistance to candidates. Of course, that is a matter for you and Mr. Trump to take up with federal law enforcement. But if this letter should more appropriately be directed to someone else, for instance, the campaign, please pass it along as appropriate.

Sincerely yours,



Thomas W. Kirby  
Carol A. Laham

Enclosure (June 2 letter to Mr. Trump)

June 2, 2015

Mr. Donald Trump  
c/o Mr. Corey Lewandowski  
725 Fifth Avenue  
New York, NY 10022

Dear Donald,

I very much enjoyed our recent meeting in New York. While we don't see eye to eye on every issue, it's good to know that there is some common ground between us.

The Club for Growth is committed to promoting pro-growth, limited government policies, including: lower taxes, free-trade, and doing away with harmful government regulations that are preventing businesses from creating jobs and stimulating our economy. As we both know, it is business owners who create jobs – not the government.

To that end, the Club for Growth is actively researching candidates who share these fundamental American ideals and are willing to fight for them. Once the Club identifies a potential future champion of economic freedom, it polls to determine if a path to victory exists.

If the Club is confident in the character of the candidate and the possibility of victory, then the Club's PAC endorses the candidate and plays a vital role in helping to elect him/her to Congress.

When we met, you expressed interest in helping to fund the Club for Growth's efforts to fight for economic freedom.

**That is why I am hoping you will consider making a most generous contribution of \$1 million to the Club for Growth.**

This contribution would have a dramatically positive impact on the Club's ability to identify future free-enterprise champions. I hope that I can count on your support.

Sincerely,

David McIntosh  
President, Club for Growth



**JOHN CHIANG**  
TREASURER  
STATE OF CALIFORNIA

February 1, 2017

The Honorable Donald J. Trump  
President  
The White House  
1600 Pennsylvania Avenue  
Washington, D.C. 20501

Dear President Trump:

The Asian Pacific Islander American community is outraged over your unconstitutional executive order shutting our nation's borders to travelers from seven predominantly Muslim countries based solely on their race and religious beliefs.

Your 2,800-word executive order drips with cruel irony as it turns away refugees trying to escape the same Islamic terrorism and violence that you naively claim will be repelled from our shores if we only embrace your bigoted and cowardly directive.

Your ban on Muslims is not only unconstitutional, it forsakes the core values that make America great: equality, fair play, and the shimmering promise that the United States is a welcoming place for those "yearning to be free."

As Americans, we have been taught to take pride in our diversity and our constitutional right to religious freedom. As Asian Pacific Islander Americans, we will not stand idly by as you attempt to pervert this nation's melting pot into a boiling cauldron of intolerance, hate, and division.

APIA federal, state, and local elected officials demand an immediate cancellation of your order. In just days, you have managed to sow fear and confusion among thousands of travelers,

President Donald J. Trump  
February 1, 2017  
Page Two

impacting foreign visitors and legal United States residents alike. There are no reports – or even claims – that any of those who have been turned away from flights or detained posed a credible terrorist threat. They are students, scientists, and interpreters serving America’s interests.

As Asian Pacific Islander Americans, we also know what it is like to be labeled “other,” to become victims of state-sponsored racism, bigotry, and xenophobia. Our Chinese ancestors came here to build the transcontinental railroad in the mid-1800s, only to be officially excluded from our shores with Congress’ passage of the Chinese Exclusion Act. Many of our families were left out of the United States because of the Immigration Act of 1924 which banned Arabs and Asians from coming to our country.

And, we can never forget World War II when we locked up innocent U.S. citizens because in a misguided hysteria to further national security, we deemed them enemy agents simply because they were Japanese American. Many of those incarcerated went on to heroically fight in the U.S Army, helping to defeat Nazi Germany, fascist Italy, and Imperial Japan.

We wrongly believed these shameful ill-begotten episodes had been consigned to the junk pile of American history – and that the sins of our past, seared into our social memory, would forever inform and guide our better future.

Yet, here we are. It is happening again – in 2017 – leaving us shocked, angry, and forced to wear the shroud of indignity you have tossed so casually over the nation. Our Muslim brethren are being mistreated because of their faith, dress, and customs. This is un-American.

President Trump, your executive order is breaking up families; separating children from parents; casting a pale over our centuries’ old rule of law; and punishing people because of the pigmentation of their skin and the deity they worship.

The history of Asian and Pacific Islander American communities allows us to walk in the shoes of Muslims, today. That is why we stand in solidarity with our fellow Muslim-Americans and immigrants. We view your attack on them as an attack on us.

If there is ever a time to stand on the right side of history, it is now.

Please, Mr. President, reverse your divisive and illegal order. America deserves better.

Sincerely,



JOHN CHIANG  
California State Treasurer



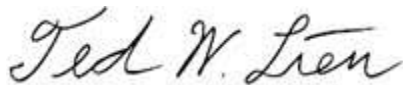
President Donald J. Trump  
February 1, 2017  
Page Three

/ s /

BETTY T. YEE  
California State Controller

A handwritten signature in black ink, appearing to be 'Fiona Ma', with a stylized, cursive script.

FIONA MA, CPA  
Chair, California State Board of Equalization  
Member, 2<sup>nd</sup> District

A handwritten signature in black ink, appearing to be 'Ted W. Lieu', written in a cursive style.

TED LIEU  
Member of Congress, California House of Representatives, 33<sup>rd</sup> District

A handwritten signature in black ink, appearing to be 'Richard Pan', written in a cursive style.

DR. RICHARD PAN  
Member, California State Senate, 6<sup>th</sup> District

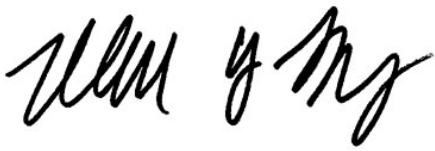
A handwritten signature in blue ink, appearing to be 'Rob Bonta', written in a cursive style.

ROB BONTA  
Chair, California Asian Pacific Islander Legislative Caucus  
Member, California State Assembly, 18<sup>th</sup> District

President Donald J. Trump  
February 1, 2017  
Page Four



DAVID CHIU  
Member, California State Assembly, 17<sup>th</sup> District



PHILIP Y. TING  
Member, California State Assembly, 19<sup>th</sup> District  
Chair, Assembly Committee on Budget



KANSEN CHU  
Member, California State Assembly, 25<sup>th</sup> District



ASH KALRA  
Member, California State Assembly, 27<sup>th</sup> District



EVAN LOW  
Member, California State Assembly, 28<sup>th</sup> District

/ s /

ADRIN NAZARIAN  
Member, California State Assembly, 46<sup>th</sup> District

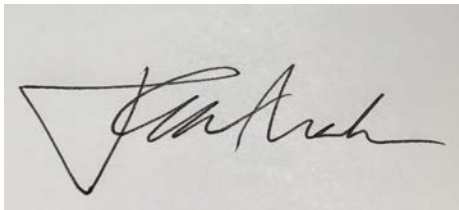
President Donald J. Trump  
February 1, 2017  
Page Five



ED CHAU  
Member, California State Assembly, 49<sup>th</sup> District

/ s /

AL MURATSUCHI  
Member, California State Assembly, 66<sup>th</sup> District



THERESA MAH  
State Representative, Illinois General Assembly, 2<sup>nd</sup> District



RON KIM  
Member, New York State Assembly, 40<sup>th</sup> District

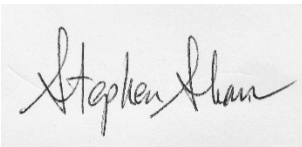


YUH-LINE NIOU  
Member, New York State Assembly, 65<sup>th</sup> District

President Donald J. Trump  
February 1, 2017  
Page Six



MARK L. KEAM  
Member, Virginia House of Delegates, 35th District



STEPHEN SHAM  
Vice Mayor, City of Alhambra, California



JEFFREY KOJI MALONEY  
Councilmember, City of Alhambra, California



ALI SAJJAD TAJ  
Mayor, City of Artesia, California



MARK PULIDO  
Councilmember, City of Cerritos, California

President Donald J. Trump  
February 1, 2017  
Page Seven

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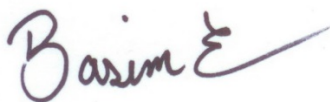
DAVID E. RYU  
Councilmember, City of Los Angeles, California

A handwritten signature in blue ink, appearing to read "David Lim".

DAVID LIM  
Mayor, City of San Mateo, California

A handwritten signature in black ink, appearing to read "Rishi Kumar".

RISHI KUMAR  
Councilmember, City of Saratoga, California  
Director, California League of Cities API Caucus

A handwritten signature in purple ink, appearing to read "Basim Elkarra".

BASIM ELKARRA  
Trustee, Area 5  
Twin Rivers Unified School District, City of Sacramento, California

A handwritten signature in black ink, appearing to read "Ameya Pawar".

AMEYA PAWAR  
Alderman, City of Chicago, Illinois

President Donald J. Trump  
February 1, 2017  
Page Eight

A handwritten signature in black ink, appearing to read 'J. Morita', with a long horizontal flourish extending to the right.

JOSINA MORITA  
Commissioner, Metropolitan Water Reclamation District of Greater Chicago, Illinois



January 31, 2017

The President  
The White House  
1600 Pennsylvania Avenue  
Washington, D.C. 20500

Dear Mr. President:

I am praying for you. I am confident that ministers and church members of our association, for which I serve as president, are also praying for you. Thank you for serving our nation.

I understand that in announcing the temporary ban on immigration from seven nations while our vetting policy is reviewed, you were fulfilling a campaign pledge based on a concern to protect our nation's safety. That is a major task in an era when terrorists are able to reach virtually anywhere in the world and particularly want to target the United States. My encouragement to people has been to pray for you and your advisors as the vetting review is underway. Although a firestorm of protests has erupted as a result of the bans I am not writing because of that, although my suggestions could speak to the reaction.

In the process of the policy review I humbly suggest:

- Take great care to not crush the compassionate heart of America for people who are victims of oppression and unspeakable cruelties, outcasts within their homelands. To care for the oppressed and downtrodden is close the heart of God and is, I submit, one of the reasons He has blessed the United States. Our nation has been enriched beyond measure by generations of immigrants and refugees who long for the safety, freedom, and opportunity of America. Their record of industriousness, entrepreneurial vigor, and loyalty to their adopted nation has been sterling. Protect America, but not at the price of shutting down the admission of refugees.
- Closely consult with refugee relief agencies. They could become key allies for the next policy implementation. Astound your critics with a policy rollout that actually *identifies and expedites processing* of qualified applicants for refugee status. There are many relief agencies with which to consult but I have been particularly impressed with the blend of compassion and professionalism that World Relief and World Vision exhibit.
- Although it may be challenging, complete the vetting review and implement the updated version *before* the 90- and 120-day bans are completed. Surprise the nation with the speed and thoroughness of the review, with a policy clearly marked by compassion and the input of agencies with refugee expertise that improves vetting rather than merely slowing it down.

Thank you for leading our nation. Thank you for listening to the nation. Thank you for listening to God.

Most respectfully,

Randall A. Bach, President

NATIONAL OFFICE

2020 BILL AVENUE, DES MOINES, IOWA 50315-1096 • PHONE 515.288.6761 • FAX 515.288.2510 • EMAIL [RBACH@OPENBIBLE.ORG](mailto:RBACH@OPENBIBLE.ORG)

## **A CALL FOR TRANSPARENCY**

Donald Trump still has not revealed to the American public his international business relationships, even as it becomes increasingly clear that his overseas ties could well constitute significant conflicts of interest when it comes to charting US foreign policy. This is unprecedented for a candidate for the nation's highest office. As such, we are calling on Mr. Trump to disclose, in full, the nature of his business relationships overseas -- to include specifically who his business partners are and what and where are his foreign investments. We also call on him to pledge that he will divest himself of his overseas business interests should he win the presidency.

According to an investigative article published September 15<sup>th</sup> by Newsweek, Mr. Trump has shown poor judgment with regard to whom he has associated with overseas in order to further his business interests. The Newsweek article reports that Mr. Trump courted Muammar Qaddafi, a dictator who murdered his own people and who once pursued nuclear weapons and conducted terrorism against Americans. Newsweek also asserts that Mr. Trump's other business partners have included Kremlin-tied oligarchs and Russians with mafia links, an individual accused of money laundering for the Iranian military, a Turkish media tycoon accused of running a fuel-smuggling ring, Indian companies that may have violated India's laws in their pursuit of business with Mr. Trump, and a South Korean company mired in scandal. Importantly, according to this news item, Mr. Trump's business partnerships owe millions of dollars to Chinese entities.

It's not hard to see why these reported relationships would be problematic. They could impact the foreign policy Mr. Trump would pursue as president, and they seem to have already influenced the policy positions he has taken as a candidate. We do not know whether all of the facts in the Newsweek article are accurate, and the best way to dispel any doubts would be with a full and complete disclosure. The issues are too important to leave them unanswered. It would be in Trump's own interest to resolve these potential conflicts before the election.

Russia offers the most clear cut example of where Mr. Trump's business interests may be influencing his policy positions. Mr. Trump's son has said, "Russians make up a pretty disproportionate cross-section" of their assets and that they "see a lot of money pouring in from Russia." We also know from numerous reports - including from a May Politico piece - that Mr. Trump made millions in 2013 from a Russian oligarch close to Putin when he hosted the Miss Universe event in Moscow and that the two men sought Russian real estate deals together. And Mr. Trump has filled his campaign with top-level advisers with deep ties to Russia, including former campaign chair Paul Manafort, who resigned amid a cascade of revelations about the depth of his connections to pro-Kremlin individuals.

On the campaign trail, Mr. Trump has repeatedly praised Vladimir Putin's authoritarian leadership, while outlining policies that read like a Kremlin wish list. He has claimed that Putin would never invade Ukraine, suggested permanently ceding Crimea to Russia, and placed conditions on upholding our obligation to protect our NATO allies. He even encouraged Russian espionage to interfere with our election, a tactic Putin has deployed across Central Asia and Europe to boost his preferred candidates. In addition, he has floated lifting sanctions against Russia, which would benefit both Putin and the Trump Organization.

Our next commander-in-chief will inherit complex national security threats and complicated relationships with allies and adversaries alike. But our policies must be motivated exclusively by what is in America's best interest, not by the financial interests of our president. The onus is on Donald Trump to assure voters that this will be the case by disclosing the nature of his overseas relationships and committing to divest such assets.



# Signed By:

**Gen John R. Allen, USMC (Ret.),** former Deputy Commander of the U.S. Central Command; former Commander, NATO International Security Assistance Force and U.S. Forces Afghanistan

**Wendy Anderson,** former Chief of Staff to the Deputy Secretary of Defense; former Chief of Staff to the Secretary of Commerce

**Jeremy Bash,** former Chief of Staff to the Director of the Central Intelligence Agency; former Chief of Staff to the Secretary of Defense

**Rand Beers,** former Acting Secretary and Deputy Secretary of Homeland Security

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**Mark P. Lagon**, former Ambassador-At-Large to Combat Trafficking in Persons, Department of State

**George Little**, former Press Secretary for the Department of Defense; former Spokesman for the Central Intelligence Agency

**John MacLaughlin**, former Acting Director and Deputy Director of the Central Intelligence Agency

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## STATEMENT BY FORMER NATIONAL SECURITY OFFICIALS

The undersigned individuals have all served in senior national security and/or foreign policy positions in Republican Administrations, from Richard Nixon to George W. Bush. We have worked directly on national security issues with these Republican Presidents and/or their principal advisers during wartime and other periods of crisis, through successes and failures. We know the personal qualities required of a President of the United States.

None of us will vote for Donald Trump.

From a foreign policy perspective, Donald Trump is not qualified to be President and Commander-in-Chief. Indeed, we are convinced that he would be a dangerous President and would put at risk our country's national security and well-being.

Most fundamentally, Mr. Trump lacks the character, values, and experience to be President. He weakens U.S. moral authority as the leader of the free world. He appears to lack basic knowledge about and belief in the U.S. Constitution, U.S. laws, and U.S. institutions, including religious tolerance, freedom of the press, and an independent judiciary.

In addition, Mr. Trump has demonstrated repeatedly that he has little understanding of America's vital national interests, its complex diplomatic challenges, its indispensable alliances, and the democratic values on which U.S. foreign policy must be based. At the same time, he persistently compliments our adversaries and threatens our allies and friends. Unlike previous Presidents who had limited experience in foreign affairs, Mr. Trump has shown no interest in educating himself. He continues to display an alarming ignorance of basic facts of contemporary international politics. Despite his lack of knowledge, Mr. Trump claims that he understands foreign affairs and "knows more about ISIS than the generals do."

Mr. Trump lacks the temperament to be President. In our experience, a President must be willing to listen to his advisers and department heads; must encourage consideration of conflicting views; and must acknowledge errors and learn from them. A President must be disciplined, control emotions, and act only after reflection and careful deliberation. A President must maintain cordial relationships with leaders of countries of different backgrounds and must have their respect and trust.

In our judgment, Mr. Trump has none of these critical qualities. He is unable or unwilling to separate truth from falsehood. He does not encourage conflicting views. He lacks self-control and acts impetuously. He cannot tolerate personal criticism. He has alarmed our closest allies with his erratic behavior. All of these are dangerous qualities in an individual who aspires to be President and Commander-in-Chief, with command of the U.S. nuclear arsenal.

We understand that many Americans are profoundly frustrated with the federal government and its inability to solve pressing domestic and international problems. We also know that many have doubts about Hillary Clinton, as do many of us. But Donald Trump is not the answer to America's daunting challenges and to this crucial election. We are convinced that in the Oval Office, he would be the most reckless President in American history.

Donald B. Ayer  
Former Deputy Attorney General

John B. Bellinger III  
Former Legal Adviser to the Department of State; former Legal Adviser to the National Security Council, The White House

Robert Blackwill  
Former Deputy National Security Advisor for Strategic Planning, The White House

Michael Chertoff  
Former Secretary of Homeland Security; former Assistant Attorney General for the Criminal Division, Department of Justice

Eliot A. Cohen  
Former Counselor of the Department of State

Eric Edelman  
Former Under Secretary of Defense for Policy; former National Security Advisor to the Vice President, The White House

Gary Edson  
Former Deputy National Security Advisor, The White House

Richard Falkenrath  
Former Deputy Homeland Security Advisor, The White House

Peter Feaver  
Former Senior Director for Strategic Planning, National Security Council, The White House

Richard Fontaine  
Former Associate Director for Near East Affairs, National Security Council, The White House

Jendayi Frazer  
Former Special Assistant to the President and Senior Director for African Affairs; former Assistant Secretary of State for African Affairs

Aaron Friedberg  
Former Deputy National Security Advisor to the Vice President, The White House

David Gordon  
Former Director of Policy Planning, Department of State

Michael Green  
Former Special Assistant to the President and Senior Director for Asia, National Security Council, The White House

Brian Gunderson  
Former Chief of Staff, Department of State

Paul Haenle  
Former Director for China and Taiwan, National Security Council, The White House

Michael Hayden  
Former Director, Central Intelligence Agency; former Director, National Security Agency

Carla A. Hills  
Former U.S. Trade Representative

John Hillen  
Former Assistant Secretary of State for Political-Military Affairs

William Inboden  
Former Senior Director for Strategic Planning, National Security Council, The White House

Reuben Jeffery III

Former Under Secretary of State for Economic Energy and Agricultural Affairs; former Special Assistant to the President for International Economic Affairs, National Security Council, The White House

James Jeffrey

Former Deputy National Security Advisor, The White House

Ted Kassinger

Former Deputy Secretary of Commerce

David Kramer

Former Assistant Secretary of State for Democracy, Human Rights, and Labor

James Langdon

Former Chairman, President's Foreign Intelligence Advisory Board, The White House

Peter Lichtenbaum

Former Assistant Secretary of Commerce for Export Administration

Mary Beth Long

Former Assistant Secretary of Defense for International Security Affairs

Clay Lowery

Former Assistant Secretary of the Treasury for International Affairs; former Director for International Finance, National Security Council, The White House

Robert McCallum

Former Associate Attorney General; former Ambassador to Australia

Richard Miles

Former Director for North America, National Security Council, The White House

Andrew Natsios

Former Administrator, U.S. Agency for International Development

John Negroponte

Former Director of National Intelligence; former Deputy Secretary of State; former Deputy National Security Advisor

Meghan O'Sullivan

Former Deputy National Security Advisor for Iraq and Afghanistan

Dan Price

Former Deputy National Security Advisor

Tom Ridge

Former Secretary of Homeland Security; former Assistant to the President for Homeland Security, The White House; former Governor of Pennsylvania

Nicholas Rostow

Former Legal Adviser to the National Security Council, The White House

Kori Schake

Former Director for Defense Strategy, National Security Council, The White House

Kristen Silverberg

Former Assistant Secretary of State for International Organizations

Stephen Slick

Former Special Assistant to the President and Senior Director for Intelligence Programs, National Security Council, The White House

Shirin R. Tahir-Kheli

Former Special Assistant to the President and Senior Director for Democracy, Human Rights and International Operations, National Security Council, The White House; former Ambassador and Senior Advisor for Women's Empowerment, Department of State

William H. Taft IV

Former Deputy Secretary of Defense; former Ambassador to NATO

Larry D. Thompson

Former Deputy Attorney General

William Tobey

Former Deputy Administrator, National Nuclear Security Administration, Department of Energy; former Director for Counter-Proliferation Strategy, National Security Council, The White House

John Veroneau

Former Deputy U.S. Trade Representative

Kenneth Wainstein

Former Assistant to the President for Homeland Security and Counterterrorism, The White House; former Assistant Attorney General for National Security, Department of Justice

Matthew Waxman

Former Deputy Assistant Secretary of Defense; former Director for Contingency Planning and International Justice, National Security Council, The White House



Dov Zakheim  
Former Under Secretary of Defense

Roger Zakheim  
Former Deputy Assistant Secretary of Defense

Philip Zelikow  
Former Counselor of the Department of State

Robert Zoellick  
Former U.S. Trade Representative; former Deputy Secretary of State



# City of Phoenix

OFFICE OF THE CITY ATTORNEY

BRAD HOLM  
City Attorney

September 29, 2016

Donald J. Trump for President, Inc.  
c/o Timothy Jost, Treasurer  
725 Fifth Avenue  
New York, NY 10022  
trump@redcurve.com

Timothy Jost, Treasurer  
c/o Red Curve Solutions  
138 Conant Street, 2nd Floor  
Beverly, MA 01915

Re: Cease-and-desist demand—Donald J. Trump for President, Inc.’s unauthorized use of City of Phoenix bird, badge, police department uniforms, and on-duty employee images in campaign advertisement

Dear Mr. Jost:

The Donald J. Trump For President, Inc. campaign has violated federal and state law by using copyrighted materials in a campaign advertisement. Specifically, the ad contains images of multiple active-duty City of Phoenix police officers in uniform and at work. *See* <https://newrepublic.com/political-ad-database/donald-trump-movement/OS8yMC8xNjpNb3ZlbWVudA>; original air date: September 20, 2016. For the reasons set forth below, Phoenix demands that the campaign, the candidate, and all of their affiliates and agents immediately (today) take down the ad from every medium, cease using the ad under any and all circumstances, and desist violating Phoenix’s intellectual-property rights in copyrighted materials.

*First*, Phoenix has not approved—and will not approve—the creation or use of any media bearing the faces and likenesses of its on-duty police officers in any political advertisement for any political candidate. The officers were unaware that they were photographed and videotaped, and they did not consent to the use of their on-duty images in any Trump (or other) campaign advertisement. The officers depicted in the ad were in uniform precisely because they were on duty performing work for Phoenix at the time. In

Mr. Timothy Yost  
September 29, 2016  
Page 2

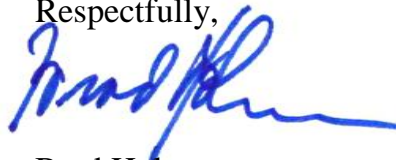
this context, the ad unmistakably and wrongfully suggests that Phoenix and the officers support or endorse Mr. Trump's campaign. That is not the case. Neither Phoenix nor the Police Department support or endorse any candidate for President of the United States or any other political office.

*Second*, Phoenix has not consented to the Trump campaign's use of Phoenix's legally protected intellectual property. The Police Department's uniforms—specifically the badge and insignia patches—belong to Phoenix and constitute protected intellectual property of the City. Phoenix owns the exclusive right to use these distinctive designs under federal and state law, including the U.S. Copyright Act. Phoenix strictly regulates the use of its intellectual property. And Phoenix does not allow any person, entity, or political campaign to appropriate or otherwise use its protected materials or replicas for *any* private purpose such as a campaign ad.

As owner of this intellectual property, the City of Phoenix hereby orders the Trump campaign to immediately cease and desist from your unauthorized use of Phoenix Police Department uniforms, bird emblem, police badge, police insignia patch, and all other imagery of official City of Phoenix materials and on-duty employees. All images, all videotape, and all other material bearing the City of Phoenix's name or intellectual property that you possess—or that you may have distributed to third parties—must be taken down and removed from every medium (television, radio, websites, Internet, etc.) and must not be duplicated or further distributed. All existing copies of photos, videotape, and other images must be immediately removed from the public domain.

The Phoenix City Manager has authorized me to pursue all legal remedies necessary to stop the Trump campaign from using the City's intellectual property. The available remedies include both legal and equitable relief. Please contact me immediately and advise me of the steps that you are taking to comply with this letter's demands. I trust that further action will not be necessary.

Respectfully,



Brad Holm  
City Attorney

RUBEN GALLEGO  
7TH DISTRICT, ARIZONA

1218 LONGWORTH HOUSE OFFICE BUILDING  
WASHINGTON, DC 20515  
(202) 225-4065

DISTRICT OFFICE:  
411 NORTH CENTRAL AVENUE  
SUITE 150  
PHOENIX, AZ 85004  
(602) 256-0551

**Congress of the United States**  
**House of Representatives**  
**Washington, DC 20515-0307**

COMMITTEES:  
ARMED SERVICES  
SUBCOMMITTEES:  
TACTICAL AIR AND LAND FORCES  
READINESS  
NATURAL RESOURCES  
SUBCOMMITTEES:  
ENERGY AND MINERAL RESOURCES  
WATER, POWER, AND OCEANS  
OVERSIGHT AND INVESTIGATIONS

August 13, 2015

The Honorable Sally Jewell  
Secretary  
U.S. Department of the Interior  
1849 C St. NW  
Washington, DC 20240

The Honorable Denise Roth  
Acting Administrator  
General Services Administration  
1800 F St. NW  
Washington, DC 20405

Dear Secretary Jewell and Acting Administrator Roth:

Like you, we strongly believe the federal government has a responsibility to ensure that public lands are welcoming places—especially in our nation’s capital. In light of the deeply insulting comments that Donald Trump continues to direct at the Latino Community and at women, we write to request that you take action to prevent the Trump name from being prominently displayed at the hotel he is currently constructing at the center of Washington, DC.

Trump’s recent and repeated remarks disparaging women, Mexican-Americans, and other Latinos are hateful, divisive and completely inaccurate. We firmly believe this kind of repulsive speech has no place in our public discourse. As a result of these comments, the Trump name is now inextricably linked to the anti-immigrant, anti-Latino and anti-women sentiments that he continues to loudly and publically espouse.

As you know, Trump is currently constructing a hotel at the site of the Old Post Office building, located just steps from the National Mall and less than a mile from the Washington Monument, the United States Capitol and the White House. Once completed, the complex will sit on land leased from GSA while the historic building’s clock tower will continue to be managed by the National Park Service.

We understand that the Department of the Interior rightly prohibits the display of racist or insensitive emblems on lands it controls. In accordance with this policy and in keeping with the Department’s recent efforts to bar the Washington Redskins’ logo on public lands, we urge you to use all available authorities under current law to prevent the Trump name from being prominently displayed at the new hotel.

**Congress of the United States**  
**Washington, DC 20515**

Thank you for your attention to this request. The Trump name and logo have come to serve as a divisive reminder of Donald Trump's reprehensible words. To allow his name to be conspicuously displayed at the heart of our nation's capital would send a message of exclusion and intolerance to millions of Latinos in the District and across the country, including workers at the site itself.

Sincerely,



Ruben Gallego  
Member of Congress



Tony Cardenas  
Member of Congress

THE WHITE HOUSE  
CORRESPONDENCE TRACKING WORKSHEET

INCOMING

DATE RECEIVED: JULY 14, 1989

NAME OF CORRESPONDENT: MR. DONALD J. TRUMP

SUBJECT: PERSONAL COMMENTS; INVITATION TO STAY AT THE  
PLAZA HOTEL IN NEW YORK

ACTION DISPOSITION

ROUTE TO: OFFICE/AGENCY	(STAFF NAME)	ACT CODE	DATE YY/MM/DD	TYPE RESP	C D	COMPLETED YY/MM/DD
JAN BURMEISTER		ORG	89/07/14	CP2		A8907/14
<i>See Hag</i>	REFERRAL NOTE:		<i>I 89/08/01</i>			<i>C 1/1</i>
	REFERRAL NOTE:					
	REFERRAL NOTE:					
	REFERRAL NOTE:					
	REFERRAL NOTE:					

COMMENTS: PERSONAL FRIEND

ADDITIONAL CORRESPONDENTS: MEDIA:L INDIVIDUAL CODES: \_\_\_\_\_  
MI MAIL USER CODES: (A) \_\_\_\_\_ (B) \_\_\_\_\_ (C) \_\_\_\_\_

- \*\*\*\*\*
- |                          |                      |                      |   |
|--------------------------|----------------------|----------------------|---|
| *ACTION CODES:           | *DISPOSITION         | *OUTGOING            | * |
| *                        | *                    | *CORRESPONDENCE:     | * |
| *A-APPROPRIATE ACTION    | *A-ANSWERED          | *TYPE RESP=INITIALS  | * |
| *C-COMMENT/RECOM         | *B-NON-SPEC-REFERRAL | * OF SIGNER          | * |
| *D-DRAFT RESPONSE        | *C-COMPLETED         | * CODE = A           | * |
| *F-FURNISH FACT SHEET    | *S-SUSPENDED         | *COMPLETED = DATE OF | * |
| *I-INFO COPY/NO ACT NEC* |                      | * OUTGOING           | * |
| *R-DIRECT REPLY W/COPY * |                      |                      | * |
| *S-FOR-SIGNATURE *       |                      |                      | * |
| *X-INTERIM REPLY *       |                      |                      | * |
- \*\*\*\*\*

REFER QUESTIONS AND ROUTING UPDATES TO CENTRAL REFERENCE  
(ROOM 75,OEOb) EXT-2590  
KEEP THIS WORKSHEET ATTACHED TO THE ORIGINAL INCOMING  
LETTER AT ALL TIMES AND SEND COMPLETED RECORD TO RECORDS  
MANAGEMENT.

THE WHITE HOUSE  
WASHINGTON

July 28, 1989

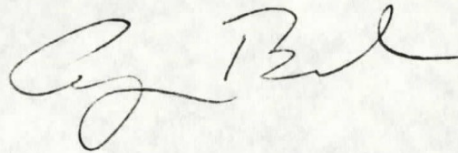
FYI in + out to  
Scheduling .

Dear Donald:

Just a brief note to thank you for your very generous offer to stay at The Plaza the next time we're in New York. It is indeed a magnificent hotel, and I've forwarded your letter to our Scheduling Office for their consideration. As you know, the event we're attending usually determines where we stay.

Barbara joins me in sending best wishes and appreciation for your thoughtfulness.

Sincerely,



Mr. Donald J. Trump  
The Trump Organization  
725 Fifth Avenue  
New York, New York 10022

890801

Dear Donald:

Just a brief note to thank you for your very generous offer to stay at The Plaza the next time we're in New York. It is indeed a magnificent hotel, and I've forwarded your letter to our Scheduling Office for their consideration. As you know, the event we're attending usually determines where we stay.

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Sincerely,

Mr. Donald J. Trump  
The Trump Organization  
725 Fifth Avenue  
New York, New York 10022

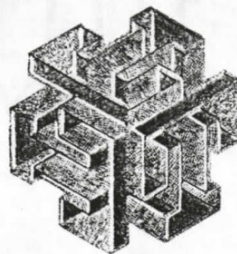
GB/BGreen/ws/lynn (PC-7PRESA)

cc w/incmg to Scheduling

POTUS TO SEE AND SIGN



53460



July 11, 1989

The Honorable George H.W. Bush  
President of the United States  
The White House  
Washington, D.C. 20500

Dear Mr. President:

It is my great pleasure to invite you to stay at The Plaza Hotel on your next visit to New York City. I consider The Plaza to be your "lucky" hotel. As you will remember, you were 17 points down the day we had our wonderful event there. It was a tremendous success, and somehow from that point on you rose in the polls like a rocket.

Designated as a landmark structure and built to rival the grand hotels and palaces of Europe, The Plaza has magnificently appointed suites as well as splendid views of Central Park and the New York skyline. Our security staff is unparalleled, offering state-of-the-art protection round-the-clock, and I am confident that we can more than meet all of your other requirements in terms of comfort and service.

As one of your greatest admirers and supporters, I would be deeply honored if you and Barbara would allow us the privilege and pleasure of welcoming you to The Plaza.

Sincerely,

Donald J. Trump

PHOTOCOPY  
MISC. HANDWRITING

**THE TRUMP ORGANIZATION**

725 FIFTH AVENUE · NEW YORK, N. Y. 10022 212 · 832 · 2000 TELEX · 427715



September 27, 2016

Donald J. Trump President, Inc.  
C/O Trump Tower  
725 5<sup>th</sup> Avenue  
New York, NY 10022

Dear Sir or Madam,


On April 2, 2016 Donald J. Trump made a campaign visit to Eau Claire, Wisconsin. The visit incurred a significant amount of personnel costs, food costs and equipment rental. The police department incurred personnel costs of \$21,054.79 for staff to work and coordinate the event. The transit department incurred personnel costs of \$1,004.96 for busing police officers to the event. The streets department incurred costs of \$2,007.56 for set up of barricades in addition to the cost of the barricade rental of \$1,255. The fire department incurred costs of \$728.98 for standby services. The City Manager's office incurred personnel costs of \$278.84 to cover media relations related to the event. The police department also incurred personnel costs of \$20,107.08 from outside agencies as the City did not have enough police staff to cover the event and food costs for officers of \$961.22.

Enclosed is an invoice for \$47,398.43 the April 2, 2016 event. Please remit payment to:

City of Eau Claire Police Department  
721 Oxford Avenue  
Suite 1400  
Eau Claire, WI 54703

If you have any questions you may contact me at 715-839-6171 or by e-mail at [Kelly.Thompson@eauclairewi.gov](mailto:Kelly.Thompson@eauclairewi.gov).

FOR THE CHIEF OF POLICE:

  
Kelly Thompson  
Administrative Division Manager

Enclosure

**CITY OF EAU CLAIRE  
SERVICE / SUPPLY BILLING FORM**

**BILL TO:**

Dept / Company Donald J. Trump President, Inc. Date Submitted to Accounting: \_\_\_\_\_  
 Contact Name: \_\_\_\_\_ Customer #: \_\_\_\_\_  
 Address: C/O Trump Tower Tax Exempt #: \_\_\_\_\_  
725 5th Avenue Purchase Order #: \_\_\_\_\_  
 City, ST ZIP New York, NY 10022

Description of Service Provided

Costs related to Donald Trump's visit to Eau Claire on April 2, 2016

<u>Description of Charges (Account #'s)</u>	<u>Quantity</u>	<u>Unit Price</u>	<u>Extended Price</u>	<u>Overhead</u>	<u>Total Price</u>
Police Department Personnel Costs					21,054.79
Transit Department Personnel Costs					1,004.96
Streets Department Personnel Costs					2,007.56
Fire Department Personnel Costs					728.98
Media/Communication Specialist Costs					278.84
Barricade Rental					1,255.00
Additional Personnel from Outside Agencies					20,107.08
Food for Officers					961.22
<b>TOTAL</b>					<b>\$ 47,398.43</b>

Requested By: Kelley Thompson Date: 9/26/16  
 Dept Approval: Kelley Thompson Date: 9/26/16

**This form should be used for all invoices to outside agencies, as well as charges between City departments.**

(Please provide account # AND/OR charge code.)

A/R Code: _____ (Ex. GBA)	Invoice #: _____
Account #'s: <u>10001.4852</u>	_____
Fund/Charge Code: _____ (Ex. 100/1037)	Invoice Date: _____

Sum of Amount		
Department Code	Assignment Title	Total
AS-CITY MANAGER	Media/Communications Specialist	\$ 278.84
AS-CITY MANAGER Total		\$ 278.84
FD-OPERATIONS	Fire Captain-EMT Certified	\$ 167.65
	Fire Equipment Operator-EMT Certified	\$ 153.63
	Fire Fighter	\$ 253.29
	Fire Fighter-EMT Certified	\$ 154.41
FD-OPERATIONS Total		\$ 728.98
PD-ADMIN SERV	Police Officer Investigator	\$ 214.70
PD-ADMIN SERV Total		\$ 214.70
PD-COMM CENTER	Communications Center Manager	\$ 420.81
	Communications Center Supervisor	\$ 158.22
PD-COMM CENTER Total		\$ 579.03
PD-DETECTIVE	Deputy Police Chief	\$ 1,575.04
	Police Lieutenant (2080)	\$ 1,200.67
	Police Officer Investigator	\$ 6,501.56
	Police Sergeant (2080)	\$ 1,613.14
PD-DETECTIVE Total		\$ 10,890.41
PD-PATROL	Community Service Officer	\$ 153.29
	Deputy Police Chief	\$ 1,314.39
	Police Lieutenant (2007.5)	\$ 3,303.76
	Police Officer	\$ 2,879.63
	Police Officer Investigator	\$ 53.42
PD-PATROL Total		\$ 7,704.49
PD-RECORD BUREAU	Law Enforcement Associate	\$ 1,666.16
PD-RECORD BUREAU Total		\$ 1,666.16
PW-STREET MAINT	Community Service Supervisor	\$ 481.52
	Community Service Worker I	\$ 936.83
	Community Service Worker II	\$ 589.21
PW-STREET MAINT Total		\$ 2,007.56
PW-TRANSIT	Bus Mechanic III	\$ 429.93
	Bus Operator	\$ 325.28
	Part Time Operator	\$ 60.61
	Part Time Shop Personnel	\$ 53.74
	Transit Supervisor	\$ 135.40
PW-TRANSIT Total		\$ 1,004.96
Grand Total		\$ 25,075.13

Presidential Candidates Barricade Requests and Delivery Time Line

Saturday April 2, 2016

Items Requested	Time Ordered	Location	Time Delivered	Amount	Project Number
12 - Class I barricades and Road Closed Signs for Clinton	Friday April 1, 2016 at 9:00 am	Grand Ave between Farwell and Barstow.	11:30 am on Saturday April 2, 2016	\$72.00	50198
18 - Class I barricades and Road Closed Signs for Trump	Friday April 1, 2016 at 1:00 pm	Keith Street between Clairmont and Rist	12:00 PM on Saturday April 2, 2016	\$108.00	50197
28 - Barrels, 6 Class I and 2 message boards for Keith and Clairmont ave. Trump Event	Friday April 1, 2016 at 4:00 pm	Clairmont Ave Turn Lanes	12:00 PM on Saturday April 2, 2016	\$349.00	50197
133 - Additional Class I barricades for crowd control at Trump event	Saturday April 2, 2016 at 1:00 PM	Keith Street between Clairmont and Rist	2:00 PM on Saturday April 2, 2016	\$798.00	50197
40 - Class 1 Barricades for Crowd control at UWEC	Friday April 1, 2016 at 4:00 pm	In front of Zorn	8:00 am on Saturday April 2, 2016	\$240.00	50199
Removal of barricades from Sanders event completed at 2:00 pm					
Removal of barricades from Clinton event completed at 7:30 pm					
Removal of barricades from Trump event completed at 10:45 pm					

Barricade Rental Total \$1,567.00

Trump \$1,255

Presidential Candidates Food Requests and Delivery Time Line

Saturday April 2, 2016

Items Requested	Time Ordered	Location	Time Delivered	Amount	Project Number	
Bottle water, Juice, Fruit, Granola Bars, Plates, Cups for 20 Officers at 11:30 AM.	10:30 AM	EC Court House	11:30 AM	\$37.94	50197, 50198	18.97
Bottle water, Juice, Fruit, Granola Bars, Plates, Cups for 90 Officers at Noon	10:00 AM	Memorial	11:45 AM	\$147.66	50197	147.66
8 Pizzas for Court house 25 Officers	1:15 PM	EC Court House	2:15 PM	\$40.00	50197, 50198	20.00
Pizzas for 6 officers at Airport ASAP	2:00 PM	Airport	2:30 PM	\$15.00	50198	
15 Pizzas at Officers at Clinton at 4 PM	3:00 PM	Court	3:50 PM	\$74.25	50198	
15 Pizzas for Officers for Trump at 4 PM	3:00 PM	Memorial	4:00 PM	\$74.25	50197	74.25
Subs sandwiches for 100 officers for 5:00 PM	3:30 PM	Memorial	5:00 PM	\$599.50	50197	599.50
Sub Sandwiches for 6 Officers at Airport ASAP	5:30 PM	Airport	6:00 PM	\$48.00	50197	48.00
Bottled water for various Locations	9:30 AM	Various Locations		\$8.08	50197, 50198	4.04
Food For Street Division	6:00 PM	CMF	7:00 PM	\$97.60	50197, 50198	48.80
<b>Total</b>				<b>\$1,142.28</b>		<b>\$961.22</b>

Trump \$961.22

Village of Osceola  
 310 Chieftain Street  
 PO Box 217  
 (715)294-3498

Invoice Number MISC 04-16

Date: April 28, 2016

RECEIVED  
 MAY 02 2016

City of Eau Claire Police Department  
 740 2<sup>nd</sup> Avenue  
 Eau Claire, WI 54703

\$ \_\_\_\_\_

Invoice Number MISC 04-16

Date	Description	Charges	Balance
April 2, 2016	Mutual Aid Request/Assist for Presidential Candidates visit Officer Frieden worked 17 hours @ \$32.28 Mileage = 178 Total @.54/mile	<del>\$548.76</del> \$ 96.12	<del>\$644.88</del>
Adjusted	14 hours	451.92	548.04

ON 5/2/16 I spoke to the Chief at Osceola. He removed the travel time from his billing and asked me to make the adjustment.

*[Handwritten Signature]*

TOTAL BALANCE DUE Upon Receipt	<del>\$644.88</del> 548.04
-----------------------------------	-------------------------------

Village of Osceola  
 310 Chieftain Street  
 PO Box 217  
 Osceola, WI 54020

Eau Claire Police Dept. Mutual Aid Request  
 St. Croix County Sheriff's Office  
 April 2, 2016

	4/2/2016		Hours in Eau Claire	Overtime Pay Rate	WAGES	BENEFITS	Total
	Total hours Worked						
Deputy Corey White	11.5		9	\$ 41.13	\$ 370.17	\$ 107.35	\$ 477.52
Deputy Erik Dunn	11.5		9	\$ 46.68	\$ 420.12	\$ 121.83	\$ 541.95
Sgt. Mitch Thomason	12		10	\$ 49.68	\$ 496.80	\$ 144.07	\$ 640.87
Deputy John Shills, Jr.	12.5		9	\$ 40.37	\$ 363.33	\$ 105.37	\$ 468.70
Deputy Joshua Hecht	16		12.5	\$ 38.79	\$ 484.88	\$ 140.61	\$ 625.49
Deputy Nick Krueger	12.5		9	\$ 46.68	\$ 420.12	\$ 121.83	\$ 541.95
Deputy Aaron Praszchak	11.5		9	\$ 41.13	\$ 370.17	\$ 107.35	\$ 477.52
Deputy Matt Howe	11.5		9.5	\$ 40.37	\$ 383.52	\$ 111.22	\$ 494.73
<b>Totals:</b>	<b>99</b>		<b>77</b>		<b>\$ 3,309.10</b>	<b>\$ 959.64</b>	<b>\$ 4,268.74</b>

Miles Travelled 4 squad cars      Miles: 592      Rate/Mile 0.54      **\$ 319.68**

**SUMMARY**

Wages & Benefits: \$ 4,268.74  
 Mileage: \$ -

**\$ 4,268.74** Total amount being requested

St Croix County Sheriff's Office  
 1101 Carmichael Road  
 Hudson, WI 54016



Village of Lake Hallie Police Department  
13136 30th Avenue  
Chippewa Falls WI 54729

City of Eau Claire Police Department  
721 Oxford Avenue  
Eau Claire WI 54703

Invoice # 0000001  
Invoice Date April 13, 2016  
**Balance Due (USD) \$731.40**

Item	Description	Unit Cost	Quantity	Line Total
Contracted Services	Village of Lake Hallie Police Department Political Rally (Prokopinski, Eaton & Spehle)	731.40	1	731.40

**Total 731.40**  
Amount Paid 0.00  
**Balance Due (USD) \$731.40**

This invoice was sent using 

## PAYMENT STUB

Village of Lake Hallie Police Department  
13136 30th Avenue  
Chippewa Falls WI 54729

### To View Your Invoice Online

Go to

<https://villageoflakehalliepolicedepartment.freshbooks.com/code>  
and enter the code L72e4qZugxPSym

Client

City of Eau Claire Police

Invoice #

Department

Invoice Date

0000001

April 13, 2016

Balance Due (USD)

\$731.40

Amount Enclosed

Spring Valley Police Department  
E121 S. Second St / PO Box 276  
Spring Valley WI 54767

Eau Claire Polcie Department  
740 Second Ave  
Eau Claire WI 54703

Invoice # 0000001  
Invoice Date April 18, 2016  
**Balance Due (USD) \$977.44**

Item	Description	Unit Cost	Quantity	Line Total
Cory Van Effen	Reimbursement for Trump Rally	19.63	15.5	304.27
John DuBois	Reimbursement for Trump Rally	43.43	15.5	673.17
<b>Total</b>				<b>977.44</b>
Amount Paid				0.00
<b>Balance Due (USD)</b>				<b>\$977.44</b>

This invoice was sent using 

## PAYMENT STUB

Spring Valley Police Department  
E121 S. Second St / PO Box 276  
Spring Valley WI 54767

### To View Your Invoice Online

Go to  
<https://springvalleypolicedepartment.freshbooks.com/code> and  
enter the code 3B2LC88H9urzHaK9

**Client** Eau Claire Polcie Department  
**Invoice #** 0000001  
**Invoice Date** April 18, 2016  
**Balance Due (USD)** \$977.44  
**Amount Enclosed**

# INVOICE



Dane County  
210 Martin Luther King Jr. Blvd.  
Room 426 - Attn: Meg Krohn  
Madison WI 53703  
Tel: (608) 266-4110

Invoice Date	Invoice No.
04/15/2016	28686
Customer Number	
20424	
Invoice Total Due	
\$13,581.46	
Payment Terms	
DUE 4/25/2016	

CITY OF EAU CLAIRE POLICE DEPT  
ATTN: LT RYAN DAHLGREN  
SUITE 1400/PO BOX 496  
721 OXFORD AVE  
EAU CLAIRE, WI 54703



REMIT TO: DANE COUNTY TREASURER  
210 MARTIN LUTHER KING JR BLVD  
Room 426 - ATTN: Meg Krohn  
MADISON, WI 53703, (608) 266-4110

Description	Quantity	Price	Original Bill	Adjustment	Paid	Amount Due
MUTUAL AID APRIL 1-3, 2016	1.00	\$13,581.46	\$13,581.46	\$0.00	\$0.00	\$13,581.46
Invoice Total:						\$13,581.46

ORIGINAL  
COPY

SEVEN ARROWS INVESTMENT & DEVELOPMENT CORP.  
590 MADISON AVENUE  
32ND FLOOR  
NEW YORK, NEW YORK 10022

TELEPHONE (212) 335-6161

February 8, 1999

Fax (212) 335-4461

Mr. John Burke  
Trump Hotels & Casino Resorts, Inc.  
725 Fifth Avenue  
24<sup>th</sup> Floor  
New York, New York 10022

Dear Mr. Burke:

Enclosed please find expenses that were incurred on behalf of Trump Hotels & Casino Resorts, Inc. during calendar 1998. The expenses fall into the following categories:

- |  |              |
|--|--------------|
| 1. Expenses incurred on behalf of the Florida gaming project:  | \$ 38,996.32 |
| 2. Expenses incurred prior to and including a trip to Cuba on Behalf of Trump Hotels & Casino Resorts, Inc.: | \$ 68,551.88 |

In prior conversations with Mr. Fields, Mr. [REDACTED] indicated that he had a question as to where the Catholic Charities. Please note that under current law trips of the sort that Mr. Fields took to Cuba must be sanctioned not only by the White House but are technically on behalf of a charity. The one most commonly used is Carinas Cuba.

- |   |                     |
|---|---------------------|
| 3. Overhead for the month of December, 1998 pursuant to an Agreement between Mr. [REDACTED] and Mr. Fields: | <u>\$ 10,000.00</u> |
| Total   | <u>\$117,548.20</u> |

I would appreciate your processing these expenses as soon as possible.

Very truly yours,

*Vickie Faber*

Vickie Faber  
Assistant to Richard T. Fields

-Enclosure-

## ***Donald J. Trump Is A Libel Bully But Also A Libel Loser***

BY SUSAN E. SEAGER

Donald J. Trump is a libel bully. Like most bullies, he's also a loser, to borrow from Trump's vocabulary.

Trump and his companies have been involved in a mind-boggling 4,000 lawsuits over the last 30 years and sent countless threatening cease-and-desist letters to journalists and critics.<sup>1</sup>

But the GOP presidential nominee and his companies have never won a single speech-related case filed in a public court.

This article examines seven speech-related cases brought by Trump and his companies, which include four dismissals on the merits, two voluntary withdrawals, and one lone victory in an arbitration won by default. Media defense lawyers would do well to remind Trump of his sorry record in speech-related cases filed in public courts when responding to bullying libel cease-and-desist letters.

Trump's lawsuits are worthy of a comedy routine, as when Trump sued HBO comedian Bill Maher for suckering Trump into sending his birth certificate to prove he was not the "spawn" of an orangutan, and Trump hit back with a \$5-million breach-of-contract lawsuit, only to withdraw it after the *Hollywood Reporter* ridiculed it. Can anyone say *Hustler v. Falwell*?<sup>2</sup>

Orangutans and joking aside, this examination of Trump's libel losses also provides a powerful illustration of why more states need to enact anti-SLAPP laws to discourage libel bullies like Trump from filing frivolous lawsuits to chill speech about matters of public concern and run up legal tabs for journalists and critics.

### **A. Trump Sues Architecture Critic**

Trump filed his first and crankiest libel lawsuit in 1984 against the *Chicago Tribune* and the newspaper's Pulitzer Prize-winning architecture critic, Paul Gapp. Trump filed his libel lawsuit in the U.S. District Court in the Southern District of New York.<sup>3</sup> Trump claimed he suffered \$500 million in damages.<sup>4</sup>

Gapp, who won the Pulitzer Prize for criticism in 1979, dared to publish a "Design" column in the *Sunday Tribune Magazine* on August 12, 1984 ridiculing Trump's proposal to build the tallest building in the world: a 150-story, nearly 2,000-foot tall skyscraper on a landfill at the southeast end of Manhattan.<sup>5</sup>

Gapp wrote that Trump's planned office tower was "one of the silliest things anyone could inflict on New York or any other city" and a kind of "Guinness Book of World Records architecture." Gapp's column said the "only remotely appealing aspect" of Trump's planned office tower was that it would "not be done in the Fence Post Style of the 1970s." The architect critic slammed

the already-built Trump Tower as a “skyscraper offering condos, office space and a kitschy shopping atrium of blinding flamboyance.” Gapp wrote that Trump’s claim that the 150-story skyscraper would architecturally balance the two World Trade Center towers on the opposite side of lower Manhattan was mere “eyewash.”<sup>6</sup>

Gapp also gave an interview to the *Wall Street Journal*, telling a reporter that Trump’s plan was “aesthetically lousy” and complaining that the central part of Chicago “has already been loused up by giant-ism.”

Trump filed a libel lawsuit in New York, claiming that Gapp’s criticisms in the *Tribune* and the *Journal* were false and defamatory.

Trump added an implication allegation, alleging that the *Tribune* artist’s conception of his planned building made the proposed skyscraper look like “an atrocious, ugly monstrosity” – injecting words that were never used by Gapp – and claimed that Gapp’s statements and the *Tribune* illustration “torpedoed his plans” to build the office tower.<sup>7</sup>

The *Tribune* and Gapp filed a Rule 12(b)(6) motion to dismiss on the grounds that Gapp’s statements and the artist’s rendering were protected opinions, and U.S. District Judge Edward Weinfeld agreed, granting the motion to dismiss.<sup>8</sup>

Judge Weinfeld gave Trump a lesson in the First Amendment and politics: “Men in public life ... must accept as an incident of their service harsh criticism, oftentimes unfair and unjustified – at times false and defamatory – and this is particularly so when their activities or performance may ... stir deep controversy” .... “*De gustibus non est disputandum*, there is no disputing about tastes.”<sup>9</sup>

Judge Weinfeld, then 84, reaffirmed the First Amendment rule that “[e]xpressions of one’s opinion of another, however unreasonable, or vituperative, since they cannot be subjected to the test of truth or falsity, cannot be held libelous and are entitled to absolute immunity from liability under the First Amendment.”<sup>10</sup>

Judge Weinfeld explained that opinions expressed in the form of “rhetorical hyperbole,” “rigorous epithets,” and “the most pejorative of terms” are protected from liability, so long as the opinions do not veer to into factual accusations, such as accusing someone of a crime, unethical conduct, or the lack of professional integrity in a manner that would be proved true or false.<sup>11</sup>

Judge Weinfeld stated that “this court has no doubt that the statements contained in the *Tribune* article are expressions of opinion.”<sup>12</sup> The court held that the “Design” heading and title “architecture critic” informed the reader that the article “embodies commentary” and is “cast in subjective terms,” especially since calling a building “one of the silliest things” and not “appealing” are “highly personal and subjective” judgments.” While “many ... would disagree with Mr. Gapp’s view ... there is no way the Court could instruct a jury on the process of evaluating whether [a] statement is true” when it comes to such “aesthetic matters.”<sup>13</sup>

The court also rejected Trump's claim that the Tribune artist's rendering of the proposed tower was "false" because it allegedly misrepresented his architectural plan.

Judge Weinfeld held that the sketch was not factual because it was described as an "artist's conception" and even if the drawing did imply that the planned 150-story tower was "an atrocious, ugly monstrosity," this is "precisely the same sort of individual, subjective aesthetic opinion" that is not capable of being subjected to "factual proof."<sup>14</sup>

The court also called out Trump's doublespeak to which the American public is now quite familiar.

Trump argued that the artist's illustration in the *Tribune* did not accurately depict "his proposal" for the building's specific "tapered" design, but "at the same time" Trump was "equally vehement in declaring that he has no plans and has not even engaged an architect." Judge Weinfeld said: "Plaintiff cannot have it both ways."<sup>15</sup>

Of course this was not painless victory for the *Chicago Tribune*; it spent \$60,000 in legal fees to win the motion to dismiss.<sup>16</sup>

New York's anti-SLAPP statute is limited to claims arising from the right to petition the government, and does not protect speech outside of government proceedings, so the Tribune and Gapp could not use the statute to dismiss the libel claim. If New York had a SLAPP statute that protected speech about matters of public concern, the *Tribune* and Gapp could have argued that they were being sued over speech about a matter of public concern and brought a quick motion to dismiss based on their absolute immunity for opinion and sought reimbursement of their \$60,000 in legal fees from Trump.<sup>17</sup>

## **B. Trump Sues Book Author for Saying He Is Not a Billionaire**

Trump's next big libel lawsuit was filed in New Jersey state court more than 20 years later.

This time, Trump alleged a whopping \$5 billion in damages<sup>18</sup> in his 2006 libel lawsuit against book author Timothy O'Brien and his book publishers, Time Warner Book Group, Inc. and Warner Books, Inc.<sup>19</sup>

Trump's lawsuit claimed that O'Brien's 2005 book, *TrumpNation, The Art of Being The Donald*, falsely reported that Trump was "only" worth between \$150 million to \$250 million, nowhere near the net worth claimed by Trump, which ranged from \$4 billion to \$5 billion to \$6 billion to \$9.5 billion.<sup>20</sup> Trump sued for libel, claiming he was really, really worth billions of dollars.

Once again, Mr. Trump saw his libel lawsuit tossed out of court, this time by New Jersey Superior Court Judge Michele M. Fox, who granted the defendants' motion for summary judgment based on no actual malice, which was affirmed by a New Jersey appellate court.<sup>21</sup> "Nothing suggests that O'Brien was subjectively aware of the falsity of his source's figures or that he had actual doubts as to the information's accuracy," the New Jersey appellate court ruled.<sup>22</sup>

The appellate court concluded that “there is no doubt that Trump is a public figure” and that he failed to meet his burden of proving the book’s statements about his net worth millions was false was published with actual malice.<sup>23</sup> “Nothing suggests that O’Brien was subjectively aware of the falsity of his source’s figures or that he had actual doubts as to the information’s accuracy,” the New Jersey appellate court ruled.<sup>24</sup>

The court held that O’Brien, an experienced financial reporter and then the *Sunday Business* section editor at the *New York Times*, relied on three confidential sources who gave “remarkably similar” estimates of Trump’s actual net worth of between \$150 million to \$250 million.<sup>25</sup>

Earlier in the litigation, a different trial court judge ordered O’Brien to produce the names of his confidential sources, but the New Jersey appellate court reversed, holding that the New Jersey’s qualified reporter’s privilege protected O’Brien’s right to keep the identities of his confidential sources.<sup>26</sup> O’Brien produced his notes from his interviews of those confidential sources in discovery, however.

The appellate court also rejected Trump’s argument that O’Brien published with knowing falsity because O’Brien rejected the financial information provided by Trump before the book was published.

The court found that “it is undisputable that Trump’s estimates of his own worth changed substantially over time and thus [Trump] failed to provide a reliable source” to O’Brien to rebut the confidential sources.<sup>27</sup>

Trump and his accountant were their own worst enemies in their depositions. The accountant who prepared Trump’s 2004 Statement of Financial Condition admitted at his deposition that he never verified whether Trump had been honest in listing all his debts and liabilities for the accountant’s report, which Trump had provided to O’Brien for the book.<sup>28</sup>

Trump was even more unreliable in his testimony about his net worth:

Q: Now Mr. Trump, have you always been completely truthful in your public statements about your net worth of properties?

A: I try.

Q: Have you ever been not truthful?

A: My net worth fluctuates, and it goes up and down with markets and with attitudes and feelings, even my own feelings but I try.

Q: Let me just understand that a little bit. Let’s talk about that for a second. You said that the net worth goes up and down based on your own feelings?

A: Yes ....<sup>29</sup>



The court concluded that “Trump’s estimates of his own worth changed substantially over time and *thus failed to provide ... reliable*” evidence that proved O’Brien’s book false.<sup>30</sup> In other words, Trump ran to the court complaining that the book falsely debunked Trump’s claim of being a billionaire but utterly failed to provide any reliable evidence to prove falsity.

Trump later complained about the dismissal of the lawsuit, displaying his misunderstanding of the law of public figure and actual malice. “Essentially, the judge just said, ‘Trump is too famous,’” he told the Atlantic magazine in 2013. “‘He’s so famous that you’re allowed to say anything you want about him.’”<sup>31</sup> No wonder Trump wants to change libel law; he doesn’t understand it.

Trump later boasted to the *Washington Post* that he didn’t mind losing after five years of litigation. “I spent a couple of bucks on legal fees but they spent a whole lot more. I did it to make [O’Brien’s] life miserable, which I’m happy about.”<sup>32</sup>

That, ladies and gentlemen, is a paradigm SLAPP lawsuit: good at harassing and draining the bank accounts of critics, but ultimately a loser in court. New Jersey does not have an anti-SLAPP statute.

### **C. Trump University Sues Former Student**

In 2010, Trump switched gears and filed a libel suit on behalf of Trump University, his for-profit real estate “school.” Trump U filed a \$1-million libel lawsuit in 2010 in the U.S. District Court for the Southern District in San Diego against Tarla Makaeff, a former Trump U student, yoga instructor, and whistleblower.<sup>33</sup>

Trump U filed its libel lawsuit against Makaeff after she filed a class-action lawsuit as the lead plaintiff against Trump U and Trump for alleged deceptive business practices. In her class-action lawsuit, she claimed she was tricked into raising her credit card limit, ostensibly to buy real estate, but then Trump U persuaded her to use her credit card to pay nearly \$35,000 to enroll in an “elite” Trump U class.<sup>34</sup>

Trump U sued Makaeff for her pre-litigation statements about Trump U when she posted on internet message boards and wrote a letter to the Better Business Bureau and her bank requesting a \$5,100 refund for services charged by Trump U. Trump U claimed that she defamed the school by claiming in her letters that that Trump U and its affiliates engaged in “fraudulent business practices,” “deceptive business practices,” “grand larceny,” “predatory behavior,” “criminal” business practices, and used “trickery” and “fraud” to persuade her to open a new credit card, which she called “grand larceny” and “identity theft.”<sup>35</sup>

Makaeff took advantage of California’s anti-SLAPP statute to file a special motion to strike Trump U’s libel counterclaim. The California statute allows defendants to bring quick motions to strike speech-related claims that target speech about a matter of public concern and are meritless because the plaintiff cannot show a probability of prevailing.<sup>36</sup>

Makaeff argued that Trump U’s claim was subject to dismissal under the two-part test of the anti-SLAPP statute because: (1) the claim arose from her exercise of speech about a matter of public concern – Trump U’s deceptive business practices and her statements about consumer protection; and (2) Trump U could not show a “probability of prevailing” on the merits of the defamation claim because Trump U was a public figure lacking evidence that Makaeff published with actual malice.<sup>37</sup>

U.S. District Judge Irma Gonzalez, who was initially assigned to the case, held that Trump U’s libel claim came under the protection of the anti-SLAPP statute because the claim arose from Makaeff’s statements about “consumer protection information,” which was a matter of public concern. But Judge Gonzalez denied Makaeff’s anti-SLAPP motion on the grounds that Trump U was not a public figure and had established a probability of prevailing on its libel claim under the negligence standard for private figures.<sup>38</sup>

The Ninth Circuit Court of Appeals affirmed the lower court’s holding that Trump U’s libel claim came under the protection of the anti-SLAPP statute, but reversed the lower court’s holding that Trump U was a private figure, and held that the for-profit school is a limited purpose public figure due to its use of “aggressive advertising campaign” on the internet, newspapers, and radio, and sent the case back to the district court to decide if Trump U could prove actual malice.<sup>39</sup>

On remand, the case was assigned to U.S. District Judge Gonzalo P. Curiel, who granted Makaeff’s anti-SLAPP motion and dismissed Trump’s \$1-million libel claim in 2014. The court held that Trump U could not meet his burden of showing a probability of prevailing because Makaeff believed the truth of her statements and Trump lacked evidence that Makaeff’s statements were made with actual malice.<sup>40</sup>

The court also ordered Trump U to pay nearly \$800,000 for Makaeff’s attorney’s fees and costs.<sup>41</sup> The legal fees order is on hold pending the outcome of the class action lawsuit.

Six years into her class-action lawsuit, which has still not gone to trial, Makaeff was shell-shocked how she had been “put through the wringer,” developed health problems, and was having a hard time finding work due to the high-profile nature of the case, and she was permitted by Judge Curiel to withdraw as lead plaintiff in 2016.<sup>42</sup>

As for Judge Curiel, he has been subjected to repeated verbal attacks by Trump, who called the judge “a hater of Donald Trump” with “hostility toward me.” Trump incorrectly claimed that the Indiana-born Latino judge was “Spanish” and “Mexican” and contends that the judge is biased against Trump due to his campaign pledge to build a wall between the United States and Mexico. Trump never filed a recusal motion, and has hinted that he might bring a “civil” lawsuit against Curiel after the election.<sup>43</sup>

#### **D. Trump Sues Miss Pennsylvania**

Trump’s corporate lawyer Michael Cohen recently cited the sole Trump & Co. defamation victory – a default judgment – to bully another reporter.

“Do you want to destroy your life?” Cohen asked a *Daily Beast* reporter last year. “It’s going to be my privilege to serve it to you on a silver platter like I did that idiot from Pennsylvania in Miss USA, because I think you are dumber than she is.” Cohen said. “Sheena Monnin, another one that wanted to defame Mr. Trump and ended up with a \$5 million judgment. That’s going to be nothing compared to what I do to you.... So I’m warning you, tread very fucking lightly, because what I’m going to do to you is going to be fucking disgusting. You understand me?”<sup>44</sup>

Monnin, a former Miss Pennsylvania, tangled with Trump when she entered the 2012 Miss USA Pageant along with 50 other contestants, and was soon eliminated.<sup>45</sup>

While waiting in the wings during the telecast, Monnin claims that another contestant confided that she had seen a list of the five finalists and the ultimate winner – Miss Rhode Island – and the outcome had been predetermined by pageant officials.<sup>46</sup>

The next day, Monnin told her agent she was resigning from her post as 2012 Miss Pennsylvania and from the Miss Universe pageant because she believed the Miss USA pageant was “rigged” and because she did not agree with the pageant’s decision to allow transgendered contestants.

Monnin posted on her Facebook page about her resignation, saying she was quitting “an organization I consider to be fraudulent, lacking in morals, inconsistent and in many ways trashy.”<sup>47</sup> The next day, Monnin posted on her Facebook page the details about the reputed list, saying the “show must be rigged” and was “dishonest.”<sup>48</sup>

Trump, who helps run the Miss USA pageant as an equity partner with the Miss Universe L.P. company, quickly escalated the dispute by appearing on *Good Morning America* to refute Monnin’s Facebook claims, saying she had “loser’s remorse” and that her allegations were “disgraceful.” Monnin responded by appearing on *The Today Show* to explain and repeat her allegations from her Facebook page.

Trump’s Miss Universe pageant filed a \$10-million claim against Monnin with JAMS, the private arbitration service mandated by Monnin’s Miss USA contract, asserting claims against Monnin for defamation, tortious interference with prospective economic advantage, and breach of contract.<sup>49</sup>

Monnin said she got bad advice from her lawyer, who repeatedly told her that she was not required to attend the arbitration, only to tell Monnin later that he could not represent her because he was not admitted to practice law in New York.<sup>50</sup>

With Monnin and her attorney absent from the arbitration proceeding, no one provided any evidence to rebut testimony that Miss USA supposedly suffered \$5 million in damages because the oil company BP, formerly known as British Petroleum, allegedly backed out of its reputed plan to provide a \$5-million sponsorship fee due to BP’s alleged concern about Monnin’s allegations.<sup>51</sup>

The JAMS arbitrator, retired U.S. Magistrate Judge Theodore H. Katz, held that Monnin’s statements were false, defamatory, and published “with actual malice,” and awarded the Miss

Universe company its full \$5 million defamation damages claim.<sup>52</sup> The arbitrator dismissed the tortious interference and contract claims.

Monnin filed a motion in the U.S. District Court for the Southern District of New York to vacate the \$5-million defamation award, arguing that Monnin failed to receive proper notice of the arbitration, received ineffective counsel from her lawyer, the arbitrator exceeded his authority and exhibited “manifest disregard for the law” by finding liability without any evidence that BP cited Monnin’s comments as the reason for withdrawing its planned pageant sponsorship.<sup>53</sup>

As Monnin pointed out, the arbitrator awarded the full \$5-million sponsorship fee award to Trump’s pageant company even though no one from BP testified at the arbitration. The arbitrator relied solely on hearsay testimony from a Miss USA pageant employee who testified that BP withdrew its \$5 million sponsorship fee.<sup>54</sup>

Although this was not raised by Monnin, the arbitrator appeared to apply the negligence standard instead of the required actual malice standard when he cited the following evidence of Monnin’s actual malice: she made “malicious” statements as a “disgruntled contestant,” her “rigged” allegation was “highly improbable,” she “made no attempt to seek verification” of her claim with other sources, she failed to respond to discovery demands, failed to appear to argue the truth of her statements, and lost by default.<sup>55</sup>

On July 2, 2013, U.S. District Judge J. Paul Oetken rejected all of Monnin’s challenges and affirmed the arbitrator’s \$5 million default judgment. While Judge Oetken expressed “[s]ympathy” that Monnin “is suffering from her poor choice of counsel” and agreed that her lawyer acted “unconscionably,” he declined to vacate the judgment because the arbitrator relied on evidence to support his decision and the “apparent inequity” of the default judgment was not enough for the federal court vacate the judgment under the very protective rules for arbitration awards.<sup>56</sup>

Monnin later sued her former New Jersey lawyer for malpractice in Camden County (New Jersey) Superior Court in 2013,<sup>57</sup> and her father, Phillip Monnin, contends his daughter did not pay “a penny” of the \$5 million judgment when Trump’s attorney filed a notice of satisfaction of the full \$5 million *Miss Universe L.P. v. Monnin* arbitration award.<sup>58</sup>

For Trump to boast about winning this arbitration claim is misleading. The arbitrator never heard any rebuttal to the factual allegations and legal theories made by Trump’s pageant company, the judgment was not subject to the full appellate review available to litigants in public courts, and Monnin’s attorney acted “unconscionably.”

### **E. Trump Sues Maher About Orangutan Joke**

Trump has zero sense of humor. But, boy, can he file a hilarious lawsuit! He proved that much when he sued HBO *Real Time* cable television show host Maher for not making good on Maher’s *joke* that Maher would donate \$5 million to charity if the orange-haired and orange-tinged Trump could provide a birth certificate showing that Trump was not the “spawn of his mother having sex with an orangutan.”<sup>59</sup>

At the time, Trump was exploring a run for the GOP presidential nomination and Maher made his donation joke as part of his political comedy shtick ridiculing Trump's "racist" and false "birther" claim that President Obama, our first African American president, was born in Kenya, not the United States, and Trump's offer to pay \$5 million to charity if Obama produced his birth certificate.<sup>60</sup>

Trump's lawyer responded by sending Maher a copy of Trump's birth certificate, "demonstrating he is the son of Fred Trump, not an orangutan," and a "formal acceptance" letter directing Maher to divvy up his \$5 million donation among five charities.<sup>61</sup>

When Maher did not cut a donation check, Trump filed a \$5-million "breach of contract" lawsuit in Los Angeles Superior Court against Maher.<sup>62</sup> Exhibit A of his lack of a sense of humor (literally it was Exhibit A): Trump attached a transcript of Maher's appearance on the *Tonight Show with Jay Leno* to prove Trump thought Maher's offer was serious, including Maher's offer to "donate to a charity of his choice .... Hair Club for Men, The Institute for Incurable Douche-bag-ery. Whatever charity!"<sup>63</sup>

Trump thought it was important to state in his lawsuit that a 2011 *Newsweek* poll showed he would "enjoy the support of 41% of voters in a hypothetical race against President Obama."<sup>64</sup>

Trump was roundly ridiculed by the *Hollywood Reporter* for filing such a frivolous lawsuit.<sup>65</sup>

It was obvious to media lawyers that Maher could seek a quick dismissal under the U.S. Supreme Court decision *Hustler*, which held that statements about a public figure reasonably understood to be a caricature, parody, or satire – a joke – are not actionable under any theory of liability claiming a falsehood.<sup>66</sup>

Maher also had a very good chance of winning an anti-SLAPP motion under California's anti-SLAPP statute. Although Trump's lawsuit against Maher was labeled a "breach of contract" lawsuit, Trump's lawsuit targeted Maher's speech about a matter of public concern – Maher's critique of Trump's "racist," anti-Obama birther campaign while Trump explored a presidential bid<sup>67</sup> As it turns out, Trump's birther campaign likely helped catapult Trump to the GOP presidential nomination three years later.

Shortly after filing his frivolous lawsuit against Maher, Trump quickly withdrew it, and his lawyer said he would refile an amended complaint.<sup>68</sup> He never did.

## **F. Trump Hotel Sues Bartender and Culinary Unions**

By 2015, Trump was an actual GOP candidate for the presidential nomination and more aggressive in using lawsuits to chill negative speech about him. He was probably fed up with losing libel claims and being blocked by the First Amendment and became more creative trying to avoid the defamation label and his old foe, the First Amendment.

On October 5, 2015, Trump gave a campaign speech at the Treasure Island Hotel & Casino, a rival hotel. Outside the hotel, culinary workers and bartenders trying to organize a union at the Trump Hotel Las Vegas handed out flyers saying that Treasure Island Hotel & Casino employed unionized workers while Trump “refused to agree to a fair process for workers at his hotel to form a union.” The workers’ flyers asked “If Trump choses to stay at a union hotel, why can’t Trump Hotel workers choose to form a union.”

Trump sued the culinary and bartender labor unions that organized the protest in U.S. District Court in the District of Nevada, claiming the flyers hurt his hotel’s reputation by falsely implying that he had not stayed at his own hotel due to lesser quality. Instead of suing for libel, the companies sued the unions for violating Section 43(a) of the federal Lanham Act for alleged false advertising and for violating Nevada’s deceptive trade practices law. Trump sued in the name of his hotel companies, Trump Ruffin Commercial LLC and Trump Ruffin Tower I LLC.<sup>69</sup>

There was just one problem with the Trump hotel lawsuit, according to Chief U.S. District Court Judge Gloria M. Navarro. To make out a case for false advertising, Trump’s hotel needed to allege that the workers’ allegedly false statements were “commercial speech,” that is, to propose a commercial transaction.

The court found that even if the workers’ statements were “intended to, and would have the tendency to cause harm to the reputation of Trump Hotel Las Vegas,” the workers’ statements did not qualify as commercial speech under the Lanham Act because they were not proposing a commercial transaction.

Judge Navarro dismissed the Lanham Act claim without prejudice on August 8, 2016, holding that Trump’s hotel companies failed to allege that the labor unions were engaged in commercial speech, and dismissed the state law claim due to lack of jurisdiction.<sup>70</sup> The Trump hotel companies chose not to file an amended complaint and voluntarily dismissed the lawsuit,<sup>71</sup> and the court closed the case.

Once again, Trump’s attempt to escape the burdens of libel law and the First Amendment by pleading a non-libel claim failed.

### **G. Trump Sues to Make Clear He Is Not a Racist Mass Murderer**

Not only does Trump lack a sense of humor, he doesn’t know from rhetorical hyperbole. We got the message loud and clear from Trump’s \$2.5 billion lawsuit against television network Univision Networks & Studios, Inc. and its programming chief Albert Ciurana.

In his 2015 lawsuit, Trump filed claims for breach of contract, intentional interference with contractual relationships, and defamation arising from the Spanish-language network’s decision to stop airing Trump’s beauty pageants after Trump stated during his presidential campaign announcement that Mexican immigrants were “rapists” and criminals.

Trump alleged that he was defamed to the tune of \$1 billion by Ciurana’s Instagram post of Trump’s photo side-by-side with a photo of accused Southern white supremacist mass murderer

Dylann Roof with the caption “Sin commentaries,” or “No comments.”<sup>72</sup> Ciurana posted the Instagram photos shortly after Trump’s “rapists” and criminals statement, and later apologized.

Trump claimed that given the “target audience” of Ciurana’s post, “a reasonable person could understand Mr. Ciurana to be stating that Mr. Trump had committed heinous acts similar to Roof, and/or that Mr. Trump had incited others to commit similar heinous acts.”<sup>73</sup>

Without an ounce of irony, Trump wanted to make it clear in his lawsuit that he is not a racist mass murderer: “This statement [the alleged implication of the Instagram post] is patently false,” Trump alleged, “because as Defendants well knew (*or should have known*) at the time (*and still*) Mr. Trump has never committed heinous acts similar to Roof’s and never incited Roof or anyone else to commit such heinous acts.”<sup>74</sup>

Univision and Ciurana filed a motion to dismiss, arguing that the Instagram post was not a statement of fact, but a “visual satire” and an expression of a personal opinion by Ciurana, a Mexican immigrant himself, about Trump’s qualifications as a candidate for president, which is quintessential political speech protected by the First Amendment. The defendants chided Trump for not remembering that he lost his first defamation case against the *Chicago Tribune* for failing to understand the protection of opinion.

Univision and Ciurana also argued that the satirical post simply compared the two men’s similar frowns and hair, and that it would be a “stretch” and “far from plausible” that the post conveyed that both Roof and Trump “hold comparably racist views,” but even if that was the message, this message still would be protected opinion.<sup>75</sup> The breach of contract claim was frivolous, Univision argued, because Trump had already breached the contract by pushing away all the advertisers and viewers of the planned first-ever Spanish-language version of Trump’s beauty pageants with his offensive comments about Mexican immigrants who formed a large part of the Univision audience.

Shortly before oral argument on the motion to dismiss, Trump and co-plaintiff Miss Universe L.P., LLLP filed a notice of voluntary dismissal of their lawsuit with prejudice on Feb. 11, 2016, depriving us of what promised to be a very interesting oral argument. The parties announced a confidential settlement of the lawsuit but only mentioned the settlement of the contract claim,<sup>76</sup> so I count the dismissal of the defamation claim as another loss to Trump.

### **More Anti-SLAPP Statutes Are Needed**

Trump has pledged to get revenge on the First Amendment. Trump has promised “to open up our libel laws so when they write purposely negative and horrible and false articles, we can sue them and win lots of money.”<sup>77</sup>

Trump’s campaign pledge misrepresents and misunderstands libel law. The First Amendment already punishes “purposely . . . false articles” about powerful public figures like Trump and his companies. It’s called publishing with actual malice.<sup>78</sup> Trump has never been able to prove actual malice in a public trial court.

Trump’s speech-targeting lawsuits filed in public courts were doomed to failure because the First Amendment protects good-faith reporting about public figures (that is, published without actual malice) and immunizes subjective opinions and jokes, even if they are “negative” and “horrible,” as Trump complains.

Journalists and whistleblowers may have won dismissal of Trump’s libel lawsuits, but at significant cost of time, energy, and money.

State legislatures should enact more anti-SLAPP statutes allowing defendants to quickly dismiss meritless lawsuits targeting speech about matters of public concern.<sup>79</sup> Over two dozen states have enacted these statutes.<sup>80</sup> A federal anti-SLAPP law has been proposed. Many state statutes require plaintiffs like Trump to pay the prevailing defendant’s legal fees, as Trump University discovered in California when the court granted a former student’s anti-SLAPP motion dismissing the school’s flawed libel claim and ordered Trump University to pay nearly \$800,000 in attorney’s fees.<sup>81</sup> A federal anti-SLAPP law has been proposed.

These anti-SLAPP laws, while not perfect, would help discourage frivolous libel lawsuits favored by Trump & Co. Instead of labeling frivolous, speech-targeting lawsuits “SLAPP suits,” perhaps we should call them “Trump Suits.”

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<sup>1</sup> A 2016 study by *USA TODAY* located over 4,000 lawsuits filed by or against Trump and his companies over three decades, an unprecedented number for a presidential nominee. *USA TODAY* located seven speech-related lawsuits or arbitrations filed by Trump and his companies. *USA TODAY Network: Dive into Donald Trump’s thousands of lawsuits*, USA TODAY, <http://usatoday.com/pages/interactives/trump-lawsuits/>, Nick Penzenstadler, *New USA TODAY interactive database shows Trump lawsuits surpass 4,000*, USA TODAY (July 7, 2016), <http://www.usatoday.com/story/news/politics/onpolitics/2016/07/07new-usa-today-interactive-database-shows-trump-lawsuits-surpass-4000/86809010/>. This article examines the seven speech-related lawsuits or arbitration proceedings brought by Trump and his companies discussed by USA TODAY and located in an independent search by the author.

<sup>2</sup> 485 U.S. 46, 56-57 (1988) (statements not reasonably understood as stating facts – in this instance a parody liquor-and-sex advertisement in *Hustler* magazine poking fun at the Rev. Jerry Falwell – are not actionable under any theory of liability based on an alleged “false” publication, even if the statements are “offensive” and “vulgar”).

<sup>3</sup> *Trump v. Chicago Tribune Co.*, 616 F. Supp. 1434 (S.D.N.Y. 1985) (*Trump I*).

<sup>4</sup> Nat Hentoff, *Citizen Trump*, WASH. POST (Oct. 19, 1985), <http://www.washingtonpost.com/archive/politics/1985/10/19/citizen-trump/88efc4ba-6c1e-4226-8924-4101-a60f5478/>

<sup>5</sup> *Trump I*, 616 F. Supp. at 1434.

<sup>6</sup> *Id.* at 1435.

<sup>7</sup> *Id.*

<sup>8</sup> *Id.* at 1436.



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<sup>9</sup> *Id.*

<sup>10</sup> *Id.* at 1435 (citations and quotations omitted).

<sup>11</sup> *Id.*, citing *Letter Carriers v. Austin*, 418 U.S. 264, 284 (1974) and *Greenbelt Pub. Assn v. Bresler*, 398 U.S. 6, 14 (1970). Although Judge Weinfeld’s decision in *Trump v. Chicago Tribune Co.* was issued in 1985, before the U.S. Supreme Court narrowed its protection for opinions in *Milkovich v. Lorain Journal Co.*, 497 U.S. 1 (1990), Judge Weinfeld’s decision was based on the protection for non-factual, hyperbolic opinions and remains good law.

<sup>12</sup> *Trump I*, 616 F. Supp. at 1436.

<sup>13</sup> *Id.*

<sup>14</sup> *Id.* at 1438.

<sup>15</sup> *Id.*

<sup>16</sup> Hentoff, *supra* note 4.

<sup>17</sup> SLAPP suits are meritless lawsuits that target speech about a matter of public concern. SLAPP is an acronym for Strategic Litigation Against Public Participation. *See generally* Cal. Civ. Proc. Code § 425.16.

<sup>18</sup> Paul Farhi, *What really gets under Trump’s skin? A reporter questioning his net worth*, WASH. POST (March 8, 2016), [https://www.washingtonpost.com/lifestyle/style/that-time-trump-sued-over-the-size-of-hiswallet/2016/03/08/785dee3ee-e4c2-11e5-bofd-073d5930a7b7\\_story.html](https://www.washingtonpost.com/lifestyle/style/that-time-trump-sued-over-the-size-of-hiswallet/2016/03/08/785dee3ee-e4c2-11e5-bofd-073d5930a7b7_story.html)

<sup>19</sup> *Trump v. O’Brien*, 29 A.3d 1090, 1092 (N.J. Super. Ct. App. Div. 2011) (*Trump II*).

<sup>20</sup> *Id.* at 1092-1093.

<sup>21</sup> *Id.* at 1094-1095.

<sup>22</sup> *Id.* at 1101.

<sup>23</sup> *Id.*

<sup>24</sup> *Id.* at 1101.

<sup>25</sup> *Id.* at 1092,1097.

<sup>26</sup> *Id.* at 1094, citing *Trump v. O’Brien*, 958 A.2d 85 (N.J. Super. Ct. App. Div. 2008) (*Trump III*) (defendants did not have to disclose confidential source identities).

<sup>27</sup> *Id.* at 1099-1100.

<sup>28</sup> *Id.* at 1099.

<sup>29</sup> *Id.*

<sup>30</sup> *Id.* (emphasis added).

<sup>31</sup> Farhi, *supra* note 18.

<sup>32</sup> *Id.*

<sup>33</sup> *Makaeff v. Trump University, LLC*, 715 F.3d 254, 260 (9th Cir. 2013) (*Makaeff I*).

<sup>34</sup> *Id.*

<sup>35</sup> *Id.*

<sup>36</sup> Cal. Civ. Proc. Code § 425.16.

<sup>37</sup> *Id.* at 260-261, citing Cal. Civ. Proc. Code § 425.16.

<sup>38</sup> *Id.*

<sup>39</sup> *Id.* at 268, 271-272.

<sup>40</sup> *Makaeff v. Trump University, LLC*, No. 10-cv-00940, ECF No. 328 (S.D. Cal. June 17, 2014) (*Makaeff II*).

<sup>41</sup> *Makaeff v. Trump University, LLC*, No. 10-cv-00940, ECF No. 331 (S.D. Cal. April 9, 2015) (*Makaeff III*) (awarding \$790,083.40 in fees and \$8,695.81 in costs).

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- <sup>42</sup> *Makaeff v. Trump University, LLC*, No. 10-cv-00940 , ECF No. 472 (S.D. Cal. March 21, 2016) (*Makaeff IV*).
- <sup>43</sup> Maureen Groppe, *What Trump has said about Judge Curiel*, INDYSTAR (June 11, 2016), <http://www.indystar.com/story/news/2016/06/11/what-trump-has-said-judge-curiel/85641242/>
- <sup>44</sup> *Trump Lawyer Bragged: I 'Destroyed' a Beauty Queen's Life*, DAILY BEAST (July 31, 2015), <http://thedailybeast.com/articles/2015/07/31d/trump-lawyer-bragged-i-destroyed-a-beauty-queen-s-life.html>.
- <sup>45</sup> *Miss Universe L.P., LLLP v. Monnin*, 952 F.Supp.2d 591, 594 (S.D.N.Y. 2013) (*Monnin I*).
- <sup>46</sup> *Id.* at 594-95.
- <sup>47</sup> *Id.* at 595.
- <sup>48</sup> *Id.* at 596.
- <sup>49</sup> *Id.* at 597.
- <sup>50</sup> *Id.* at 603-606.
- <sup>51</sup> *Id.* at 598.
- <sup>52</sup> *Id.* at 598.
- <sup>53</sup> *Id.* at 600-610. *See also Miss Universe L.P., LLLP v. Monnin*, No. 12-cv-09174, ECF No. 17 (S.D.N.Y Feb. 5, 2013).
- <sup>54</sup> *Miss Universe L.P., LLLP v. Monnin*, No. 12-cv-09174, ECF No. 17 (S.D.N.Y Feb. 5, 2013).
- <sup>55</sup> *Miss Universe L.P., LLLP v. Monnin*, No. 12-cv-09174, ECF No. 1 (S.D.N.Y Dec. 17, 2012).
- <sup>56</sup> *Monnin I*, 952 F.Supp.2d at 610.
- <sup>57</sup> *Monnin v. Klineburger & Nussy*, No. L-4505-13 (Nov. 4, 2013 N.J. Super. Ct., Camden Cty); *see also* Joshua Alston, *Pageant Queen Blames NJ Firm For \$5M Miss Universe Win*, LAW360 (Nov. 8, 2013), <http://www.law360.com/articles/487678/pageant-queen-blames-nj-firm-for-5m-miss-universe-win>
- <sup>58</sup> Nick Penzenstadler, *Trump, Bill Maher and Miss Pennsylvania: The 'I'll sue you' effect*, USA TODAY (July 11, 2016), <http://www.usatoday.com/story/news/politics/elections/2016/2016/07/11/trump-bill-maher-and-miss-pennsylvania-ll-sue-you-effect/85877342/>; *see also Miss Universe L.P., LLLP v. Monnin*, No. 1:12-cv-09174, ECF No. 27 (S.D.N.Y Aug. 15, 2014).
- <sup>59</sup> *Trump v. Maher*, No. BC 499537 (Los Angeles Super. Ct. Feb. 4, 2013), [http://www.hollywoodreporter.com/sites/default/files/custom/Documents/ESQ/Trump\\_Maher.pdf](http://www.hollywoodreporter.com/sites/default/files/custom/Documents/ESQ/Trump_Maher.pdf).
- <sup>60</sup> *Id.*
- <sup>61</sup> *Id.*
- <sup>62</sup> *Id.*
- <sup>63</sup> *Id.* at Exhibit A.
- <sup>64</sup> *Id.*
- <sup>65</sup> Eriq Gardner, *Why Donald Trump is Likely to Lose a Lawsuit Against Bill Maher (Analysis)*, HOLLYWOOD REPORTER (Feb. 3, 2013), <http://hollywoodreporter.com/thr-esq-why-donald-trump-is-lose-417806>.
- <sup>66</sup> *Hustler*, 485 U.S. at 56-57.
- <sup>67</sup> *See* Cal. Civ. Code § 425.16(e)(4) (allowing defendant to bring anti-SLAPP motion to dismiss “a claim” arising from speech “in connection with a public issue or an issue of public interest”).

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<sup>68</sup> Eriq Gardner, *Donald Trump Withdraws Bill Maher Lawsuit*, HOLLYWOOD REPORTER (April 3, 2013), <http://hollywoodreporter.com/thr-esq-donald-trump-withdraws-bill-maher-432675>.

<sup>69</sup> *Trump Ruffin Commercial, LLC v. Local Joint Executive Board Las Vegas, Culinary Workers Union Local 226*, No. 15-cv-01984, ECF No. 1 (D. Nev. ).

<sup>70</sup> *Trump Ruffin Commercial, LLC v. Local Joint Executive Board Las Vegas, Culinary Workers Union Local 226*, No. 15-cv-01984, 2016 WL 4208437 (D. Nev. Aug. 8, 2016).

<sup>71</sup> *Trump Ruffin Commercial, LLC v. Local Joint Executive Board Las Vegas, Culinary Workers Union Local 226*, No. 15-cv-01984, ECF No. 21. (D. Nev. Aug. 17, 2016).

<sup>72</sup> *Miss Universe L.P., LLLP v. Univision Networks & Studios, Inc.*, No. 15-cv-05377, ECF No. 22 (S.D.N.Y. Nov. 6, 2015).

<sup>73</sup> *Id.*

<sup>74</sup> *Id.* (emphasis added).

<sup>75</sup> *Miss Universe L.P., LLLP v. Univision Networks & Studios, Inc.*, No. 15-cv-05377, ECF No. 25 (S.D.N.Y. Dec. 4, 2015).

<sup>76</sup> Nick Niedzwiadek, *Donald Trump, Univision Settle Lawsuit over Miss Universe Pageant*, WALL STREET JOURNAL (Feb. 11, 2016), <http://www.wsj.com/articles/donald-trump-univision-settle-lawsuit-over-miss-universe-pagaent-1455220440>; see also joint statement, <http://corporate.univision.com/2016/02/donald-j-trump-and-univision-reach-settlement/>

<sup>77</sup> Trump declared the following at his Feb. 26, 2016 campaign rally in Fort Worth, Texas: “I’m going to open up our libel laws so when they write purposely negative and horrible and false articles, we can sue them and win lots of money. We’re going to open up those libel laws. So when the *New York Times* writes a hit piece which is a total disgrace or when the *Washington Post*, which is there for other reasons, writes a hit piece, we can sue them and win money instead of having no chance of winning because they’re totally protected.” Hadas Gold, *Donald Trump: We’re going to ‘open up’ libel laws*, POLITICO (Feb. 26, 2016), <http://www.politico.com/blogs/on-media/2016/02/donald-trump-libel-laws-219866>

<sup>78</sup> *New York Times Co. v. Sullivan*, 376 U.S. 254, 279-80 (1964) (public official must prove actual malice to win libel case); *Gertz v. Robert Welch, Inc.*, 418 U.S. 323, 342, 346 (1974) (same for public figure).

<sup>79</sup> *E.g.*, Cal. Civ. Code § 425.16.

<sup>80</sup> State-by-state guide, Reporters Committee for Freedom of the Press, <https://www.rcfp.org/slapp-stick-fighting-frivolous-lawsuits-against-journalists/state-state-guide>

<sup>81</sup> *Makaeff III*, relying on Cal. Civ. Proc. Code § 425.16(c)(1) (“a prevailing defendant on a special motion to strike *shall* be entitled to recover his or her attorney’s fees and costs”) (emphasis added).

## ***Donald J. Trump Is A Libel Bully But Also A Libel Loser***

BY SUSAN E. SEAGER

Donald J. Trump is a libel bully. Like most bullies, he's also a loser, to borrow from Trump's vocabulary.

Trump and his companies have been involved in a mind-boggling 4,000 lawsuits over the last 30 years and sent countless threatening cease-and-desist letters to journalists and critics.<sup>1</sup>

But the GOP presidential nominee and his companies have never won a single speech-related case filed in a public court.

This article examines seven speech-related cases brought by Trump and his companies, which include four dismissals on the merits, two voluntary withdrawals, and one lone victory in an arbitration won by default. Media defense lawyers would do well to remind Trump of his sorry record in speech-related cases filed in public courts when responding to bullying libel cease-and-desist letters.

Trump's lawsuits are worthy of a comedy routine, as when Trump sued HBO comedian Bill Maher for suckering Trump into sending his birth certificate to prove he was not the "spawn" of an orangutan, and Trump hit back with a \$5-million breach-of-contract lawsuit, only to withdraw it after the *Hollywood Reporter* ridiculed it. Can anyone say *Hustler v. Falwell*?<sup>2</sup>

Orangutans and joking aside, this examination of Trump's libel losses also provides a powerful illustration of why more states need to enact anti-SLAPP laws to discourage libel bullies like Trump from filing frivolous lawsuits to chill speech about matters of public concern and run up legal tabs for journalists and critics.

### **A. Trump Sues Architecture Critic**

Trump filed his first and crankiest libel lawsuit in 1984 against the *Chicago Tribune* and the newspaper's Pulitzer Prize-winning architecture critic, Paul Gapp. Trump filed his libel lawsuit in the U.S. District Court in the Southern District of New York.<sup>3</sup> Trump claimed he suffered \$500 million in damages.<sup>4</sup>

Gapp, who won the Pulitzer Prize for criticism in 1979, dared to publish a "Design" column in the *Sunday Tribune Magazine* on August 12, 1984 ridiculing Trump's proposal to build the tallest building in the world: a 150-story, nearly 2,000-foot tall skyscraper on a landfill at the southeast end of Manhattan.<sup>5</sup>

Gapp wrote that Trump's planned office tower was "one of the silliest things anyone could inflict on New York or any other city" and a kind of "Guinness Book of World Records architecture." Gapp's column said the "only remotely appealing aspect" of Trump's planned office tower was that it would "not be done in the Fence Post Style of the 1970s." The architect critic slammed

the already-built Trump Tower as a “skyscraper offering condos, office space and a kitschy shopping atrium of blinding flamboyance.” Gapp wrote that Trump’s claim that the 150-story skyscraper would architecturally balance the two World Trade Center towers on the opposite side of lower Manhattan was mere “eyewash.”<sup>6</sup>

Gapp also gave an interview to the *Wall Street Journal*, telling a reporter that Trump’s plan was “aesthetically lousy” and complaining that the central part of Chicago “has already been loused up by giant-ism.”

Trump filed a libel lawsuit in New York, claiming that Gapp’s criticisms in the *Tribune* and the *Journal* were false and defamatory.

Trump added an implication allegation, alleging that the *Tribune* artist’s conception of his planned building made the proposed skyscraper look like “an atrocious, ugly monstrosity” – injecting words that were never used by Gapp – and claimed that Gapp’s statements and the *Tribune* illustration “torpedoed his plans” to build the office tower.<sup>7</sup>

The *Tribune* and Gapp filed a Rule 12(b)(6) motion to dismiss on the grounds that Gapp’s statements and the artist’s rendering were protected opinions, and U.S. District Judge Edward Weinfeld agreed, granting the motion to dismiss.<sup>8</sup>

Judge Weinfeld gave Trump a lesson in the First Amendment and politics: “Men in public life ... must accept as an incident of their service harsh criticism, oftentimes unfair and unjustified – at times false and defamatory – and this is particularly so when their activities or performance may ... stir deep controversy” .... “*De gustibus non est disputandum*, there is no disputing about tastes.”<sup>9</sup>

Judge Weinfeld, then 84, reaffirmed the First Amendment rule that “[e]xpressions of one’s opinion of another, however unreasonable, or vituperative, since they cannot be subjected to the test of truth or falsity, cannot be held libelous and are entitled to absolute immunity from liability under the First Amendment.”<sup>10</sup>

Judge Weinfeld explained that opinions expressed in the form of “rhetorical hyperbole,” “rigorous epithets,” and “the most pejorative of terms” are protected from liability, so long as the opinions do not veer to into factual accusations, such as accusing someone of a crime, unethical conduct, or the lack of professional integrity in a manner that would be proved true or false.<sup>11</sup>

Judge Weinfeld stated that “this court has no doubt that the statements contained in the *Tribune* article are expressions of opinion.”<sup>12</sup> The court held that the “Design” heading and title “architecture critic” informed the reader that the article “embodies commentary” and is “cast in subjective terms,” especially since calling a building “one of the silliest things” and not “appealing” are “highly personal and subjective” judgments.” While “many ... would disagree with Mr. Gapp’s view ... there is no way the Court could instruct a jury on the process of evaluating whether [a] statement is true” when it comes to such “aesthetic matters.”<sup>13</sup>

The court also rejected Trump's claim that the Tribune artist's rendering of the proposed tower was "false" because it allegedly misrepresented his architectural plan.

Judge Weinfeld held that the sketch was not factual because it was described as an "artist's conception" and even if the drawing did imply that the planned 150-story tower was "an atrocious, ugly monstrosity," this is "precisely the same sort of individual, subjective aesthetic opinion" that is not capable of being subjected to "factual proof."<sup>14</sup>

The court also called out Trump's doublespeak to which the American public is now quite familiar.

Trump argued that the artist's illustration in the *Tribune* did not accurately depict "his proposal" for the building's specific "tapered" design, but "at the same time" Trump was "equally vehement in declaring that he has no plans and has not even engaged an architect." Judge Weinfeld said: "Plaintiff cannot have it both ways."<sup>15</sup>

Of course this was not painless victory for the *Chicago Tribune*; it spent \$60,000 in legal fees to win the motion to dismiss.<sup>16</sup>

New York's anti-SLAPP statute is limited to claims arising from the right to petition the government, and does not protect speech outside of government proceedings, so the Tribune and Gapp could not use the statute to dismiss the libel claim. If New York had a SLAPP statute that protected speech about matters of public concern, the *Tribune* and Gapp could have argued that they were being sued over speech about a matter of public concern and brought a quick motion to dismiss based on their absolute immunity for opinion and sought reimbursement of their \$60,000 in legal fees from Trump.<sup>17</sup>

## **B. Trump Sues Book Author for Saying He Is Not a Billionaire**

Trump's next big libel lawsuit was filed in New Jersey state court more than 20 years later.

This time, Trump alleged a whopping \$5 billion in damages<sup>18</sup> in his 2006 libel lawsuit against book author Timothy O'Brien and his book publishers, Time Warner Book Group, Inc. and Warner Books, Inc.<sup>19</sup>

Trump's lawsuit claimed that O'Brien's 2005 book, *TrumpNation, The Art of Being The Donald*, falsely reported that Trump was "only" worth between \$150 million to \$250 million, nowhere near the net worth claimed by Trump, which ranged from \$4 billion to \$5 billion to \$6 billion to \$9.5 billion.<sup>20</sup> Trump sued for libel, claiming he was really, really worth billions of dollars.

Once again, Mr. Trump saw his libel lawsuit tossed out of court, this time by New Jersey Superior Court Judge Michele M. Fox, who granted the defendants' motion for summary judgment based on no actual malice, which was affirmed by a New Jersey appellate court.<sup>21</sup> "Nothing suggests that O'Brien was subjectively aware of the falsity of his source's figures or that he had actual doubts as to the information's accuracy," the New Jersey appellate court ruled.<sup>22</sup>

The appellate court concluded that “there is no doubt that Trump is a public figure” and that he failed to meet his burden of proving the book’s statements about his net worth millions was false was published with actual malice.<sup>23</sup> “Nothing suggests that O’Brien was subjectively aware of the falsity of his source’s figures or that he had actual doubts as to the information’s accuracy,” the New Jersey appellate court ruled.<sup>24</sup>

The court held that O’Brien, an experienced financial reporter and then the *Sunday Business* section editor at the *New York Times*, relied on three confidential sources who gave “remarkably similar” estimates of Trump’s actual net worth of between \$150 million to \$250 million.<sup>25</sup>

Earlier in the litigation, a different trial court judge ordered O’Brien to produce the names of his confidential sources, but the New Jersey appellate court reversed, holding that the New Jersey’s qualified reporter’s privilege protected O’Brien’s right to keep the identities of his confidential sources.<sup>26</sup> O’Brien produced his notes from his interviews of those confidential sources in discovery, however.

The appellate court also rejected Trump’s argument that O’Brien published with knowing falsity because O’Brien rejected the financial information provided by Trump before the book was published.

The court found that “it is undisputable that Trump’s estimates of his own worth changed substantially over time and thus [Trump] failed to provide a reliable source” to O’Brien to rebut the confidential sources.<sup>27</sup>

Trump and his accountant were their own worst enemies in their depositions. The accountant who prepared Trump’s 2004 Statement of Financial Condition admitted at his deposition that he never verified whether Trump had been honest in listing all his debts and liabilities for the accountant’s report, which Trump had provided to O’Brien for the book.<sup>28</sup>

Trump was even more unreliable in his testimony about his net worth:

Q: Now Mr. Trump, have you always been completely truthful in your public statements about your net worth of properties?

A: I try.

Q: Have you ever been not truthful?

A: My net worth fluctuates, and it goes up and down with markets and with attitudes and feelings, even my own feelings but I try.

Q: Let me just understand that a little bit. Let’s talk about that for a second. You said that the net worth goes up and down based on your own feelings?

A: Yes ....<sup>29</sup>

The court concluded that “Trump’s estimates of his own worth changed substantially over time and *thus failed to provide ... reliable*” evidence that proved O’Brien’s book false.<sup>30</sup> In other words, Trump ran to the court complaining that the book falsely debunked Trump’s claim of being a billionaire but utterly failed to provide any reliable evidence to prove falsity.

Trump later complained about the dismissal of the lawsuit, displaying his misunderstanding of the law of public figure and actual malice. “Essentially, the judge just said, ‘Trump is too famous,’” he told the Atlantic magazine in 2013. “‘He’s so famous that you’re allowed to say anything you want about him.’”<sup>31</sup> No wonder Trump wants to change libel law; he doesn’t understand it.

Trump later boasted to the *Washington Post* that he didn’t mind losing after five years of litigation. “I spent a couple of bucks on legal fees but they spent a whole lot more. I did it to make [O’Brien’s] life miserable, which I’m happy about.”<sup>32</sup>

That, ladies and gentlemen, is a paradigm SLAPP lawsuit: good at harassing and draining the bank accounts of critics, but ultimately a loser in court. New Jersey does not have an anti-SLAPP statute.

### **C. Trump University Sues Former Student**

In 2010, Trump switched gears and filed a libel suit on behalf of Trump University, his for-profit real estate “school.” Trump U filed a \$1-million libel lawsuit in 2010 in the U.S. District Court for the Southern District in San Diego against Tarla Makaeff, a former Trump U student, yoga instructor, and whistleblower.<sup>33</sup>

Trump U filed its libel lawsuit against Makaeff after she filed a class-action lawsuit as the lead plaintiff against Trump U and Trump for alleged deceptive business practices. In her class-action lawsuit, she claimed she was tricked into raising her credit card limit, ostensibly to buy real estate, but then Trump U persuaded her to use her credit card to pay nearly \$35,000 to enroll in an “elite” Trump U class.<sup>34</sup>

Trump U sued Makaeff for her pre-litigation statements about Trump U when she posted on internet message boards and wrote a letter to the Better Business Bureau and her bank requesting a \$5,100 refund for services charged by Trump U. Trump U claimed that she defamed the school by claiming in her letters that that Trump U and its affiliates engaged in “fraudulent business practices,” “deceptive business practices,” “grand larceny,” “predatory behavior,” “criminal” business practices, and used “trickery” and “fraud” to persuade her to open a new credit card, which she called “grand larceny” and “identity theft.”<sup>35</sup>

Makaeff took advantage of California’s anti-SLAPP statute to file a special motion to strike Trump U’s libel counterclaim. The California statute allows defendants to bring quick motions to strike speech-related claims that target speech about a matter of public concern and are meritless because the plaintiff cannot show a probability of prevailing.<sup>36</sup>



Makaeff argued that Trump U’s claim was subject to dismissal under the two-part test of the anti-SLAPP statute because: (1) the claim arose from her exercise of speech about a matter of public concern – Trump U’s deceptive business practices and her statements about consumer protection; and (2) Trump U could not show a “probability of prevailing” on the merits of the defamation claim because Trump U was a public figure lacking evidence that Makaeff published with actual malice.<sup>37</sup>

U.S. District Judge Irma Gonzalez, who was initially assigned to the case, held that Trump U’s libel claim came under the protection of the anti-SLAPP statute because the claim arose from Makaeff’s statements about “consumer protection information,” which was a matter of public concern. But Judge Gonzalez denied Makaeff’s anti-SLAPP motion on the grounds that Trump U was not a public figure and had established a probability of prevailing on its libel claim under the negligence standard for private figures.<sup>38</sup>

The Ninth Circuit Court of Appeals affirmed the lower court’s holding that Trump U’s libel claim came under the protection of the anti-SLAPP statute, but reversed the lower court’s holding that Trump U was a private figure, and held that the for-profit school is a limited purpose public figure due to its use of “aggressive advertising campaign” on the internet, newspapers, and radio, and sent the case back to the district court to decide if Trump U could prove actual malice.<sup>39</sup>

On remand, the case was assigned to U.S. District Judge Gonzalo P. Curiel, who granted Makaeff’s anti-SLAPP motion and dismissed Trump’s \$1-million libel claim in 2014. The court held that Trump U could not meet his burden of showing a probability of prevailing because Makaeff believed the truth of her statements and Trump lacked evidence that Makaeff’s statements were made with actual malice.<sup>40</sup>

The court also ordered Trump U to pay nearly \$800,000 for Makaeff’s attorney’s fees and costs.<sup>41</sup> The legal fees order is on hold pending the outcome of the class action lawsuit.

Six years into her class-action lawsuit, which has still not gone to trial, Makaeff was shell-shocked how she had been “put through the wringer,” developed health problems, and was having a hard time finding work due to the high-profile nature of the case, and she was permitted by Judge Curiel to withdraw as lead plaintiff in 2016.<sup>42</sup>

As for Judge Curiel, he has been subjected to repeated verbal attacks by Trump, who called the judge “a hater of Donald Trump” with “hostility toward me.” Trump incorrectly claimed that the Indiana-born Latino judge was “Spanish” and “Mexican” and contends that the judge is biased against Trump due to his campaign pledge to build a wall between the United States and Mexico. Trump never filed a recusal motion, and has hinted that he might bring a “civil” lawsuit against Curiel after the election.<sup>43</sup>

#### **D. Trump Sues Miss Pennsylvania**

Trump’s corporate lawyer Michael Cohen recently cited the sole Trump & Co. defamation victory – a default judgment – to bully another reporter.

“Do you want to destroy your life?” Cohen asked a *Daily Beast* reporter last year. “It’s going to be my privilege to serve it to you on a silver platter like I did that idiot from Pennsylvania in Miss USA, because I think you are dumber than she is.” Cohen said. “Sheena Monnin, another one that wanted to defame Mr. Trump and ended up with a \$5 million judgment. That’s going to be nothing compared to what I do to you.... So I’m warning you, tread very fucking lightly, because what I’m going to do to you is going to be fucking disgusting. You understand me?”<sup>44</sup>

Monnin, a former Miss Pennsylvania, tangled with Trump when she entered the 2012 Miss USA Pageant along with 50 other contestants, and was soon eliminated.<sup>45</sup>

While waiting in the wings during the telecast, Monnin claims that another contestant confided that she had seen a list of the five finalists and the ultimate winner – Miss Rhode Island – and the outcome had been predetermined by pageant officials.<sup>46</sup>

The next day, Monnin told her agent she was resigning from her post as 2012 Miss Pennsylvania and from the Miss Universe pageant because she believed the Miss USA pageant was “rigged” and because she did not agree with the pageant’s decision to allow transgendered contestants.

Monnin posted on her Facebook page about her resignation, saying she was quitting “an organization I consider to be fraudulent, lacking in morals, inconsistent and in many ways trashy.”<sup>47</sup> The next day, Monnin posted on her Facebook page the details about the reputed list, saying the “show must be rigged” and was “dishonest.”<sup>48</sup>

Trump, who helps run the Miss USA pageant as an equity partner with the Miss Universe L.P. company, quickly escalated the dispute by appearing on *Good Morning America* to refute Monnin’s Facebook claims, saying she had “loser’s remorse” and that her allegations were “disgraceful.” Monnin responded by appearing on *The Today Show* to explain and repeat her allegations from her Facebook page.

Trump’s Miss Universe pageant filed a \$10-million claim against Monnin with JAMS, the private arbitration service mandated by Monnin’s Miss USA contract, asserting claims against Monnin for defamation, tortious interference with prospective economic advantage, and breach of contract.<sup>49</sup>

Monnin said she got bad advice from her lawyer, who repeatedly told her that she was not required to attend the arbitration, only to tell Monnin later that he could not represent her because he was not admitted to practice law in New York.<sup>50</sup>

With Monnin and her attorney absent from the arbitration proceeding, no one provided any evidence to rebut testimony that Miss USA supposedly suffered \$5 million in damages because the oil company BP, formerly known as British Petroleum, allegedly backed out of its reputed plan to provide a \$5-million sponsorship fee due to BP’s alleged concern about Monnin’s allegations.<sup>51</sup>

The JAMS arbitrator, retired U.S. Magistrate Judge Theodore H. Katz, held that Monnin’s statements were false, defamatory, and published “with actual malice,” and awarded the Miss

Universe company its full \$5 million defamation damages claim.<sup>52</sup> The arbitrator dismissed the tortious interference and contract claims.

Monnin filed a motion in the U.S. District Court for the Southern District of New York to vacate the \$5-million defamation award, arguing that Monnin failed to receive proper notice of the arbitration, received ineffective counsel from her lawyer, the arbitrator exceeded his authority and exhibited “manifest disregard for the law” by finding liability without any evidence that BP cited Monnin’s comments as the reason for withdrawing its planned pageant sponsorship.<sup>53</sup>

As Monnin pointed out, the arbitrator awarded the full \$5-million sponsorship fee award to Trump’s pageant company even though no one from BP testified at the arbitration. The arbitrator relied solely on hearsay testimony from a Miss USA pageant employee who testified that BP withdrew its \$5 million sponsorship fee.<sup>54</sup>

Although this was not raised by Monnin, the arbitrator appeared to apply the negligence standard instead of the required actual malice standard when he cited the following evidence of Monnin’s actual malice: she made “malicious” statements as a “disgruntled contestant,” her “rigged” allegation was “highly improbable,” she “made no attempt to seek verification” of her claim with other sources, she failed to respond to discovery demands, failed to appear to argue the truth of her statements, and lost by default.<sup>55</sup>

On July 2, 2013, U.S. District Judge J. Paul Oetken rejected all of Monnin’s challenges and affirmed the arbitrator’s \$5 million default judgment. While Judge Oetken expressed “[s]ympathy” that Monnin “is suffering from her poor choice of counsel” and agreed that her lawyer acted “unconscionably,” he declined to vacate the judgment because the arbitrator relied on evidence to support his decision and the “apparent inequity” of the default judgment was not enough for the federal court vacate the judgment under the very protective rules for arbitration awards.<sup>56</sup>

Monnin later sued her former New Jersey lawyer for malpractice in Camden County (New Jersey) Superior Court in 2013,<sup>57</sup> and her father, Phillip Monnin, contends his daughter did not pay “a penny” of the \$5 million judgment when Trump’s attorney filed a notice of satisfaction of the full \$5 million *Miss Universe L.P. v. Monnin* arbitration award.<sup>58</sup>

For Trump to boast about winning this arbitration claim is misleading. The arbitrator never heard any rebuttal to the factual allegations and legal theories made by Trump’s pageant company, the judgment was not subject to the full appellate review available to litigants in public courts, and Monnin’s attorney acted “unconscionably.”

### **E. Trump Sues Maher About Orangutan Joke**

Trump has zero sense of humor. But, boy, can he file a hilarious lawsuit! He proved that much when he sued HBO *Real Time* cable television show host Maher for not making good on Maher’s *joke* that Maher would donate \$5 million to charity if the orange-haired and orange-tinged Trump could provide a birth certificate showing that Trump was not the “spawn of his mother having sex with an orangutan.”<sup>59</sup>

At the time, Trump was exploring a run for the GOP presidential nomination and Maher made his donation joke as part of his political comedy shtick ridiculing Trump's "racist" and false "birther" claim that President Obama, our first African American president, was born in Kenya, not the United States, and Trump's offer to pay \$5 million to charity if Obama produced his birth certificate.<sup>60</sup>

Trump's lawyer responded by sending Maher a copy of Trump's birth certificate, "demonstrating he is the son of Fred Trump, not an orangutan," and a "formal acceptance" letter directing Maher to divvy up his \$5 million donation among five charities.<sup>61</sup>

When Maher did not cut a donation check, Trump filed a \$5-million "breach of contract" lawsuit in Los Angeles Superior Court against Maher.<sup>62</sup> Exhibit A of his lack of a sense of humor (literally it was Exhibit A): Trump attached a transcript of Maher's appearance on the *Tonight Show with Jay Leno* to prove Trump thought Maher's offer was serious, including Maher's offer to "donate to a charity of his choice .... Hair Club for Men, The Institute for Incurable Douche-bag-ery. Whatever charity!"<sup>63</sup>

Trump thought it was important to state in his lawsuit that a 2011 *Newsweek* poll showed he would "enjoy the support of 41% of voters in a hypothetical race against President Obama."<sup>64</sup>

Trump was roundly ridiculed by the *Hollywood Reporter* for filing such a frivolous lawsuit.<sup>65</sup>

It was obvious to media lawyers that Maher could seek a quick dismissal under the U.S. Supreme Court decision *Hustler*, which held that statements about a public figure reasonably understood to be a caricature, parody, or satire – a joke – are not actionable under any theory of liability claiming a falsehood.<sup>66</sup>

Maher also had a very good chance of winning an anti-SLAPP motion under California's anti-SLAPP statute. Although Trump's lawsuit against Maher was labeled a "breach of contract" lawsuit, Trump's lawsuit targeted Maher's speech about a matter of public concern – Maher's critique of Trump's "racist," anti-Obama birther campaign while Trump explored a presidential bid<sup>67</sup> As it turns out, Trump's birther campaign likely helped catapult Trump to the GOP presidential nomination three years later.

Shortly after filing his frivolous lawsuit against Maher, Trump quickly withdrew it, and his lawyer said he would refile an amended complaint.<sup>68</sup> He never did.

## **F. Trump Hotel Sues Bartender and Culinary Unions**

By 2015, Trump was an actual GOP candidate for the presidential nomination and more aggressive in using lawsuits to chill negative speech about him. He was probably fed up with losing libel claims and being blocked by the First Amendment and became more creative trying to avoid the defamation label and his old foe, the First Amendment.

On October 5, 2015, Trump gave a campaign speech at the Treasure Island Hotel & Casino, a rival hotel. Outside the hotel, culinary workers and bartenders trying to organize a union at the Trump Hotel Las Vegas handed out flyers saying that Treasure Island Hotel & Casino employed unionized workers while Trump “refused to agree to a fair process for workers at his hotel to form a union.” The workers’ flyers asked “If Trump choses to stay at a union hotel, why can’t Trump Hotel workers choose to form a union.”

Trump sued the culinary and bartender labor unions that organized the protest in U.S. District Court in the District of Nevada, claiming the flyers hurt his hotel’s reputation by falsely implying that he had not stayed at his own hotel due to lesser quality. Instead of suing for libel, the companies sued the unions for violating Section 43(a) of the federal Lanham Act for alleged false advertising and for violating Nevada’s deceptive trade practices law. Trump sued in the name of his hotel companies, Trump Ruffin Commercial LLC and Trump Ruffin Tower I LLC.<sup>69</sup>

There was just one problem with the Trump hotel lawsuit, according to Chief U.S. District Court Judge Gloria M. Navarro. To make out a case for false advertising, Trump’s hotel needed to allege that the workers’ allegedly false statements were “commercial speech,” that is, to propose a commercial transaction.

The court found that even if the workers’ statements were “intended to, and would have the tendency to cause harm to the reputation of Trump Hotel Las Vegas,” the workers’ statements did not qualify as commercial speech under the Lanham Act because they were not proposing a commercial transaction.

Judge Navarro dismissed the Lanham Act claim without prejudice on August 8, 2016, holding that Trump’s hotel companies failed to allege that the labor unions were engaged in commercial speech, and dismissed the state law claim due to lack of jurisdiction.<sup>70</sup> The Trump hotel companies chose not to file an amended complaint and voluntarily dismissed the lawsuit,<sup>71</sup> and the court closed the case.

Once again, Trump’s attempt to escape the burdens of libel law and the First Amendment by pleading a non-libel claim failed.

### **G. Trump Sues to Make Clear He Is Not a Racist Mass Murderer**

Not only does Trump lack a sense of humor, he doesn’t know from rhetorical hyperbole. We got the message loud and clear from Trump’s \$2.5 billion lawsuit against television network Univision Networks & Studios, Inc. and its programming chief Albert Ciurana.

In his 2015 lawsuit, Trump filed claims for breach of contract, intentional interference with contractual relationships, and defamation arising from the Spanish-language network’s decision to stop airing Trump’s beauty pageants after Trump stated during his presidential campaign announcement that Mexican immigrants were “rapists” and criminals.

Trump alleged that he was defamed to the tune of \$1 billion by Ciurana’s Instagram post of Trump’s photo side-by-side with a photo of accused Southern white supremacist mass murderer

Dylann Roof with the caption “Sin commentaries,” or “No comments.”<sup>72</sup> Ciurana posted the Instagram photos shortly after Trump’s “rapists” and criminals statement, and later apologized.

Trump claimed that given the “target audience” of Ciurana’s post, “a reasonable person could understand Mr. Ciurana to be stating that Mr. Trump had committed heinous acts similar to Roof, and/or that Mr. Trump had incited others to commit similar heinous acts.”<sup>73</sup>

Without an ounce of irony, Trump wanted to make it clear in his lawsuit that he is not a racist mass murderer: “This statement [the alleged implication of the Instagram post] is patently false,” Trump alleged, “because as Defendants well knew (*or should have known*) at the time (*and still*) Mr. Trump has never committed heinous acts similar to Roof’s and never incited Roof or anyone else to commit such heinous acts.”<sup>74</sup>

Univision and Ciurana filed a motion to dismiss, arguing that the Instagram post was not a statement of fact, but a “visual satire” and an expression of a personal opinion by Ciurana, a Mexican immigrant himself, about Trump’s qualifications as a candidate for president, which is quintessential political speech protected by the First Amendment. The defendants chided Trump for not remembering that he lost his first defamation case against the *Chicago Tribune* for failing to understand the protection of opinion.

Univision and Ciurana also argued that the satirical post simply compared the two men’s similar frowns and hair, and that it would be a “stretch” and “far from plausible” that the post conveyed that both Roof and Trump “hold comparably racist views,” but even if that was the message, this message still would be protected opinion.<sup>75</sup> The breach of contract claim was frivolous, Univision argued, because Trump had already breached the contract by pushing away all the advertisers and viewers of the planned first-ever Spanish-language version of Trump’s beauty pageants with his offensive comments about Mexican immigrants who formed a large part of the Univision audience.

Shortly before oral argument on the motion to dismiss, Trump and co-plaintiff Miss Universe L.P., LLLP filed a notice of voluntary dismissal of their lawsuit with prejudice on Feb. 11, 2016, depriving us of what promised to be a very interesting oral argument. The parties announced a confidential settlement of the lawsuit but only mentioned the settlement of the contract claim,<sup>76</sup> so I count the dismissal of the defamation claim as another loss to Trump.

### **More Anti-SLAPP Statutes Are Needed**

Trump has pledged to get revenge on the First Amendment. Trump has promised “to open up our libel laws so when they write purposely negative and horrible and false articles, we can sue them and win lots of money.”<sup>77</sup>

Trump’s campaign pledge misrepresents and misunderstands libel law. The First Amendment already punishes “purposely . . . false articles” about powerful public figures like Trump and his companies. It’s called publishing with actual malice.<sup>78</sup> Trump has never been able to prove actual malice in a public trial court.

Trump’s speech-targeting lawsuits filed in public courts were doomed to failure because the First Amendment protects good-faith reporting about public figures (that is, published without actual malice) and immunizes subjective opinions and jokes, even if they are “negative” and “horrible,” as Trump complains.

Journalists and whistleblowers may have won dismissal of Trump’s libel lawsuits, but at significant cost of time, energy, and money.

State legislatures should enact more anti-SLAPP statutes allowing defendants to quickly dismiss meritless lawsuits targeting speech about matters of public concern.<sup>79</sup> Over two dozen states have enacted these statutes.<sup>80</sup> A federal anti-SLAPP law has been proposed. Many state statutes require plaintiffs like Trump to pay the prevailing defendant’s legal fees, as Trump University discovered in California when the court granted a former student’s anti-SLAPP motion dismissing the school’s flawed libel claim and ordered Trump University to pay nearly \$800,000 in attorney’s fees.<sup>81</sup> A federal anti-SLAPP law has been proposed.

These anti-SLAPP laws, while not perfect, would help discourage frivolous libel lawsuits favored by Trump & Co. Instead of labeling frivolous, speech-targeting lawsuits “SLAPP suits,” perhaps we should call them “Trump Suits.”

*Susan Seager is a First Amendment attorney who teaches media law to journalism students at the University of Southern California.*

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<sup>1</sup> A 2016 study by *USA TODAY* located over 4,000 lawsuits filed by or against Trump and his companies over three decades, an unprecedented number for a presidential nominee. *USA TODAY* located seven speech-related lawsuits or arbitrations filed by Trump and his companies. *USA TODAY Network: Dive into Donald Trump’s thousands of lawsuits*, USA TODAY, <http://usatoday.com/pages/interactives/trump-lawsuits/>, Nick Penzenstadler, *New USA TODAY interactive database shows Trump lawsuits surpass 4,000*, USA TODAY (July 7, 2016), <http://www.usatoday.com/story/news/politics/onpolitics/2016/07/07new-usa-today-interactive-database-shows-trump-lawsuits-surpass-4000/86809010/>. This article examines the seven speech-related lawsuits or arbitration proceedings brought by Trump and his companies discussed by USA TODAY and located in an independent search by the author.

<sup>2</sup> 485 U.S. 46, 56-57 (1988) (statements not reasonably understood as stating facts – in this instance a parody liquor-and-sex advertisement in *Hustler* magazine poking fun at the Rev. Jerry Falwell – are not actionable under any theory of liability based on an alleged “false” publication, even if the statements are “offensive” and “vulgar”).

<sup>3</sup> *Trump v. Chicago Tribune Co.*, 616 F. Supp. 1434 (S.D.N.Y. 1985) (*Trump I*).

<sup>4</sup> Nat Hentoff, *Citizen Trump*, WASH. POST (Oct. 19, 1985), <http://www.washingtonpost.com/archive/politics/1985/10/19/citizen-trump/88efc4ba-6c1e-4226-8924-4101-a60f5478/>

<sup>5</sup> *Trump I*, 616 F. Supp. at 1434.

<sup>6</sup> *Id.* at 1435.

<sup>7</sup> *Id.*

<sup>8</sup> *Id.* at 1436.

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<sup>9</sup> *Id.*

<sup>10</sup> *Id.* at 1435 (citations and quotations omitted).

<sup>11</sup> *Id.*, citing *Letter Carriers v. Austin*, 418 U.S. 264, 284 (1974) and *Greenbelt Pub. Assn v. Bresler*, 398 U.S. 6, 14 (1970). Although Judge Weinfeld’s decision in *Trump v. Chicago Tribune Co.* was issued in 1985, before the U.S. Supreme Court narrowed its protection for opinions in *Milkovich v. Lorain Journal Co.*, 497 U.S. 1 (1990), Judge Weinfeld’s decision was based on the protection for non-factual, hyperbolic opinions and remains good law.

<sup>12</sup> *Trump I*, 616 F. Supp. at 1436.

<sup>13</sup> *Id.*

<sup>14</sup> *Id.* at 1438.

<sup>15</sup> *Id.*

<sup>16</sup> Hentoff, *supra* note 4.

<sup>17</sup> SLAPP suits are meritless lawsuits that target speech about a matter of public concern. SLAPP is an acronym for Strategic Litigation Against Public Participation. *See generally* Cal. Civ. Proc. Code § 425.16.

<sup>18</sup> Paul Farhi, *What really gets under Trump’s skin? A reporter questioning his net worth*, WASH. POST (March 8, 2016), [https://www.washingtonpost.com/lifestyle/style/that-time-trump-sued-over-the-size-of-hiswallet/2016/03/08/785dee3ee-e4c2-11e5-bofd-073d5930a7b7\\_story.html](https://www.washingtonpost.com/lifestyle/style/that-time-trump-sued-over-the-size-of-hiswallet/2016/03/08/785dee3ee-e4c2-11e5-bofd-073d5930a7b7_story.html)

<sup>19</sup> *Trump v. O’Brien*, 29 A.3d 1090, 1092 (N.J. Super. Ct. App. Div. 2011) (*Trump II*).

<sup>20</sup> *Id.* at 1092-1093.

<sup>21</sup> *Id.* at 1094-1095.

<sup>22</sup> *Id.* at 1101.

<sup>23</sup> *Id.*

<sup>24</sup> *Id.* at 1101.

<sup>25</sup> *Id.* at 1092,1097.

<sup>26</sup> *Id.* at 1094, citing *Trump v. O’Brien*, 958 A.2d 85 (N.J. Super. Ct. App. Div. 2008) (*Trump III*) (defendants did not have to disclose confidential source identities).

<sup>27</sup> *Id.* at 1099-1100.

<sup>28</sup> *Id.* at 1099.

<sup>29</sup> *Id.*

<sup>30</sup> *Id.* (emphasis added).

<sup>31</sup> Farhi, *supra* note 18.

<sup>32</sup> *Id.*

<sup>33</sup> *Makaeff v. Trump University, LLC*, 715 F.3d 254, 260 (9th Cir. 2013) (*Makaeff I*).

<sup>34</sup> *Id.*

<sup>35</sup> *Id.*

<sup>36</sup> Cal. Civ. Proc. Code § 425.16.

<sup>37</sup> *Id.* at 260-261, citing Cal. Civ. Proc. Code § 425.16.

<sup>38</sup> *Id.*

<sup>39</sup> *Id.* at 268, 271-272.

<sup>40</sup> *Makaeff v. Trump University, LLC*, No. 10-cv-00940, ECF No. 328 (S.D. Cal. June 17, 2014) (*Makaeff II*).

<sup>41</sup> *Makaeff v. Trump University, LLC*, No. 10-cv-00940, ECF No. 331 (S.D. Cal. April 9, 2015) (*Makaeff III*) (awarding \$790,083.40 in fees and \$8,695.81 in costs).



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- <sup>42</sup> *Makaeff v. Trump University, LLC*, No. 10-cv-00940 , ECF No. 472 (S.D. Cal. March 21, 2016) (*Makaeff IV*).
- <sup>43</sup> Maureen Groppe, *What Trump has said about Judge Curiel*, INDYSTAR (June 11, 2016), <http://www.indystar.com/story/news/2016/06/11/what-trump-has-said-judge-curiel/85641242/>
- <sup>44</sup> *Trump Lawyer Bragged: I 'Destroyed' a Beauty Queen's Life*, DAILY BEAST (July 31, 2015), <http://thedailybeast.com/articles/2015/07/31d/trump-lawyer-bragged-i-destroyed-a-beauty-queen-s-life.html>.
- <sup>45</sup> *Miss Universe L.P., LLLP v. Monnin*, 952 F.Supp.2d 591, 594 (S.D.N.Y. 2013) (*Monnin I*).
- <sup>46</sup> *Id.* at 594-95.
- <sup>47</sup> *Id.* at 595.
- <sup>48</sup> *Id.* at 596.
- <sup>49</sup> *Id.* at 597.
- <sup>50</sup> *Id.* at 603-606.
- <sup>51</sup> *Id.* at 598.
- <sup>52</sup> *Id.* at 598.
- <sup>53</sup> *Id.* at 600-610. *See also Miss Universe L.P., LLLP v. Monnin*, No. 12-cv-09174, ECF No. 17 (S.D.N.Y Feb. 5, 2013).
- <sup>54</sup> *Miss Universe L.P., LLLP v. Monnin*, No. 12-cv-09174, ECF No. 17 (S.D.N.Y Feb. 5, 2013).
- <sup>55</sup> *Miss Universe L.P., LLLP v. Monnin*, No. 12-cv-09174, ECF No. 1 (S.D.N.Y Dec. 17, 2012).
- <sup>56</sup> *Monnin I*, 952 F.Supp.2d at 610.
- <sup>57</sup> *Monnin v. Klineburger & Nussy*, No. L-4505-13 (Nov. 4, 2013 N.J. Super. Ct., Camden Cty); *see also* Joshua Alston, *Pageant Queen Blames NJ Firm For \$5M Miss Universe Win*, LAW360 (Nov. 8, 2013), <http://www.law360.com/articles/487678/pageant-queen-blames-nj-firm-for-5m-miss-universe-win>
- <sup>58</sup> Nick Penzenstadler, *Trump, Bill Maher and Miss Pennsylvania: The 'I'll sue you' effect*, USA TODAY (July 11, 2016), <http://www.usatoday.com/story/news/politics/elections/2016/2016/07/11/trump-bill-maher-and-miss-pennsylvania-ll-sue-you-effect/85877342/>; *see also Miss Universe L.P., LLLP v. Monnin*, No. 1:12-cv-09174, ECF No. 27 (S.D.N.Y Aug. 15, 2014).
- <sup>59</sup> *Trump v. Maher*, No. BC 499537 (Los Angeles Super. Ct. Feb. 4, 2013), [http://www.hollywoodreporter.com/sites/default/files/custom/Documents/ESQ/Trump\\_Maher.pdf](http://www.hollywoodreporter.com/sites/default/files/custom/Documents/ESQ/Trump_Maher.pdf).
- <sup>60</sup> *Id.*
- <sup>61</sup> *Id.*
- <sup>62</sup> *Id.*
- <sup>63</sup> *Id.* at Exhibit A.
- <sup>64</sup> *Id.*
- <sup>65</sup> Eriq Gardner, *Why Donald Trump is Likely to Lose a Lawsuit Against Bill Maher (Analysis)*, HOLLYWOOD REPORTER (Feb. 3, 2013), <http://hollywoodreporter.com/thr-esq-why-donald-trump-is-lose-417806>.
- <sup>66</sup> *Hustler*, 485 U.S. at 56-57.
- <sup>67</sup> *See* Cal. Civ. Code § 425.16(e)(4) (allowing defendant to bring anti-SLAPP motion to dismiss “a claim” arising from speech “in connection with a public issue or an issue of public interest”).

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<sup>68</sup> Eriq Gardner, *Donald Trump Withdraws Bill Maher Lawsuit*, HOLLYWOOD REPORTER (April 3, 2013), <http://hollywoodreporter.com/thr-esq-donald-trump-withdraws-bill-maher-432675>.

<sup>69</sup> *Trump Ruffin Commercial, LLC v. Local Joint Executive Board Las Vegas, Culinary Workers Union Local 226*, No. 15-cv-01984, ECF No. 1 (D. Nev. ).

<sup>70</sup> *Trump Ruffin Commercial, LLC v. Local Joint Executive Board Las Vegas, Culinary Workers Union Local 226*, No. 15-cv-01984, 2016 WL 4208437 (D. Nev. Aug. 8, 2016).

<sup>71</sup> *Trump Ruffin Commercial, LLC v. Local Joint Executive Board Las Vegas, Culinary Workers Union Local 226*, No. 15-cv-01984, ECF No. 21. (D. Nev. Aug. 17, 2016).

<sup>72</sup> *Miss Universe L.P., LLLP v. Univision Networks & Studios, Inc.*, No. 15-cv-05377, ECF No. 22 (S.D.N.Y. Nov. 6, 2015).

<sup>73</sup> *Id.*

<sup>74</sup> *Id.* (emphasis added).

<sup>75</sup> *Miss Universe L.P., LLLP v. Univision Networks & Studios, Inc.*, No. 15-cv-05377, ECF No. 25 (S.D.N.Y. Dec. 4, 2015).

<sup>76</sup> Nick Niedzwiadek, *Donald Trump, Univision Settle Lawsuit over Miss Universe Pageant*, WALL STREET JOURNAL (Feb. 11, 2016), <http://www.wsj.com/articles/donald-trump-univision-settle-lawsuit-over-miss-universe-pagaent-1455220440>; see also joint statement, <http://corporate.univision.com/2016/02/donald-j-trump-and-univision-reach-settlement/>

<sup>77</sup> Trump declared the following at his Feb. 26, 2016 campaign rally in Fort Worth, Texas: “I’m going to open up our libel laws so when they write purposely negative and horrible and false articles, we can sue them and win lots of money. We’re going to open up those libel laws. So when the *New York Times* writes a hit piece which is a total disgrace or when the *Washington Post*, which is there for other reasons, writes a hit piece, we can sue them and win money instead of having no chance of winning because they’re totally protected.” Hadas Gold, *Donald Trump: We’re going to ‘open up’ libel laws*, POLITICO (Feb. 26, 2016), <http://www.politico.com/blogs/on-media/2016/02/donald-trump-libel-laws-219866>

<sup>78</sup> *New York Times Co. v. Sullivan*, 376 U.S. 254, 279-80 (1964) (public official must prove actual malice to win libel case); *Gertz v. Robert Welch, Inc.*, 418 U.S. 323, 342, 346 (1974) (same for public figure).

<sup>79</sup> *E.g.*, Cal. Civ. Code § 425.16.

<sup>80</sup> State-by-state guide, Reporters Committee for Freedom of the Press, <https://www.rcfp.org/slapp-stick-fighting-frivolous-lawsuits-against-journalists/state-state-guide>

<sup>81</sup> *Makaeff III*, relying on Cal. Civ. Proc. Code § 425.16(c)(1) (“a prevailing defendant on a special motion to strike *shall* be entitled to recover his or her attorney’s fees and costs”) (emphasis added).



FOR IMMEDIATE RELEASE

CONTACT: Eric Schmeltzer, [eric@votevets.org](mailto:eric@votevets.org)

August 1, 2016

**VoteVets releases Gold Star Family Members letter to Trump, demand apology for all Gold Star Families**

***“Ours is a sacrifice you will never know. Ours is a sacrifice we would never want you to know.”***

WASHINGTON, DC – Family members of seventeen fallen service-members are writing to Donald J. Trump today, expressing their dismay at his treatment of the family of CPT. Humayun Khan, and demanding an apology. The letter was organized by Karen Meredith, a Gold Star mother who serves as Military Families Coordinator for [VoteVets.org](http://VoteVets.org).

The letter is below:

August 1, 2016

Donald J Trump

725 Fifth Avenue

New York, NY 10022

Mr. Trump,

We are all Gold Star Families, who have lost those we love the most in war. Ours is a sacrifice you will never know. Ours is a sacrifice we would never want you to know.

Your recent comments regarding the Khan family were repugnant, and personally offensive to us. When you question a mother's pain, by implying that her religion, not her grief, kept her from addressing an arena of people, you are attacking us. When you say your job building buildings is akin to our sacrifice, you are attacking our sacrifice.

You are not just attacking us, you are cheapening the sacrifice made by those we lost.

You are minimizing the risk our service members make for all of us.

This goes beyond politics. It is about a sense of decency. That kind decency you mock as "political correctness."

We feel we must speak out and demand you apologize to the Khans, to all Gold Star families, and to all Americans for your offensive, and frankly anti-American, comments.

We hope you will hear us.

Sincerely,

Diane and Neil Santoriello, Mother and Father of 1LT Neil Santoriello, KIA, Iraq

Summer Lipford-Mickelson, Mother, Frederick Sirko, Father, Kirby Mickelson, Stepfather, Laura Sirko Samimy and Bridget Sirko Gentle, Sisters of PFC Steven Sirko, KIA, Iraq.

Sue and Randy Loudon, Mother and Father of 2ndLt. Christopher Loudon, KIA, Iraq

Melanie House, Widow of HM3 John Daniel House, KIA, Iraq

Derek and Lorene Davey, Mother and Father of Cpl. Seamus M. Davey, KIA, Iraq

Celeste Zappala, Mother, and Raphael Zappala, Brother of SGT. Sherwood Baker, KIA, Iraq

Sue Niederer, Mother of 2LT Seth Dvorin, KIA, Iraq

Fulvio and Gilda Carbonaro, Father and Mother of Sgt. Alessandro Carbonaro, KIA, Iraq

Karen Meredith, Mother of 1LT Ken Ballard, KIA, Iraq

Sergio Torres, Father, Lupe Torres, Mother and Beatriz Saldivar, Aunt of SGT Daniel Torres, KIA, Iraq

MG (Ret.) Paul D. Eaton, and Frank Eaton, sons of Col. Norman Eaton, KIA, Vietnam

Stephanie Fisher, mother of SSG Thomas Fogarty, KIA Afghanistan

Norma and Oscar Aviles, parents of Lcpl. Andrew J. Aviles, KIA Iraq

Cheryl Lankford, widow of CSM Jonathan "Miles" Lankford Sr., KIA Iraq

Carlos and Melida Arredondo Father & Step-Mother to Lcpl. Alexander Arredondo, KIA, Iraq

Florence Sandra Penn , sister of 1 LT Charles Penn Jr , KIA Korea

Nadia McCaffrey, mother of SGT Patrick McCaffrey, KIA Iraq

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