

IN THE SUPERIOR COURT OF THE DISTRICT OF COLUMBIA
Civil Division

DISTRICT OF COLUMBIA, Plaintiff, v. TRUMP ORGANIZATION LLC, et al., Defendants.	Civil Action No.: 2020 CA 000488 B Judge José M. López Next Event: Initial Scheduling Conference Date: August 10, 2020 at 9:30 a.m.
---	--

**DISTRICT OF COLUMBIA’S OPPOSITION TO
DEFENDANT TRUMP ORGANIZATION LLC’S MOTION TO DISMISS**

INTRODUCTION

The District of Columbia (“District”) brings this action to remedy the unlawful payment of non-profit funds by the 58th Presidential Inaugural Committee (“PIC”) for event space at the Trump Old Post Office LLC (“Trump Hotel”). Defendant Trump Organization LLC (“Trump Organization”) has filed a motion to dismiss (the “Motion”), claiming that it does not have sufficient contacts with the District and could not have reasonably anticipated being haled into this court for a lawsuit relating to presidential inauguration events held in the District. The Motion builds a fortress of formalities, attempting to disentangle the Trump Organization from the Trump Hotel and the PIC by asserting the Trump Organization does not have corporate ownership or control over the Trump Hotel. This argument founders on the facts, which actually show that the Trump Organization, through its principals Donald J. Trump and Ivanka Trump, played a significant role in negotiating the unlawful deal challenged in the District’s Complaint. Indeed, Ivanka Trump was specifically warned by PIC staff against greenlighting the unfair pricing by the Trump Hotel, but ignored those warnings. Another Trump Organization executive participated in auditing the PIC’s finances after the fact. This conduct more than establishes minimum contacts with the District and the wrongdoing at issue such that the Trump Organization is subject to personal jurisdiction here.

BACKGROUND¹

There are three defendants in this action. The Trump Organization is a New York corporation that owns various business and property interests. (*Id.* ¶ 9.) The Trump Hotel operates and manages the Trump International Hotel located in Washington, D.C. (*Id.* ¶ 8.) The PIC is a non-profit organized to support activities surrounding the 2017 Presidential Inauguration of now-President Donald J. Trump. (*Id.* ¶¶ 7, 17.)

The District's Complaint alleges that the Trump Hotel, the Trump Organization, and the PIC violated District law by exploiting a non-profit (the PIC) to engage in self-dealing. (*Id.* ¶¶ 50-59.) The prime example cited in the Complaint is a contract entered into between the Trump Hotel and the PIC on January 10, 2017 (the "Trump Hotel Contract") to lease event space to host activities associated with President Trump's inauguration. (*Id.* ¶¶ 41-49.) The District alleges that the contract price was grossly above fair market value and therefore an "unfair, unreasonable and unjustified" sum that conferred "improper private benefit" on the Trump Hotel and the Trump Organization. (*Id.* ¶ 53.) The Trump Hotel Contract was performed in the District, as it covered the procurement of event space and food and beverage service for inaugural events hosted at the Trump Hotel in Washington, D.C. (*Id.* ¶¶ 41, 48.)

The District's Complaint alleges that the Trump Organization played a significant role in negotiating the Trump Hotel Contract through Ivanka Trump—who was then one of the highest-

¹ The Trump Organization's Motion only makes arguments regarding its request to dismiss for lack of personal jurisdiction pursuant to Rule 12(b)(2). This Opposition responds to these arguments. The Trump Organization has also incorporated in its Motion "as if they were fully stated herein" all arguments made by the Trump Hotel in a separately filed motion to dismiss pursuant to Rule 12(b)(6). (Mot. at 2.) The District has opposed the Trump Hotel's motion in a separately filed opposition brief (the "Trump Hotel Opposition"). Because the Trump Organization's Rule 12(b)(6) arguments are identical to that of the Trump Hotel's, the District likewise incorporates and relies on its arguments in the Trump Hotel Opposition to oppose the Trump Organization's incorporated argument.

ranking executives of the Trump Organization. (*See id.* ¶¶ 23-24.) Specifically, PIC executive Rick Gates emailed Ms. Trump on December 12, 2016, raising concerns that the Trump Hotel’s initial quote was “quite high compared to other property,” expressing that he was “worried about the optics of PIC paying Trump Hotel a high fee and the media making a big story out of it,” and concluding, “Let me know if you have any thoughts and if we can discuss the best path forward.” (*Id.* ¶ 23.) In response, Ms. Trump discussed the Trump Hotel’s pricing with Mickael Damelincourt, the Managing Director of the Trump Hotel, and arranged a meeting between Mr. Damelincourt and Mr. Gates. (*Id.* ¶ 24 (quoting Damelincourt email to Gates recounting he had “spoke[n] to Ivanka about our inauguration pricing” and scheduling meeting).) The terms discussed during this meeting would later be incorporated into the final agreement. (*Id.* ¶ 41.) Ms. Trump’s involvement negotiating the Trump Hotel Contract is further corroborated by her emails sent to and from her Trump Organization account, appended in Exhibit A. (*See* Exh. A, Decl. of N. Hill at TRUMPORG_001506-07, 001512-16, 006328-29.)²

The Complaint also alleges that Donald J. Trump—who remained the Chairman of the Trump Organization during the time the Trump Hotel Contract was being negotiated—was “aware of and involved in the negotiation.” (*Id.* ¶ 37.) This is corroborated by contemporaneous emails sent by PIC representatives memorializing conversations with Mr. Trump regarding the cost of Trump Hotel events related to the inauguration. (*See* Exh. A, DCAG-00009495-96, 00000106-10.) Finally, the Trump Organization continued to involve itself in the Trump Hotel Contract by participating in an audit of the PIC’s finances. (*See* Exh. A, TRUMPORG_002658-59, 005837.)

² Exhibit A attaches documents produced to the Office of the Attorney General pursuant to pre-suit investigative subpoenas; documents bearing the Bates stamp prefix “TRUMPORG” were produced by Defendant Trump Hotel and documents bearing the Bates stamp prefix “DCAG” were produced by Stephanie Winston Wolkoff, a PIC event planner. (*See* Exh. A ¶¶ 2-3.)

LEGAL STANDARD

At the pleading stage, the plaintiff need make “only a prima facie showing of jurisdiction.” *Companhia Brasileira Carbureto De Calcio v. Applied Indus. Materials Corp.*, 35 A.3d 1127, 1135 n.9 (D.C. 2012). The court has “considerable latitude in devising the procedures it will follow to ferret out the facts pertinent to jurisdiction,” and may rely on “written or oral evidence.” *Id.* at 1135. At the motion to dismiss stage, the court must “accept the allegations of the complaint as true” and “construe all facts and inferences in favor of the plaintiff.” *In re Estate of Curseen*, 890 A.2d 191, 193 (D.C. 2006).

ARGUMENT

A. The District can rely on the allegations in the Complaint and additional evidence to establish personal jurisdiction.

While the District has pleaded sufficient jurisdictional facts (discussed more below), it is well-settled that “a plaintiff has no obligation to establish personal jurisdiction until the defendant has raised that defense.” *AF Holdings, LLC v. Does 1-1058*, 752 F.3d 990, 994 (D.C. Cir. 2014) (emphasis added); *accord Caribbean Broad. Sys., Ltd. v. Cable & Wireless PLC*, 148 F.3d 1080, 1090 (D.C. Cir. 1998) (plaintiff’s “obligation to make some allegations relating to personal jurisdiction arose, therefore, only after [defendant] had filed its motion to dismiss and supporting affidavit”). “[T]he complaint should not need to allege . . . the basis for jurisdiction over the defendant’s person[.]” 5 Charles Alan Wright & Arthur R. Miller, *Fed. Practice and Procedure* § 1206 (3d ed. 2018). Indeed, although “[s]ome district court judges have construed Rule 8(a)(1)” (which requires a short and plain statement relating to subject-matter jurisdiction) “as requiring the complaint to state the grounds for personal jurisdiction,” that is “an erroneous interpretation that contravenes decades of jurisprudence.” *Id.*

The Trump Organization makes this same mistake, insisting repeatedly that dismissal is required because the Complaint does not allege facts that establish personal jurisdiction. (Mot. at 1, 4-5.) This argument is wrong on both the facts and the law. The Complaint does include adequate allegations, but, even if it did not, the District is entitled to come forward with facts that establish personal jurisdiction now that the Trump Organization has raised the defense. *E.g.*, *AF Holdings*, 752 F.3d at 994; *Caribbean Broad.*, 148 F.3d at 1090. And, far from being confined to the allegations in the Complaint, the Court has “considerable latitude in devising the procedures it will follow to ferret out the facts pertinent to jurisdiction” and may “rely upon either written or oral evidence.” *Applied Indus.*, 35 A.3d at 1135. As discussed below, the Complaint’s allegations and the evidence the District is submitting with this Opposition amply establish personal jurisdiction over the Trump Organization.

B. This Court has personal jurisdiction over the Trump Organization.

A court may assert personal jurisdiction over a nonresident defendant where (i) service of process is authorized by statute and (ii) constitutional due process requirements are satisfied. *Fisher v. Bander*, 519 A.2d 162, 163 (D.C. 1986) (citing *Int’l Shoe, Co. v. Washington*, 326 U.S. 310 (1945)). The District’s long-arm statute authorizes personal jurisdiction over nonresident defendants “transacting any business in the District of Columbia,” D.C. Code § 13-423(a)(1), which the Court of Appeals has held permits the exercise of personal jurisdiction to the extent “permitted by the due process clause.” *Shoppers Food Warehouse v. Moreno*, 746 A.2d 320, 330 (D.C. 2000). Accordingly, the statutory and constitutional inquiries are “coextensive” and can be resolved with a single “due process analysis.” *Fisher*, 519 A.2d at 163.

Due process requires that a defendant have sufficient “minimum contacts” with the District such that it could “reasonably anticipate being haled into court there.” *Shoppers*, 746 A.2d at 329 (quoting *World-Wide Volkswagen Corp v. Woodson*, 444 U.S. 286, 297 (1980)). Most critically,

this inquiry looks to whether the defendant's forum contacts were "purposeful[]" rather than merely "fortuitous or accidental." *Id.* This distinction recognizes a state's "manifest interest" in providing their "residents with a convenient forum for redressing injuries inflicted by out-of-state actors" and prevents constitutional due process from being "wielded as a territorial shield to avoid interstate obligations that have been voluntarily assumed." *Burger King Corp. v. Rudzewicz*, 471 U.S. 462, 473-74 (1985). Finally, in evaluating a corporation's forum contacts, because corporations "have no physical existence, courts often look to the activities of the corporate agents to determine whether sufficient contacts exist." *Chase v. Pan-Pacific Broad., Inc.*, 617 F. Supp. 1414, 1424 (D.D.C. 1985).

1. The Trump Organization's significant role in negotiating the Trump Hotel Contract establishes minimum contacts with the District.

The Court of Appeals has held that a nonresident's contracting with a District business for services performed in the District is "purposefully directed" activity sufficient to establish minimum contacts. *Fisher*, 519 A.2d at 165; *see also Mouzavires v. Baxter*, 434 A.2d 988, 997 (D.C. 1981) (per curiam) (jurisdiction proper where contract "had a substantial connection with the District and which [the defendant] foresaw would have consequences here"). In evaluating whether contractual activities establish minimum contacts, the Supreme Court has instructed lower courts to reject "mechanical tests" and instead apply a "highly realistic approach." *Burger King*, 471 U.S. at 478-79. This approach requires courts to look beyond contract formalities and examine multiple factors, such as "prior negotiations and contemplated future consequences, along with the terms of the contract and the parties' actual course of dealing." *Id.* Thus, a nonresident "may be subject to personal jurisdiction even if he has never been physically present in the forum state and where his only contacts have been by mail or telephone." *Schwartz v. CDI Japan, Ltd.*, 938 F. Supp. 1, 6 (D.D.C. 1996).

District of Columbia courts have accordingly found jurisdiction over nonresident defendants who played a role in negotiating contracts substantially connected with the District. In *Schwartz v. CDI Japan*, a Virginia plaintiff sued CDI (a Japanese corporation) and Harezo Shimizu (a corporate officer and Japanese national) for breach of a distributorship agreement entered into between the plaintiff and a third-party corporate officer. *Id.* at 3. That distributorship agreement related to supplying computer software to a Smithsonian museum pursuant to a separate contract between the Smithsonian museum and the third-party officer—which was later assigned to CDI. *Id.* While Mr. Shimizu was not involved with the original Smithsonian contract and had “never set foot in the District,” the court examined the parties’ entire “course of dealing” and ultimately found personal jurisdiction because Mr. Shimizu “negotiated the assignment of the Smithsonian contract and contemplated future consequences” from those negotiations. *Id.* at 5-6; *see also In re Baan Co. Sec. Litig.*, 245 F. Supp. 2d 117, 121, 135-36 (D.D.C. 2003) (where subsidiary’s fraudulent sales created sufficient forum contacts, personal jurisdiction also proper over parent company where evidence showed parent company “actually negotiated” the fraudulent sales).

The Trump Organization’s connections with the District exceed those in *CDI Japan*. Specifically, the Trump Organization purposefully directed its activities at the District by playing a significant role in negotiating the unfair Trump Hotel Contract. As an initial matter, there is no question that the Trump Hotel Contract was substantially connected with the District—the Trump Hotel is “located and registered to do business” in the District and the contract was performed entirely within the District because it leased event space at the Trump Hotel to host presidential inaugural events. (Compl. ¶¶ 8, 41.) Moreover, Trump Organization senior officers played a leading role negotiating the Trump Hotel Contract—and their actions are attributable to the corporation. *E.g., Mackey v. Compass Mkt., Inc.*, 391 Md. 117, 484 (Md. 2006) (“[T]he acts of

corporate agents may be attributed to a corporation for purposes of determining whether personal jurisdiction is proper over the principal.”); *see also In re Stat-Tech Sec. Litig.*, 905 F. Supp. 1416, 1422 (D. Colo. 1995) (“Because a corporation can act only through its agents, the rule is that the actions of corporate officers and directors are attributable to the corporate entity.”). By negotiating a contract so connected with the District, the Trump Organization thus established minimum contacts here.

One key Trump Organization officer who played a significant role negotiating the Trump Hotel Contract was Ivanka Trump, who at the time was a senior executive “generally seen as the second-most powerful person at the Trump Organization.”³ Ms. Trump’s email correspondence—conducted from her Trump Organization email account—illustrates the Trump Organization’s influence over the unfair terms of the Trump Hotel Contract. On December 12, 2016, PIC’s Deputy Chairman Rick Gates surfaced concerns to Ms. Trump about the “optics of PIC paying Trump Hotel a high fee and the media making a big story out of it.” (Compl. ¶ 23.) After receiving Mr. Gates’ email, Ms. Trump instructed Trump Hotel Managing Director Mickael Damelin court to engage in negotiations with the PIC. (*Id.* ¶ 24 (alleging Damelin court emailed Gates noting he had “spoke[n] to Ivanka about our inauguration pricing”.) Ms. Trump also directly replied to Mr. Gates, writing that she had “asked our GM Mickael [Damelin court] to call you directly,” to which Mr. Gates confirmed that he and Mr. Damelin court would “meet in the morning and sort out the issues.” (Exh. A, TRUMPORG_001506.) Ms. Trump’s involvement was ultimately instrumental to closing the deal—on December 17, Mr. Gates sent an email to PIC staffers, cc’ing Ms. Trump, writing, “Here is the revised pricing for the Trump Hotel following my conversation with Mickael

³ *Inside the Trump Org., the company that has run Trump’s big world*, N.Y. Times (Dec. 25, 2016), available at <https://www.nytimes.com/2016/12/25/us/politics/trump-organization-business.html>.

[Damelin court]. Much better rate. Ivanka – thank you for the help.” (Exh. A, TRUMPORG_006328 (emphasis added).) Yet, this revised pricing was still inflated; that same day, an event planner warned Ms. Trump by email that the agreed-upon daily rental fees were still more than double the “max rental fee [which] should be \$85,000 per day.” (Compl. ¶ 28.) This unfair rate was memorialized in the Trump Hotel Contract and is, of course, the subject of the District’s Complaint. (*Id.* ¶ 41.)

Additional evidence shows that the Trump Organization’s then-principal officer, Donald J. Trump, was also involved in the Trump Hotel Contract negotiations. Mr. Trump served as the Trump Organization’s Chairman while the Trump Hotel Contract was being negotiated in December 2016; he did not separate from the Trump Organization until January 2017.⁴ Mr. Trump played a significant role approving both the price and performance of the Trump Hotel Contract. For example, on December 16, 2016, emails to a PIC event planner included a task list that included the following entries: “Ask DJT about whether we will have Inaugural Celebration at Trump Hotel” and “Ask DJT about cost of ALL EVENTS at Trump Hotel (Leadership Lunch, Inaug. Celebration).” (Exh. A, DCAG-00009496 (capitalization in original).) The PIC event planner confirmed that she had spoken with both Donald Trump and Ivanka Trump in a follow-up email providing detailed “updates” regarding her “meeting with IT and DJT today.” (Exh. A, DCAG-00000106.)

Finally, District of Columbia courts have also held that other forms of financial management can create sufficient minimum contacts with this forum. For example, in *Kroger v. Legalbill.com, LLC*, the court exercised personal jurisdiction over an auditing firm without any

⁴ *Trump hands over business empire to sons*, BBC News (Jan. 12, 2017), available at <https://www.bbc.com/news/business-38587628>.

offices or clients in the District. 2005 WL 4908968, at *5 (D.D.C. Apr. 7, 2005). The court found personal jurisdiction because the firm had contracted with a non-resident client to audit invoices issued by the client’s D.C.-based law firm—which created “continuous contact” with the District. *Id.* Similarly here, the Trump Organization established additional contacts with the District by auditing the PIC’s finances, which would include disbursements made as part of the Trump Hotel Contract. The Trump Organization’s involvement in this audit is demonstrated by an April 19, 2017 email correspondence between Mr. Gates, a third-party accountant, and Allen Weisselberg, the Trump Organization’s Chief Financial Officer. (Exh. A, TRUMPORG_005837.) In the email, Mr. Gates asked the accountant to “reach out to Allen [Weisselberg] and walk him through the auditing process for PIC.” (*Id.*) Mr. Weisselberg then requested the accountant to “send me the latest report reflecting all revenue broken down by its sources as well as a detailed disbursement schedule by vendor.” (*Id.*) Mr. Weisselberg’s involvement in the audit was far from cursory, and he went on to engage in detailed correspondence with PIC representatives, requesting a “breakdown of each expense category by vendor” and inquiring about discrepancies in donation amounts between the PIC’s Federal Election Commission filings and revenue reports. (Exh. A, TRUMPORG_002658.)

Altogether, the close involvement of Trump Organization principals and senior executives with a contract substantially connected with the District establishes minimum contacts in this forum. Indeed, the Trump Organization’s claims that it does not own or control the Trump Hotel are corporate formalities entirely beside the point. (Mot. at 10.) Those technicalities are simply not enough to escape jurisdiction where Trump Organization executives participated in virtually every phase of the contracting process—from negotiation to approval to audit—regarding a contract substantially connected with the District.

2. This action relates to the Trump Organization’s role negotiating the Trump Hotel Contract.

The “minimum contacts” analysis also requires that the cause of action “relate to” the forum activities—which the Court of Appeals has interpreted flexibly to require only a “discernible relationship” between those activities and the cause of action. *Shoppers*, 746 A.2d at 335. This is “not a particularly high threshold”; a claim “only fails to have a ‘discernible relationship’ when it is unrelated to the acts forming the basis for personal jurisdiction.” *IMark Mkt. Servs., LLC v. Geoplast SPA*, 753 F. Supp. 2d 141, 157 (D.D.C. 2010) (emphasis added).

The District’s claims are plainly related to the Trump Organization’s forum activities—that is, its role in negotiating the Trump Hotel Contract. The District’s claims arise directly out of the Trump Hotel Contract, which the District cites as an example of how the PIC made “illegal and *ultra vires* payments” in violation of District law that caused the PIC to “exceed or abuse its lawful authority . . . and [] act contrary to its nonprofit purpose in the District of Columbia.” (Compl. ¶¶ 54-55.) Because the Trump Organization played a significant role negotiating that contract, its activities are integral to the District’s claims—and directly related to the District’s requested equitable relief, including a constructive trust over all entities who “control[led]” the stream of unlawful nonprofit funds or would be “unjustly enriched if allowed to retain the funds.” (*Id.* ¶¶ 58-59.)

C. In any event, the District is entitled to jurisdictional discovery.

For the reasons set out above, the District has made a *prima facie* showing of personal jurisdiction. However, if the Court finds these jurisdictional facts insufficient, it should allow jurisdictional discovery to confirm the Trump Organization’s involvement in the Trump Hotel Contract, which is permitted so long as the plaintiff has a “good faith belief that such discovery will enable it to show that the court has personal jurisdiction over the defendant.” *Daley v. AKA*

Sorority, Inc., 26 A.3d 723, 728 (D.C. 2011). This standard is “quite liberal.” *Diamond Chem. Co., Inc. v. Atofina Chems., Inc.*, 268 F. Supp. 2d 1, 15 (D.D.C. 2003) (“[T]his Court finds it hard to imagine a situation where a plaintiff could not demonstrate that it can supplement its jurisdictional allegations through discovery.”).

The District has met this good faith standard. As alleged in the Complaint and confirmed by the documents submitted with this Opposition, Trump Organization senior executives played a significant role negotiating the Trump Hotel Contract, which is at the heart of the District’s claims in this case. Those executives issued directives to Trump Hotel employees working in the District and liaised with PIC staffers to plan the inaugural events that took place in the District in connection with Trump Hotel Contract. This is more than sufficient to establish personal jurisdiction. Additionally, at a minimum, the District has articulated a good faith belief that warrants jurisdictional discovery into the Trump Organization’s contacts with the Trump Hotel, the PIC, and the District, including at least the depositions of the Trump Organization principals and executives discussed in this opposition.

CONCLUSION

The Trump Organization’s Motion to Dismiss should be denied.

Dated: May 15, 2020

Respectfully submitted,

KARL A. RACINE
Attorney General for the District of Columbia

KATHLEEN KONOPKA
Deputy Attorney General
Public Advocacy Division

/s/
JIMMY R. ROCK (#493521)
Assistant Deputy Attorney General
Public Advocacy Division

/s/

NICOLE HILL (#888324938)

MATT JAMES (#1632202)

LEONOR MIRANDA (#1044293)

RANDOLPH T. CHEN (#1032644)

Assistant Attorneys General

Office of the Attorney General

441 Fourth St., N.W., Suite 600-South

Washington, D.C. 20001

(202) 727-3400 (phone)

(202) 741-8873 (fax)

jimmy.rock@dc.gov

Attorneys for the District of Columbia

CERTIFICATE OF SERVICE

I hereby certify that on May 15, 2020, a copy of the foregoing Opposition to Defendant Trump Organization LLC's Motion to Dismiss was served on all counsel of record via CaseFileXpress.

/s _____
RANDOLPH T. CHEN
Attorney for the District of Columbia

EXHIBIT A

IN THE SUPERIOR COURT OF THE DISTRICT OF COLUMBIA
Civil Division

<p>DISTRICT OF COLUMBIA,</p> <p style="text-align:center">Plaintiff,</p> <p style="text-align:center">v.</p> <p>58TH PRESIDENTIAL INAUGURAL COMMITTEE et al.,</p> <p style="text-align:center">Defendants.</p>	<p>Civil Action No.: 2020 CA 000488 B</p>
--	---

ATTORNEY DECLARATION OF NICOLE HILL

I, Nicole Hill, declare as follows:

1. I am an Assistant Attorney General in the Office of the Attorney General for the District of Columbia and represent the District of Columbia in the above-captioned matter.
2. In response to a subpoena from the Office of the Attorney General dated March 1, 2019 to the Trump Hotel,¹ the Trump Hotel produced documents Bates stamped TRUMPORG_001506-07, TRUMPORG_001512-16, TRUMPORG_002658-59, TRUMPORG_005837, TRUMPORG_006328-29. True and correct copies of these documents are appended to this Declaration.
3. Documents Bates stamped DCAG-00009495, DCAG-00009496, and DCAG00000106-10 were produced in response to a subpoena from the Office of the Attorney General dated July 10, 2019 to Stephanie Winston Wolkoff. True and correct copies of these documents are appended to this Declaration.

¹ The subpoena issued March 1, 2019 was addressed to the Trump Organization. However, for purposes of document production, the District and counsel for Defendant Trump Hotel agreed to treat the subpoena issued to the Trump Organization as though it had been served on the Trump Hotel.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: May 14, 2020

/s/_____

Nicole Hill

From: Rick Gates [rgates@58PIC2017.org]
Sent: Wednesday, December 14, 2016 9:32 PM
To: Ivanka Trump
Cc: Mickael Damelin court(Google App)
Subject: Re: Buyout minimum

Ivanka-
Thanks very much. Mickael and I are going to meet in the morning and sort out the issues.

On Dec 14, 2016, at 22:02, Ivanka Trump <itrump@trumporg.com<<mailto:itrump@trumporg.com>>> wrote:

Hi Rick,
I asked our GM Mickael to call you directly. Thanks!

From: Rick Gates [mailto:rgates@58PIC2017.org]
Sent: Monday, December 12, 2016 8:21 PM
To: Ivanka Trump <itrump@trumporg.com<<mailto:itrump@trumporg.com>>>
Subject: Fwd: Buyout minimum

Ivanka-
Hope you are well. I wanted to pass along the below information in hopes that you can provide some help. Stephanie's plans for several of our inaugural events incorporates the use of the OPO ballroom. However, we both have two concerns with the email below. First, the cost itself seems quite high compared to other property buyouts for the week. Second, I am a bit worried about the optics of PIC paying Trump Hotel a high fee and the media making a big story out of it. Let me know if you have any thoughts and if we can discuss the best path forward. Thanks very much.

Regards,
Rick

Begin forwarded message:

From: Ramsey Ratcliffe
Sent: Saturday, December 10, 2016 2:39 PM
To: Jonathan Reed; Lindsay Reynolds
Subject: Fwd: Buyout minimum

Ummm.....

Sent from my iPhone

Begin forwarded message:
From: Patricia Tang <ptang@trumphotels.com<<mailto:ptang@trumphotels.com>>>
Date: December 10, 2016 at 2:37:13 PM EST
To: Ramsey Ratcliffe - Finance <rratcliffe@gop.com<<mailto:rratcliffe@gop.com>>>
Subject: Buyout minimum
Ramsey,

For eight days, Sunday through Sunday, for all space including room rental and minimum F&B, the price is \$3,600,000.

Thank you and please let me know if you have further questions.

Patty

PATRICIA TANG
Director, Sales & Marketing

NOW OPEN

TRUMP INTERNATIONAL HOTEL WASHINGTON D.C.
Old Post Office Building
1100 Pennsylvania Avenue, N.W. Washington D.C. 20004
T: | Office: 202-868-5010 Mobile: 202.320.8711 Hotel: 202-695-1100
F: 202-868-5194

EXPLORE OUR DESTINATIONS<[https://urldefense.proofpoint.com/v2/url?u=http-3A_www.trumphotelcollection.com_&d=CwMGaQ&c=0Z6kaK2gE4DV23xJiV3durr6BPoNXbPx1co_fqsb6wM&r=9RUBCGJ-wk9anTSqgwuyUegaxTt4ZuAXVVgzQBUW9RU&m=z2pe5J-ah7KiGvavWUFYwWfVzHm6MIhhqVU9JonOjLM&s=Vbhn5IDvHV0E6-HbE_XLf8Ht40E2wEA06UlHuiHAV84&e=>](https://urldefense.proofpoint.com/v2/url?u=http-3A_www.trumphotelcollection.com_&d=CwMGaQ&c=0Z6kaK2gE4DV23xJiV3durr6BPoNXbPx1co_fqsb6wM&r=9RUBCGJ-wk9anTSqgwuyUegaxTt4ZuAXVVgzQBUW9RU&m=z2pe5J-ah7KiGvavWUFYwWfVzHm6MIhhqVU9JonOjLM&s=Vbhn5IDvHV0E6-HbE_XLf8Ht40E2wEA06UlHuiHAV84&e=)

[<https://sites.google.com/a/trumphotels.com/trump-soho-public-photo/twitter/twitter%20small.png?attredirects=0>]<[https://urldefense.proofpoint.com/v2/url?u=https-3A_twitter.com_TrumpDC&d=CwMGaQ&c=0Z6kaK2gE4DV23xJiV3durr6BPoNXbPx1co_fqsb6wM&r=9RUBCGJ-wk9anTSqgwuyUegaxTt4ZuAXVVgzQBUW9RU&m=z2pe5J-ah7KiGvavWUFYwWfVzHm6MIhhqVU9JonOjLM&s=M_eohfxAPIk9zvK_PLJnIrIVHF8HGe1H9NSy1J2Alq4&e=>](https://urldefense.proofpoint.com/v2/url?u=https-3A_twitter.com_TrumpDC&d=CwMGaQ&c=0Z6kaK2gE4DV23xJiV3durr6BPoNXbPx1co_fqsb6wM&r=9RUBCGJ-wk9anTSqgwuyUegaxTt4ZuAXVVgzQBUW9RU&m=z2pe5J-ah7KiGvavWUFYwWfVzHm6MIhhqVU9JonOjLM&s=M_eohfxAPIk9zvK_PLJnIrIVHF8HGe1H9NSy1J2Alq4&e=)

[<https://sites.google.com/a/trumphotels.com/trump-soho-public-photo/facebook/facebook%20small.png?attredirects=0>]
<[https://urldefense.proofpoint.com/v2/url?u=https-3A_www.facebook.com_trumpwashingtondc_&d=CwMGaQ&c=0Z6kaK2gE4DV23xJiV3durr6BPoNXbPx1co_fqsb6wM&r=9RUBCGJ-wk9anTSqgwuyUegaxTt4ZuAXVVgzQBUW9RU&m=z2pe5J-ah7KiGvavWUFYwWfVzHm6MIhhqVU9JonOjLM&s=Yb1hwpwJ0AFpZCgLC15XF5pn3HBSjw4naVX9jae0MBg&e=>](https://urldefense.proofpoint.com/v2/url?u=https-3A_www.facebook.com_trumpwashingtondc_&d=CwMGaQ&c=0Z6kaK2gE4DV23xJiV3durr6BPoNXbPx1co_fqsb6wM&r=9RUBCGJ-wk9anTSqgwuyUegaxTt4ZuAXVVgzQBUW9RU&m=z2pe5J-ah7KiGvavWUFYwWfVzHm6MIhhqVU9JonOjLM&s=Yb1hwpwJ0AFpZCgLC15XF5pn3HBSjw4naVX9jae0MBg&e=)

[<https://sites.google.com/a/trumphotels.com/trump-soho-public-photo/instag/instagram%20%281%29.png?attredirects=0>]
<[https://urldefense.proofpoint.com/v2/url?u=https-3A_www.instagram.com_trumpwashingtondc_&d=CwMGaQ&c=0Z6kaK2gE4DV23xJiV3durr6BPoNXbPx1co_fqsb6wM&r=9RUBCGJ-wk9anTSqgwuyUegaxTt4ZuAXVVgzQBUW9RU&m=z2pe5J-ah7KiGvavWUFYwWfVzHm6MIhhqVU9JonOjLM&s=k_OpBmZHeLhVXCrOHIOXbaEvgFoZEesSxzA0U7wbuzM&e=>](https://urldefense.proofpoint.com/v2/url?u=https-3A_www.instagram.com_trumpwashingtondc_&d=CwMGaQ&c=0Z6kaK2gE4DV23xJiV3durr6BPoNXbPx1co_fqsb6wM&r=9RUBCGJ-wk9anTSqgwuyUegaxTt4ZuAXVVgzQBUW9RU&m=z2pe5J-ah7KiGvavWUFYwWfVzHm6MIhhqVU9JonOjLM&s=k_OpBmZHeLhVXCrOHIOXbaEvgFoZEesSxzA0U7wbuzM&e=)

[https://sites.google.com/a/trumphotels.com/th-stock-photos/home/washington-dc/TIHWashington_EmailFooter.gif?attredirects=0]

Forbes Travel Guide Most Anticipated Hotel Openings Of 2016

From: Mickael Damelin court [mdamelincourt@trumphotels.com]
Sent: Wednesday, December 14, 2016 4:17 PM
To: Ivanka Trump
Cc: Eric Danziger
Subject: RE: Buyout minimum

Will do...

MICKAEL C. DAMELIN COURT

Managing Director

NOW OPEN

TRUMP INTERNATIONAL HOTEL WASHINGTON D.C. Old Post Office Building

1100 Pennsylvania Avenue, N.W. Washington D.C. 20004

T: 202.868.5001 F: 202.865.5195

EXPLORE OUR DESTINATIONS <<http://www.trumphotelcollection.com/>>

FORBES TRAVEL GUIDE MOST ANTICIPATED HOTEL OPENINGS OF 2016

<<http://www.forbes.com/sites/forbestravelguide/2016/01/28/20-most-anticipated-hotel-openings-of-2016/#6403bd3068da>>

[image:

<https://sites.google.com/a/trumphotels.com/trump-soho-public-photo/twitter/twitter%20small.png?attredirects=0>]

<<https://twitter.com/TrumpDC>> [image:

<https://sites.google.com/a/trumphotels.com/trump-soho-public-photo/facebook/facebook%20small.png?attredirects=0>]

<<https://www.facebook.com/trumpwashingtondc/>> [image:

<https://sites.google.com/a/trumphotels.com/trump-soho-public-photo/instag/instagram%20%281%29.png?attredirects=0>]

<<https://www.instagram.com/trumpwashingtondc/>>

From: Ivanka Trump [mailto:itrump@trumporg.com]

Sent: Wednesday, December 14, 2016 4:57 PM
To: Mickael Damelin-court(Google App)
Cc: Eric Danziger(Google App)
Subject: RE: Buyout minimum

Just seeing this. why don't you call and negotiate.

It should be a fair market rate.

From: mdamelincourt@trumphotels.com [mailto:mdamelincourt@trumphotels.com
<mdamelincourt@trumphotels.com>]
Sent: Tuesday, December 13, 2016 12:13 AM
To: Ivanka Trump <itrump@trumporg.com>
Cc: Eric Danziger(Google App) <edanziger@trumphotels.com>
Subject: Re: Buyout minimum

This is the F&B and room rental minimum for each room during that period as per our sales guidelines. The chance to get this from anyone is second to none. In all situations, we would have to negotiate. I would be fine with anyone offering us 50% of the \$3.6m quoted by the team; \$1.8m

Mickael

MICKAEL C. DAMELINCOURT

Managing Director

NOW OPEN

*TRUMP INTERNATIONAL HOTEL WASHINGTON D.C. * Old Post Office Building

1100 Pennsylvania Avenue, N.W. Washington D.C. 20004 <x-apple-data-detectors://1/0>

T: 202.868.5001 F: 202.865.5195

EXPLORE OUR DESTINATIONS

<[2](https://urldefense.proofpoint.com/v2/url?u=http-3A__www.trumphotelcollection.com_d=CwMFaQ&c=0Z6kaK2gE4DV23xJiV3durr6BPoNXbPx1co_fqsb6wM&r=9RUBCGJ-wk9anTSqgwuyUegaxTt4ZuAXVvgzQBUW9RU&m=ITabEbVB0bDUU1T0suQ3wpzRohKHxpzApaDcaF3BoL8&s=2jaQTm2PWm1z1ErU0pBFf1qYP7ZBu1NUzs19ssfc4HQ&e=>></p></div><div data-bbox=)

FORBES TRAVEL GUIDE MOST ANTICIPATED HOTEL OPENINGS OF 2016

<[\[image:](https://urldefense.proofpoint.com/v2/url?u=http-3A__www.forbes.com_sites_forbestravelguide_2016_01_28_20-2Dmost-2Danticipated-2Dhotel-2Dopenings-2Dof-2D2016_-236403bd3068da&d=CwMFaQ&c=0Z6kaK2gE4DV23xJiV3durr6BPoNXbPx1co_fqsb6wM&r=9RUBCGJ-wk9anTSqgwuyUegaxTt4ZuAXVVgzQBUW9RU&m=ITabEbVBObDUU1T0suQ3wpzRohKHxpzApaDcaF3BoL8&s=me1szH53M6SM4kiXhuXwXP-b2Eo8mJK6hAI0dJkPPyY&e=></p></div><div data-bbox=)

<https://sites.google.com/a/trumphotels.com/trump-soho-public-photo/twitter/twitter%20small.png?attredirects=0>]

<[\[image:](https://urldefense.proofpoint.com/v2/url?u=https-3A__twitter.com_TrumpDC&d=CwMFaQ&c=0Z6kaK2gE4DV23xJiV3durr6BPoNXbPx1co_fqsb6wM&r=9RUBCGJ-wk9anTSqgwuyUegaxTt4ZuAXVVgzQBUW9RU&m=ITabEbVBObDUU1T0suQ3wpzRohKHxpzApaDcaF3BoL8&s=XVTRH0w_0q6Kgd1m4hiDpg8mGIBjExIB38a9oF8FNzc&e=></p></div><div data-bbox=)

<https://sites.google.com/a/trumphotels.com/trump-soho-public-photo/facebook/facebook%20small.png?attredirects=0>]

<[\[image:](https://urldefense.proofpoint.com/v2/url?u=https-3A__www.facebook.com_trumpwashingtondc_&d=CwMFaQ&c=0Z6kaK2gE4DV23xJiV3durr6BPoNXbPx1co_fqsb6wM&r=9RUBCGJ-wk9anTSqgwuyUegaxTt4ZuAXVVgzQBUW9RU&m=ITabEbVBObDUU1T0suQ3wpzRohKHxpzApaDcaF3BoL8&s=ZHfahkzS5lvIB_UA_rQVIZOjYvgthz4NeSA1BMjrYUE&e=></p></div><div data-bbox=)

<https://sites.google.com/a/trumphotels.com/trump-soho-public-photo/instag/instagram%20%281%29.png?attredirects=0>]

<[On Dec 12, 2016, at 10:13 PM, Ivanka Trump <\[itrump@trumporg.com\]\(mailto:itrump@trumporg.com\)> wrote:](https://urldefense.proofpoint.com/v2/url?u=https-3A__www.instagram.com_trumpwashingtondc_&d=CwMFaQ&c=0Z6kaK2gE4DV23xJiV3durr6BPoNXbPx1co_fqsb6wM&r=9RUBCGJ-wk9anTSqgwuyUegaxTt4ZuAXVVgzQBUW9RU&m=ITabEbVBObDUU1T0suQ3wpzRohKHxpzApaDcaF3BoL8&s=uf0iAhtV8IhqTOIo_IGA8-jMlnAIbWr9zhVDEB0BJKU&e=></p></div><div data-bbox=)

Can you confirm that this is a fair market price. Seems high but if in line with market I will tell them

From: Rick Gates [<mailto:rgates@58PIC2017.org> <rgates@58PIC2017.org>]
Sent: Monday, December 12, 2016 8:21 PM
To: Ivanka Trump <itrump@trumporg.com>
Subject: Fwd: Buyout minimum

Ivanka-

Hope you are well. I wanted to pass along the below information in hopes that you can provide some help. Stephanie's plans for several of our inaugural events incorporates the use of the

OPO ballroom. However, we both have two concerns with the email below. First, the cost itself seems quite high compared to other property buyouts for the week. Second, I am a bit worried about the optics of PIC paying Trump Hotel a high fee and the media making a big story out of it. Let me know if you have any thoughts and if we can discuss the best path forward. Thanks very much.

Regards,

Rick

Begin forwarded message:

From: Ramsey Ratcliffe
Sent: Saturday, December 10, 2016 2:39 PM
To: Jonathan Reed; Lindsay Reynolds
Subject: Fwd: Buyout minimum

Ummm.....

Sent from my iPhone

Begin forwarded message:

From: Patricia Tang <ptang@trumphotels.com>
Date: December 10, 2016 at 2:37:13 PM EST
To: Ramsey Ratcliffe - Finance <rratcliffe@gop.com>
Subject: *Buyout minimum*

Ramsey,

For eight days, Sunday through Sunday, for all space including room rental and minimum F&B, the price is \$3,600,000.

Thank you and please let me know if you have further questions.

Patty

PATRICIA TANG

Director, Sales & Marketing

* NOW OPEN*

TRUMP INTERNATIONAL HOTEL WASHINGTON D.C. Old Post Office Building

1100 Pennsylvania Avenue, N.W. Washington D.C. 20004

T: | Office: 202-868-5010 Mobile: 202.320.8711 Hotel: 202-695-1100

F: 202-868-5194

EXPLORE OUR DESTINATIONS

<[<\[<\\[<\\\[*Forbes Travel Guide Most Anticipated Hotel Openings Of 2016*\\\]\\\(https://urldefense.proofpoint.com/v2/url?u=https-3A__www.instagram.com_trumpwashingtondc_&d=CwMGaQ&c=0Z6kaK2gE4DV23xJiV3durr6BPoNXbPx1co_fqsb6wM&r=9RUBCGJ-wk9anTSqgwuyUegaxTt4ZuAXVVgzQBUW9RU&m=z2pe5J-ah7KiGvavWUFYwWfVzhm6MIhhqVU9JonOjLM&s=k_OpBmZHeLhVXCrOHIOXbaEvgFoZEesSxzA0U7wbuzM&e=></p></div><div data-bbox=\\\)\\]\\(https://urldefense.proofpoint.com/v2/url?u=https-3A__www.facebook.com_trumpwashingtondc_&d=CwMGaQ&c=0Z6kaK2gE4DV23xJiV3durr6BPoNXbPx1co_fqsb6wM&r=9RUBCGJ-wk9anTSqgwuyUegaxTt4ZuAXVVgzQBUW9RU&m=z2pe5J-ah7KiGvavWUFYwWfVzhm6MIhhqVU9JonOjLM&s=Yb1hwpwJ0AFpZCgLc15XF5pn3HBSjw4naVX9jae0MBg&e=></p></div><div data-bbox=\\)\]\(https://urldefense.proofpoint.com/v2/url?u=https-3A__twitter.com_TrumpDC&d=CwMGaQ&c=0Z6kaK2gE4DV23xJiV3durr6BPoNXbPx1co_fqsb6wM&r=9RUBCGJ-wk9anTSqgwuyUegaxTt4ZuAXVVgzQBUW9RU&m=z2pe5J-ah7KiGvavWUFYwWfVzhm6MIhhqVU9JonOjLM&s=M_eohfxAPIk9zvK_PLJnIrIVHF8HGe1H9NSy1J2Alq4&e=></p></div><div data-bbox=\)](https://urldefense.proofpoint.com/v2/url?u=http-3A__www.trumphotelcollection.com_&d=CwMGaQ&c=0Z6kaK2gE4DV23xJiV3durr6BPoNXbPx1co_fqsb6wM&r=9RUBCGJ-wk9anTSqgwuyUegaxTt4ZuAXVVgzQBUW9RU&m=z2pe5J-ah7KiGvavWUFYwWfVzhm6MIhhqVU9JonOjLM&s=Vbhn5IDvHV0E6-HbE_XLf8Ht40E2wEA06UlHuiHAV84&e=></p></div><div data-bbox=)

From: Heather Martin [HMartin@58PIC2017.org]
Sent: Monday, May 08, 2017 10:15 AM
To: Allen Weisselberg
Subject: RE: follow-up questions
Attachments: FEC Report Final Data 3-28-2017.xlsx; PIC Budget 2017--Main.pdf

Hi Allen- the total on the attached is 105,133,630 (current as of today), not 105133603 (which you have listed below) so the actual difference is 1,581,678.29. Since the FEC report was filed we received an additional 1k in donations from Farmer Brothers Coffee for which an amendment will be submitted to the FEC. The full detail of the entire FEC report raw data is attached which includes the in-kind contributions beginning on line 660.

From: Allen Weisselberg [mailto:weisselberg@trumporg.com]
Sent: Monday, May 8, 2017 10:51 AM
To: Heather Martin <HMartin@58PIC2017.org>
Subject: RE: follow-up questions

Thank you for the attached information. Can you provide a printout by vendor that ties into each expense line. Additionally, after reviewing the FEC filing dated 4/18/17 the net donations on line 7 of \$106,715,308.29 and the PIC revenue on your report of \$105,133,603.00 differ by \$1,581,706.29 what caused this difference ? Thanks.

From: Heather Martin [mailto:HMartin@58PIC2017.org]
Sent: Friday, May 05, 2017 6:22 PM
To: Allen Weisselberg <weisselberg@trumporg.com>
Subject: RE: follow-up questions

Hi Allen- attached is the detail that makes up the cover page (not super pretty as this is my daily working document) but I believe this might give you a clearer picture of the data you want? I believe Doug sent you the quick books data but this is the detail behind the major spend categories and the vendors. The revenue on this is current as of today. I reconcile a few times a week if not daily. If there is a format you'd like to see the data in please send it along and I will build it. Please call me with any questions at 202-867-5423.

Heather Martin

From: Allen Weisselberg [mailto:weisselberg@trumporg.com]
Sent: Friday, May 5, 2017 4:51 PM
To: Heather Martin <HMartin@58PIC2017.org>
Subject: follow-up questions

Thank you for the attached. What is the actual date of the PIC Revenue report? Additionally, do you have the breakdown of each expense category by vendor (i.e. under Communications what vendors make up the \$1,822,671.61 ?). once I receive the requested information I will probably have additional questions. Thank you.

This communication is from The Trump Organization or an affiliate thereof and is not sent on behalf of any other individual or entity. This email may contain information that is confidential and/or proprietary. Such information may not be read, disclosed, used, copied, distributed or disseminated except (1) for use by the intended recipient or (2) as expressly authorized by the sender. If you have received this communication in error, please immediately delete it and promptly notify the sender. E-mail transmission cannot be guaranteed to be received, secure or error-free as emails could be intercepted, corrupted, lost, destroyed, arrive late,

incomplete, contain viruses or otherwise. The Trump Organization and its affiliates do not guarantee that all emails will be read and do not accept liability for any errors or omissions in emails. Any views or opinions presented in any email are solely those of the author and do not necessarily represent those of The Trump Organization or any of its affiliates. Nothing in this communication is intended to operate as an electronic signature under applicable law.

This communication is from The Trump Organization or an affiliate thereof and is not sent on behalf of any other individual or entity. This email may contain information that is confidential and/or proprietary. Such information may not be read, disclosed, used, copied, distributed or disseminated except (1) for use by the intended recipient or (2) as expressly authorized by the sender. If you have received this communication in error, please immediately delete it and promptly notify the sender. E-mail transmission cannot be guaranteed to be received, secure or error-free as emails could be intercepted, corrupted, lost, destroyed, arrive late, incomplete, contain viruses or otherwise. The Trump Organization and its affiliates do not guarantee that all emails will be read and do not accept liability for any errors or omissions in emails. Any views or opinions presented in any email are solely those of the author and do not necessarily represent those of The Trump Organization or any of its affiliates. Nothing in this communication is intended to operate as an electronic signature under applicable law.

Allen Weisselberg

From: Allen Weisselberg
Sent: Wednesday, April 19, 2017 1:59 PM
To: 'Rick Gates'; Douglas Ammerman
Cc: tombarrackpersonal@gmail.com
Subject: RE: PIC Info

Doug if you would be so kind as to send me the latest report reflecting all revenue broken down by its sources as well as a detailed disbursement schedule by vendor it would be greatly appreciated. Once I review these reports I will get back to you with additional questions or requests. Thank you very much.

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

From: Rick Gates [mailto:rgates6@me.com]
Sent: Wednesday, April 19, 2017 1:26 PM
To: Douglas Ammerman <douglasammerman@gmail.com>
Cc: Allen Weisselberg <weisselberg@trumporg.com>; tombarrackpersonal@gmail.com
Subject: PIC Info

Doug-
I would like to introduce you to Allen Weisselberg who is with the Trump Organization and was an enormous help to us on the campaign. Please reach out to Allen and walk him through the the auditing process for PIC and the activities that were conducted throughout the the project. Thanks very much.

Regards,
Rick

4/19/17

- Spoke to Rick Gates today about the Organization accounts. He is going to send an email to RED Curve + JRT to send me full reports showing all money received & spent.
- Current balance is about \$8 million with all payroll of about \$800,000.
- Rick Gates # 917-209-7176

From: Rick Gates
Sent: Saturday, December 17, 2016 3:19 PM
To: Stephanie Winston Wolkoff; Sara Armstrong; jon@tinyhorse.com
Cc: Ivanka Trump
Subject: Fwd: Trump DC events...

Stephanie-

Here is the revised pricing for the Trump Hotel following my conversation with Mickael. Much better rate.

Ivanka - thank you for your help.

Regards,
Rick

Begin forwarded message:

From: Mickael Damelin court <mdamelincourt@trumphotels.com>
Date: December 16, 2016 at 23:29:52 EST
To: Rick Gates <rgates@58pic2017.org>
Subject: Trump DC events...

Rick...As a follow up to our conversation earlier today, I would be comfortable with the following...

- Entire Presidential Ballroom Space (11 meeting rooms) reserved on Tue/Wed/Thu/Fri for \$700K (\$175K / day)
- No Food & Beverage minimum. However the following events are scheduled and Food & Beverage pricing as per catering menu will apply...
 - . Seated Lunch on Thursday for approximately 500ppl
 - . Reception on Friday (9pm - Midnight) for approximately 1,250ppl
- BTL Restaurant and Benjamin Bar remain open to public
- Franklin Study, Lincoln Library, Grant and Patton Meeting rooms (basement) remain open to public

Let me know your thoughts...

Best Regards,

Mickael

MICKAEL C. DAMELINCOURT
Managing Director

NOW OPEN

TRUMP INTERNATIONAL HOTEL WASHINGTON D.C.
Old Post Office Building

1100 Pennsylvania Avenue, N.W. Washington D.C. 20004
T: 202.868.5001 F: 202.865.5195

EXPLORE OUR DESTINATIONS

FORBES TRAVEL GUIDE MOST ANTICIPATED HOTEL OPENINGS OF 2016

Message

From: Devon R. Weiss [weissdr@gmail.com]
Sent: 12/16/2016 8:59:29 AM
To: Stephanie Winston Wolkoff [swinstonwolkoff@swwcreative.com]
Subject: Ongoings - Adds
Attachments: 2016 12 15_Ongoings.xlsx

Attached are ongoing added from Weds + Thurs.

Highlights to address with DJT.

This full list to be added to former Ongoings list.

--

Devon R. Weiss

weissdr@gmail.com | (508) 633-5599

- www.linkedin.com/in/devonweiss/
-
-

DOCUMENT PRODUCED NATIVELY – DCAG-00009496

ONGOINGS

Category	Task	Due	Owner	Collaborate with	Notes	Visible to
Entertainment	Need every element available for request		Tina		Ramsey requested again on 12/15	
Entertainment	Determine entertainment for Concert on the Mall		SWW team	Suzanne		
Entertainment	Write Tom about Steve Wynn		SWW	Tom	Steve recommended "40 Hours a Week" by Alabama for 1/20 event	
Team Coordination	Overview of SWW broadcast responsibility vs. Hargrove		SWW			
Entertainment	Determine who Tommy Hicks and Gentry are (going with Don Jr.)				Don Jr. and Eric hosting a hunting trip (16 people) on 1/21 (same date as Million Women March), each member pays \$1M, Cabellas sponsoring	
Entertainment	Obtain costs for Lorne Balfe		SWW	Golnar	Hans Zimmer is out, Steve Kofsky assisting	
Entertainment	Find name of Hans Zimmer and Steve Kofsky tour show					
	Contact Jeff Zucker - Saturday go or no go?		SWW	Jeff Zucker		
Personal	Schedule time to see Deborah-lee Jackman Furness		SWW	Deborah		
Entertainment	Check in with Mark to see if Tom provided a performer		SWW	Mark		
Entertainment	Determine where Bocelli is performing (Kennedy Center vs. Union Station / Conv. Center)		SWW	DJT?	Donation to Bocelli's wife's org (AMFAR)	
Design	Prepare to meet Fabrics after meeting with DJT and Bocelli		SWW	SWW team		
Music	Determine via Johnny what DJT's playlist preferences are and when they will play		SWW	Johnny		
Events	Determine details for Prayer breakfast		SWW			
Entertainment	Prepare to present general concept of Concert on the Mall to DJT		SWW		Concert on the Mall idea is likely scrapped	
Press	Give Boris OK to share Bocelli to press after 12/16 meeting w/ DJT		SWW	Boris		
Entertainment	Tell Suzanne not to contact Voight directly		Jon	Suzanne	Complete - waiting for confirmation from Suzanne	
Entertainment	Ask DJT and Mark about Voight		SWW	DJT and Mark		
Entertainment	Consider Bocelli with Kathryn McPhee - call Leslie		SWW	Leslie		
Timing	Determine timing of events before Candlelight Dinner so Melania can change/prepare		SWW	SWW team		
Cabinet	Set up Tim with Melania to discuss Events Director position		SWW		Tim to send SWW his resume on 12/15	
Logistics	Prepare to address drones with DJT		SWW		Coordinated with Security and FAA; cannot fly over water	
Programming	Change events to NOT include Working Canines		SWW		Use opportunity to station placefillers on WH Ellipse	
Logistics	If Concert on Mall continues, have George Tajikos contact USSS re helicopter		SWW		6 USSS required, but helicopter only seats 6 total	
Timing	Ask about wreath laying timing		SWW		7:30-8 may be the only time	
Programming	Discuss applications for Parade		SWW		Military, First Responders, Law Enforcement	
	Consider an event for Vets		SWW		Karen Kraft and Stan Lee	
	Tim to contact Tech Support Division regarding armour/plexiglass podium		Tim			
	Ask DJT about Staff Appreciation timing - Saturday Sunday or Monday?		SWW	DJT	He will want to likely get it done over weekend, can speak for any desired duration	
	Ask Melania about Friends and Family White House Tea		SWW	Melania	There should be NO reception	
	Ask DJT about whether we will have Inaugural Celebration at Trump Hotel					
	Ask DJT about cost of ALL EVENTS at Trump Hotel (Leadership Lunch, Inaug. Celebration)					
	Get Tim's parents tickets to the Ball in Convention Center					
	Insert picture sent to SWW for wreath laying					
	Obtain burial schedule at Arlington National Cemetary		SWW			
	Decide if we want middle names/initials included for burial					
	Determine MC at EVERY event					
Ceremonial Support	Determine military support at every event, regardless if VP or POTUS present		SWW	PIC, JTF	Not appropriate to get support during National Prayer Service	
Ceremonial Support	Submit one ceremonial support request for each event - need to requested based on the event Host, must get legall approved					

Ceremonial Support	Options include				
	<i>Fife and drum</i>				
	<i>Drill team</i>				
	<i>Strolling reception</i>				Consider for reception to dinner transition music
	<i>Harpist - likely for Candlelight Dinner</i>				Consider for reception to dinner transition music
	<i>String Trio - likely for Candlelight Dinner</i>				Can be non-intrusive and stay to edges of venue
	<i>Armed Services Color Guard - anthem vocalist can do a capella for Color Guard</i>				Must have time to present the colors, with silence and attention of attendees; entertainment we bring cannot play the anthem if we have an Armed Services Color Guard
	<i>Patriotic Band - band cannot serve as background music/entertainment if there is a Patriotic Opener</i>				
	<i>Army Chorus</i>				
	<i>Brass Quartet</i>				
Ceremonial Support	Request Unofficial Cordon for entrance and exits				
Ceremonial Support	Determine uniforms for each armed services support (Armed Services Color Guard has one uniform whereas Navy has 5)				
Ceremonial Support	Obtain POCs for AMVID to get digital and filming coverage consent		Tina, PIC	AMVID	
Ceremonial Support	Obtain bios and photos of dancers ahead of time				Applications already went out, we get alternates, interview process, government decides who
	Need the song for the first dance		SWW	DJT, Johnny	
Ceremonial Support	Do not include Ceremonial Support request for the Victory Reception Welcome at the National Building Museum				
	Change invite verbiage for VP's dinner hosted by PIC at National Gallery of Art				
Timing	Determine how long we need to shut down every site prior to event				If we shutdown Union Station days in advance, consider giving food out
Programming	Consider planning a children's event open to the public				
Flowers	Schedule walkthrough at studio - Amyryllis				

Message

From: Stephanie Winston Wolkoff [swinstonwolkoff@swwcreative.com]
Sent: 12/16/2016 8:37:38 PM
To: Rick Gates [rgates@58pic2017.org]; Sara Armstrong [sarmstrong@58pic2017.org]
CC: Tom Barrack [tombarrackpersonal@gmail.com]; Matthew Grimes [mgrimes@tombarrack.com]; Jon Reynaga [jon@tinyhorse.com]
Subject: UPDATES as of 12.16.16

Dear Rick and Sara,
I hope you had a good day. I wanted to send you a complete list of updates.
Some are regarding my meeting with IT and DJT today.

<!--[if !supportLists]-->• <!--[endif]-->They do not want the Beach Boys or any other talent except the type we are getting for the dinners, galas, and variety.

<!--[if !supportLists]-->• <!--[endif]-->SWW Is getting costs for Lorne Balfe and Steve Kofsky. SWW in discussions now with Golnar and Steve.

<!--[if !supportLists]-->• <!--[endif]-->SWW spoke with IT for price for Trump Hotel for all events

<!--[if !supportLists]-->• <!--[endif]-->Determine military support at every event, regardless if VP or POTUS present

<!--[if !supportLists]-->• <!--[endif]-->Submit one ceremonial support request for each event - need to requested based on the event Host, must get legal approved. SWW working on document and Ramsey to submit to Tina.

<!--[if !supportLists]-->• <!--[endif]-->Request Unofficial Cordon for entrance and exits

<!--[if !supportLists]-->• <!--[endif]-->Determine uniforms for each armed services support (Armed Services Color Guard has one uniform whereas Navy has 5)

<!--[if !supportLists]-->• <!--[endif]-->Obtain POCs for AMVID to get digital and filming coverage consent

<!--[if !supportLists]-->• <!--[endif]-->Obtain bios and photos of dancers ahead of time

<!--[if !supportLists]-->• <!--[endif]-->Option: Fife and drum

<!--[if !supportLists]-->• <!--[endif]-->Option: Drill team

<!--[if !supportLists]-->• <!--[endif]-->Option: Strolling reception

<!--[if !supportLists]-->• <!--[endif]-->Option: Harpist - likely for Candlelight Dinner

<!--[if !supportLists]-->• <!--[endif]-->Option: String Trio - likely for Candlelight Dinner

<!--[if !supportLists]-->• <!--[endif]-->Option: Armed Services Color Guard - anthem vocalist can do a capella for Color Guard

<!--[if !supportLists]-->• <!--[endif]-->Option: Patriotic Band - band cannot serve as background

music/entertainment if there is a Patriotic Opener

<!--[if !supportLists]-->● <!--[endif]-->Option: Army Chorus

<!--[if !supportLists]-->● <!--[endif]-->Option: Brass Quartet

<!--[if !supportLists]-->● <!--[endif]-->SWW to discuss with Tom regarding SM and his Chariman's Global Dinner

<!--[if !supportLists]-->● <!--[endif]-->Drones have been approved by DJT and IT

<!--[if !supportLists]-->● <!--[endif]-->SWW wrote Tom about Steve Wynn, awaiting response. Rick reached out to SWW to HOLD performance.

<!--[if !supportLists]-->● <!--[endif]-->Showstoppers on hold as per Rick's email on 12.16.16

<!--[if !supportLists]-->● <!--[endif]-->SWW confirmed Steven Kofsky at Lorne Balfe. Aimee create bio on all entertainers.

<!--[if !supportLists]-->● <!--[endif]-->DJT and IT confirmed that we will not have BEACH BOYS or any other entertainers of this stature.

<!--[if !supportLists]-->●

<!--[if !supportLists]-->●

<!--[if !supportLists]-->● Rick and Sarah for an approved entertainment formal ask template

<!--[if !supportLists]-->●

<!--[if !supportLists]-->●

<!--[if !supportLists]-->● <!--[endif]-->Event names and times need to be confirmed

<!--[if !supportLists]-->● <!--[endif]-->Schedule walkthrough at studio - Amyryllis

<!--[if !supportLists]-->● <!--[endif]-->Must review guest chefs brought over by Design Cuisine

<!--[if !supportLists]-->● <!--[endif]-->SWW to review gifts for donors with MT, we can use WHSS or we can get our own

<!--[if !supportLists]-->●

<!--[if !supportLists]-->●

<!--[if !supportLists]-->● <!--[endif]-->SWW to be sent guest lists to begin seating plans for Friends and Family Guestlist for seating for Candlelight Dinner and the Parade

<!--[if !supportLists]-->● <!--[endif]-->SWW needs a guest list for the Candlelight Dinner

<!--[if !supportLists]-->● <!--[endif]-->Change invite verbiage for VP's dinner hosted by PIC at

National Gallery of Art

<!--[if !supportLists]-->● <!--[endif]-->Invitations: want to know if guests will understand if DJT and MT will actually be in attendance given the way they are written

<!--[if !supportLists]-->● <!--[endif]-->If Concert on Mall continues, have George Tajikos contact USSS re helicopter

<!--[if !supportLists]-->●

<!--[if !supportLists]-->● <!--[endif]-->DJT confirmed there will be NO performances on the Mall, except for the Civilian Pageantry and Military

<!--[if !supportLists]-->● <!--[endif]-->DJT confirmed that he would like to arrive to the Mall in a Military plane with Military escorting him

<!--[if !supportLists]-->● <!--[endif]-->DJT and IT confirmed they would like to have a full Military parade as well as tanks and helicopters on ground, during the parade

<!--[if !supportLists]-->●

<!--[if !supportLists]-->●

<!--[if !supportLists]-->● <!--[endif]-->Make sure that DJT's playlist preferences are at the Swearing In

<!--[if !supportLists]-->● <!--[endif]-->The JTF special events groups, SWW to review and to assign to each event

<!--[if !supportLists]-->● <!--[endif]-->Ramsey to submit requests to Tina for each event's military support with Tina

<!--[if !supportLists]-->● <!--[endif]-->The JTF will be in attendance at every event with unofficial cordon, armed services color guard, and flags

<!--[if !supportLists]-->● <!--[endif]-->Discuss applications for Parade

<!--[if !supportLists]-->● <!--[endif]-->Consider an event for Vets

<!--[if !supportLists]-->●

<!--[if !supportLists]-->● <!--[endif]-->Consider planning a children's event open to the public

<!--[if !supportLists]-->● <!--[endif]-->The Staff Appreciation Luncheon at 10a Monday - SWW needs to confirm

<!--[if !supportLists]-->● <!--[endif]-->Each event/venue/room must be done by Sunday evening

<!--[if !supportLists]-->● <!--[endif]-->Confirm that NO tea will be hosted at WH and must be removed from schedule

<!--[if !supportLists]-->● <!--[endif]-->Tim to contact Tech Support Division regarding

armour/plexiglass podium

<!--[if !supportLists]-->● <!--[endif]-->Determine timing of events before Candlelight Dinner so Melania can change/prep

<!--[if !supportLists]-->● <!--[endif]-->Determine how long we need to shut down every site prior to event

<!--[if !supportLists]-->● <!--[endif]-->Wynn calling Tom to discuss, Wynn does not want it at Convention Center

<!--[if !supportLists]-->●

<!--[if !supportLists]-->● <!--[endif]-->Obtain burial schedule at Arlington National Cemetery

<!--[if !supportLists]-->● <!--[endif]-->SWW to confirm with Gary at Arlington National Cemetery timing of arrival of President-elect Mr. Trump

<!--[if !supportLists]-->● <!--[endif]-->SWW waiting for response regarding past ceremony times for wreath laying

<!--[if !supportLists]-->● <!--[endif]-->As per DJT, if it has been 7:30am then that is what it will be

Best,
SWW



STEPHANIE WINSTON WOLKOFF | PRESIDENT & CEO
632 WEST 28TH STREET | FIFTH FLOOR | NEW YORK NY 10011

NOTICE: This electronic mail transmission and its attachments may contain information that is confidential, privileged or proprietary and is for the sole purposes of the intended recipients only. If you are not the intended recipient, you are hereby notified that you are not authorized to read, print, retain copy or disseminate this message, any part of it, or any attachments. If you have received this message in error, please delete this message and any attachments from your system without reading the content and notify the sender immediately of the inadvertent transmission by reply e-mail to sender. Thank you for your cooperation.