

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 <i>et al.</i>,</p> <p style="text-align:center">Defendants.</p>	<p>Civil Action No.: 2020 CA 000488 B</p>
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CONSENT MOTION FOR ENTRY OF SETTLEMENT ORDER

1. Plaintiff, the District of Columbia (“District”), with the consent of Defendants 58th Presidential Inaugural Committee, Trump Old Post Office LLC d/b/a/ Trump International Hotel Washington D.C., and Trump Organization LLC (“Defendants,” and together with the District, the “Parties”), respectfully moves this court to enter the attached Settlement Order in Case No. 2020 CA 000488 B.

2. The Parties have agreed to the terms set out in the attached Settlement Order to resolve this case. If entered, the Settlement Order would resolve the District’s claims in this case.

3. Wherefore, for the foregoing reasons, the District, with the consent of Defendants, respectfully requests that the Court enter the attached Settlement Order.

Dated: May 3, 2022

Respectfully submitted,

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Attorney General for the District of Columbia

KATHLEEN KONOPKA
Deputy Attorney General
Public Advocacy Division

/s/ Jimmy R. Rock
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POINTS AND AUTHORITIES IN SUPPORT

1. The points and authorities and record cited herein.
2. The Court's inherent power to control its own docket.
3. The Defendants' consent to the relief requested in this Motion.

RULE 12-I(a) CERTIFICATION

Undersigned counsel contacted counsel for Defendants on April 29, 2022. Defendants consent to entry of the Settlement Order.

/s/ Matt James
MATT JAMES
Assistant Attorney General

CERTIFICATE OF SERVICE

I, Matt James, certify that on May 3, 2022, a copy of the foregoing Motion was served on all counsel of record via the Court's Casefilexpress service.

/s/ Matt James
MATT JAMES
Assistant Attorney General

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

Plaintiff District of Columbia (“District”) and Defendants 58th Presidential Inaugural Committee (“PIC”), Trump Old Post Office LLC d/b/a Trump International Hotel Washington D.C. (“Trump Hotel”), and Trump Organization LLC (“Trump Organization”) (“Defendants” and collectively with the District, the “Parties”), have jointly agreed to settle this action pursuant to the terms stated in this Settlement Order (“Order”). The Parties agree that settlement of this action is in the public interest and entry of this Order is the most appropriate means of resolving the District’s claims and the Defendants’ defenses in this case. The Parties have agreed to the relief set forth in this Order, and agree to and shall be bound by its requirements.

It is therefore this ___ day of _____, 2022, by the Superior Court of the District of Columbia, **ORDERED** and **ADJUDGED** as follows:

1. As set out in the District’s Complaint, the District alleges that the PIC, a nonprofit corporation, improperly spent nonprofit funds by (i) overpaying for events at the Trump Hotel to the private benefit of the Trump Hotel and Trump Organization and (ii) paying for a hotel room contract at the Loews Madison Hotel. The District alleges that these payments caused the PIC to

exceed or abuse its lawful authority and to act contrary to its nonprofit purposes, in violation of D.C. Code § 29-412.20 and the common law.

2. Defendants dispute these allegations on numerous grounds and deny having engaged in any wrongdoing or unlawful conduct.

3. To avoid the cost, burden, and risks of further litigation, the Parties now agree to resolve these disputed claims through entry of this Order without it being in any way deemed or construed as an admission of wrongdoing, unlawful conduct, or liability on the part of Defendants.

4. In order to fully and finally resolve the District's claims, Defendants agree to pay to the District the total sum of Seven Hundred Fifty Thousand Dollars (\$750,000). The District will receive and pay out these funds to the benefit of the following District nonprofit corporations in the listed amounts: (1) Mikva Challenge Grant Foundation (\$375,000); and (2) DC Action for Children Today DC ACT (\$375,000).

5. The Trump Hotel represents that it is in the process of selling its interest in the Trump Hotel to a third party with an expected closing in the spring of 2022.

6. The PIC represents that none of its current directors or officers presently serve or presently intend to serve as a director or officer of any nonprofit organization incorporated in the District.

7. Under this Order, the District relinquishes any claims it had, has or could have, or available to, the Office of the Attorney General for the District of Columbia against Defendants, under the District's Nonprofit Corporation Act, D.C. Code § 29-412.01 *et seq.* or the common law, relating in any way to the 2017 Presidential Inauguration.

8. This Order is final and enforceable as to the Parties. The Parties relinquish any right to appeal the terms of this Order.

9. This Order of Settlement may be executed in counterparts by the Parties, and signature pages transmitted electronically may be treated as originals.

10. The Court retains jurisdiction over this matter to enforce the terms of this Order. As this order fully resolves this matter, the Clerk will administratively close this case.

SO ORDERED.

Judge Yvonne Williams

Date: _____, 2022

FOR PLAINTIFF DISTRICT OF COLUMBIA:

KARL A. RACINE
Attorney General for the District of Columbia

Kathleen Konopka

KATHLEEN KONOPKA
Deputy Attorney General, Public Advocacy Division

Dated: 4/24/2022

Jimmy Rock

JIMMY R. ROCK
Assistant Deputy Attorney General, Public Advocacy Division

Dated: 4/23/2022

Jennifer Jones

JENNIFER C. JONES
Senior Trial Counsel, Public Advocacy Division

Dated: 4/23/2022

FOR DEFENDANT 58th PRESIDENTIAL INAUGURAL COMMITTEE:

By: Sara Armstrong

Dated: 4/22/2022

Title: CEO

FOR DEFENDANT TRUMP OLD POST OFFICE, LLC:

By: [Signature]

Dated: 4/22/2022

Title: General Counsel

FOR DEFENDANT TRUMP ORGANIZATION LLC:

By: [Signature]

Dated: 4/22/2022

Title: General Counsel