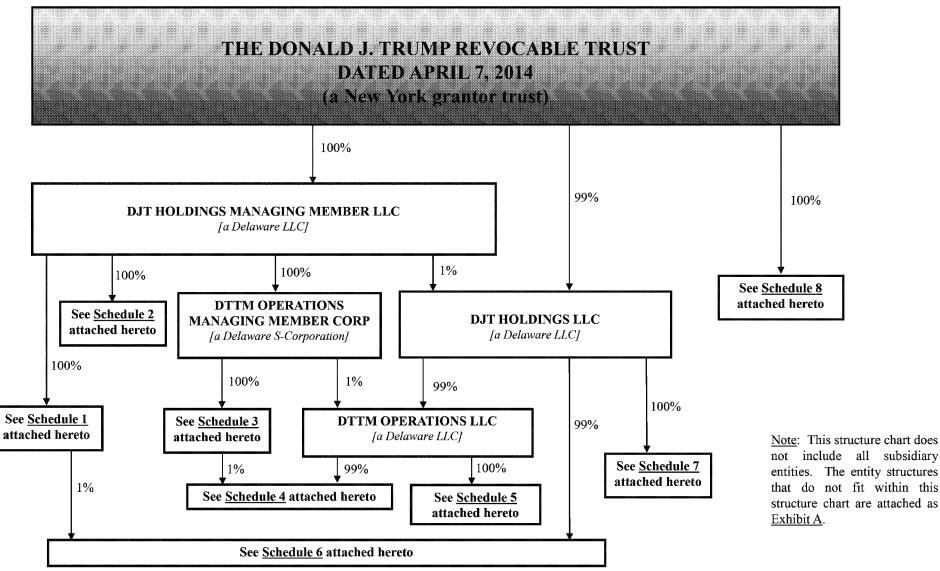
# Verified Complaint

## Exhibit # 2



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entities. The entity structures that do not fit within this structure chart are attached as

TTO\_02355780

### Schedule 1

Entities in which DJT Holdings Managing Member LLC holds a 100% interest, each of which is a Managing Member with a 1% interest of the applicable entity listed on Schedule 6

4 Shadow Tree Lane Member Corp 809 North Canon Member Corporation D B Pace Acquisition Member Corp The Caribusiness RE Corp DT Dubai Golf Manager Member Corp DT Tower I Member Corp DTTM Operations Managing Member Corp Excel Venture I Corporation **Golf Productions Member Corp** Jupiter Golf Club Managing Member Corp LFB Acquisition Member Corp Mobile Payroll Construction Manager Corp Panama Ocean Club Management Member Corp Pine Hill Development Managing Member Corp THC Baku Hotel Manager Services Member Corp THC Baku Services Member Corp THC Central Reservations Member Corp THC China Technical Services Manager Corp THC Development Brazil Managing Member Corp THC Miami Restaurant Hospitality Member Corp THC Qatar Hotel Manager Member Corp THC Rio Managing Member Corp THC Sales & Marketing Member Corp THC Services Shenzhen Member Corp THC Shenzhen Hotel Manager Member Corp The Trump Follies Member Inc.

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TNGC Charlotte Manager Corp TNGC Dutchess County Member Corp TNGC Jupiter Managing Member Corp TNGC Pine Hill Member Corp Trump Books Manager Corp Trump Canouan Estate Member Corp Trump Carousel Member Corp Trump Chicago Commercial Member Corp Trump Chicago Hotel Member Corp Trump Chicago Residential Member Corp Trump Chicago Retail Member Corp Trump Development Services Member Corp Trump Drinks Israel Member Corp Trump Endeavor 12 Manager Corp Trump Florida Manager Corp Trump Golf Coco Beach Member Corp Trump International Development Member Corp Trump International Golf Club, Inc. Trump Las Olas Member Corp Trump Marks Asia Corp Trump Miami Resort Management Member Corp Trump National Golf Club Colts Neck Member Corp Trump National Golf Club Member Corp Trump National Golf Club Washington DC Member Corp Trump Panama Condominium Member Corp Trump Panama Hotel Management Member Corp Trump Productions Managing Member Inc. Trump Sales & Leasing Chicago Member Corp Trump Scotsborough Square Member Corp

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Trump Vineyard Estates Manager Corp
Trump Virginia Acquisitions Manager Corp
Trump Virginia Lot 5 Manager Corp
Trump World Productions Manager Corp
Turnberry Scotland Managing Member Corp
TW Venture I Managing Member Corp
Unit 2502 Enterprises Corp
White Course Managing Member Corp

### Schedule 2

Entities in which DJT Holdings Managing Member LLC holds a 100% interest and which do not meet the requirements of Schedule 1

Aviation Payroll Company

Briarcliff Properties, Inc.

Development Member Inc.

DJT Land Holdings Member Corp

DT Bali Hotel Manager Member Corp

DT Bali Manager Member Corp

DT Bali Technical Services Manager Member Corp

DT Dubai II Golf Manager Member Corp

DT Lido Golf Manager Member Corp

DT Lido Hotel Manager Member Corp

DT Lido Technical Services Manager Member Corp

DTW Venture Managing Member Corp

Flights Inc.

Helicopter Air Services Inc.

Mar-a-Lago Club Inc

OPO Hotel Manager Member Corp

Parc Consulting, Inc.<sup>1</sup>

Reg-Tru Equities, Ltd

RPV Development LLC

THC Vancouver Management Corp

The Trump Hotel Corp

The Trump Organization, Inc.

TIGL Common Area Management Corp

**TIHM Member Corp** 

<sup>&</sup>lt;sup>1</sup> Board to consist of at least three directors. Two are independent directors in place before the restructuring.

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Trump Central Park West Corp

Trump Empire State Inc.

Trump Las Vegas Corp

Trump Las Vegas Sales & Marketing, Inc.

Trump Pageants, Inc.

Trump Payroll Corp

Trump Scotland Member Inc.

Trump Toronto Development Inc.

Trump Toronto Hotel Management Corp

Ultimate Air Corp

Travel Enterprises Management Inc.

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NYSCEF DOC. NO. 4

### Schedule 3

Entities in which DTTM Operations Managing Member Corp holds a 100% interest, each of which may be a Managing Member with a 1% interest of the applicable entity listed on Schedule 4

- C Development Ventures Member Corp
- DT App Warrant Holding Managing Member Corp
- DT Endeavor I Member Corp
- DT Home Marks International Member Corp
- DT India Venture Managing Member Corp
- DT Marks Baku Managing Member Corp
- DT Marks Bali Member Corp
- DT Marks Dubai Member Corp
- DT Marks Gurgaon Managing Member Corp
- DT Marks Lido Member Corp
- DT Marks Products International Member Corp
- DT Marks Pune II Managing Member Corp
- DT Marks Pune Managing Member Corp
- DT Marks Qatar Member Corp
- DT Marks Rio Member Corp
- DT Marks Vancouver Member Corp
- DT Marks Worli Member Corp
- DT Tower II Member Corp
- DT Tower Kolkata Managing Member Corp
- DT Venture I Member Corp
- DT Venture II Member Corp
- EID Venture I Corporation
- Poker Venture Managing Member Corp
- THC Venture II Managing Member Corp
- The Trump Marks Real Estate Corp

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Trump AC Casino Marks Member Corp Trump EU Marks Member Corp Trump Home Marks Member Corp Trump Marks Atlanta Member Corp Trump Marks Batumi Managing Member Corp Trump Marks Canouan Managing Member Corp Trump Marks Chicago Member Corp Trump Marks Dubai Corp Trump Marks Egypt Corp Trump Marks Fine Foods Member Corp Trump Marks Ft Lauderdale Member Corp Trump Marks GP Corp Trump Marks Hollywood Corp Trump Marks Istanbul II Corp Trump Marks Jersey City Corp Trump Marks Las Vegas Corp Trump Marks Mattress Member Corp Trump Marks Menswear Member Corp Trump Marks Mortgage Corp Trump Marks Mumbai Member Corp Trump Marks New Rochelle Corp Trump Marks Palm Beach Corp Trump Marks Panama Corp Trump Marks Philippines Corp Trump Marks Products Member Corp Trump Marks Puerto Rico I Member Corp Trump Marks Punta Del Este Manager Corp Trump Marks Soho License Corp Trump Marks Stamford Corp

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Trump Marks Sunny Isles I Member Corp Trump Marks Sunny Isles II Member Corp Trump Marks Tampa Corp Trump Marks Toronto Corp Trump Marks Westchester Corp

Trump Marks White Plains Corp

### Schedule 4

Entities in which DTTM Operations LLC holds a 99% interest and in which the applicable Schedule 3 entity holds a 1% interest

C Development Ventures LLC

DT App Warrant Holding LLC

DT Home Marks International LLC

DT India Venture LLC

DT Marks Baku LLC

DT Marks Bali LLC

DT Marks Dubai LLC

DT Marks Gurgaon LLC

DT Marks Lido LLC

DT Marks Products International LLC

DT Marks Pune II LLC

DT Marks Pune LLC

DT Marks Qatar LLC

DT Marks Rio LLC

DT Marks Vancouver LP

DT Marks Worli LLC

DT Tower II LLC

DT Tower Kolkata LLC

EID Venture I LLC

Poker Venture LLC

THC Venture II LLC

Trump AC Casino Marks LLC

Trump EU Marks LLC

Trump Home Marks LLC

Trump Marks Atlanta LLC

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Trump Marks Batumi LLC

Trump Marks Canouan LLC

Trump Marks Chicago LLC

Trump Marks Dubai LLC

Trump Marks Egypt LLC

Trump Marks Fine Foods LLC

Trump Marks Ft Lauderdale LLC

Trump Marks Holdings L.P.

Trump Marks Hollywood LLC

Trump Marks Istanbul II LLC

Trump Marks Jersey City LLC

Trump Marks Las Vegas LLC

Trump Marks Mattress LLC

Trump Marks Menswear LLC

Trump Marks Mtg LLC

Trump Marks Mumbai LLC

Trump Marks New Rochelle LLC

Trump Marks Palm Beach LLC

Trump Marks Panama LLC

Trump Marks Philippines LLC

Trump Marks Products LLC

Trump Marks Puerto Rico I LLC

Trump Marks Punta Del Este LLC

Trump Marks Real Estate LLC

Trump Marks SoHo LLC

Trump Marks Stamford LLC

Trump Marks Sunny Isles I LLC

Trump Marks Sunny Isles II LLC

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Trump Marks Tampa LLC Trump Marks Toronto LLC Trump Marks Westchester LLC Trump Marks White Plains LLC

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### Schedule 5

### Entities in which DTTM Operations LLC holds a 100% interest

DT Marks Jersey City LLC

DT Marks Jupiter LLC

NYSCEF DOC. NO. 4

### Schedule 6

Entities in which DJT Holdings LLC holds a 99% interest and in which the applicable Schedule 1 entity holds a 1% interest

4 Shadow Tree Lane LLC

809 North Canon LLC

Caribusiness MRE LLC

D B Pace Acquisition, LLC

DT Dubai Golf Manager LLC

DT Tower I LLC

DTTM Operations LLC

Excel Venture I LLC

**Golf Productions LLC** 

Jupiter Golf Club LLC

LFB Acquisition LLC

Mobile Payroll Construction LLC

Panama Ocean Club Management LLC

Pine Hill Development LLC

THC Baku Hotel Manager Services LLC

THC Baku Services LLC

THC Barra Hotelaria Ltda.

THC Central Reservations LLC

THC China Technical Services LLC

THC Development Brazil LLC

THC Miami Restaurant Hospitality LLC

THC Qatar Hotel Manager LLC

THC Rio Manager LLC

THC Sales & Marketing LLC

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THC Services Shenzhen LLC

THC Shenzhen Hotel Manager LLC

The Trump Follies LLC

TNGC Charlotte LLC

TNGC Dutchess County LLC

TNGC Jupiter Management LLC

TNGC Pine Hill LLC

Trump Books LLC

Trump Canouan Estate LLC

Trump Carousel LLC

Trump Chicago Commercial Manager LLC

Trump Chicago Hotel Manager LLC

Trump Chicago Residential Manager LLC

Trump Chicago Retail Manager LLC

Trump Development Services LLC

Trump Drinks Israel LLC

Trump Endeavor 12 LLC

Trump Florida Management LLC

Trump Golf Coco Beach LLC

Trump International Development LLC

Trump International Golf Club Scotland Limited

Trump Las Olas LLC

Trump Marks Asia LLC

Trump Miami Resort Management LLC

Trump National Golf Club Colts Neck LLC

Trump National Golf Club LLC

Trump National Golf Club Washington DC LLC

Trump Panama Condominium Management LLC

NYSCEF DOC. NO. 4

Trump Panama Hotel Management LLC

**Trump Productions LLC** 

Trump Sales & Leasing Chicago LLC

Trump Scotsborough Square LLC

Trump Vineyard Estates LLC

Trump Virginia Acquisitions LLC

Trump Virginia Lot 5 LLC

Trump World Productions LLC

Turnberry Scotland LLC

TW Venture I LLC

TW Venture II LLC

Unit 2502 Enterprises LLC

White Course LLC

NYSCEF DOC. NO. 4

### Schedule 7

#### Entities in which DJT Holdings LLC holds a 100% interest

81 Pine Note Holder Inc. Ace Entertainment Holdings Inc. Bedford Hills Corp. Chicago Unit Acquisition LLC China Trademark LLC DJ Aerospace (Bermuda) Limited<sup>2</sup> DJT Entrepreneur Managing Member LLC DJT Entrepreneur Member LLC DT Venture I LLC DT Venture II LLC DTW Venture LLC Florida Properties Management LC Indian Hills Holdings LLC Lamington Family Holdings LLC Ocean Development Member Inc. **OWO** Developer LLC Scotland Acquisitions LLC THC Hotel Development LLC **TIHC Reservations LLC** TIHT Chicago Member Acquisition LLC TIHT Holding Company LLC TMG Member, LLC Toronto Development LLC Trump 106 CPS LLC <sup>2</sup> Entity also includes independent directors.

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**Trump Acquisition Corp Trump Brazil LLC** Trump Caribbean LLC Trump Chicago Development LLC Trump Chicago Managing Member LLC Trump Chicago Member LLC Trump Golf Acquisitions LLC Trump Golf Management LLC Trump Ice Inc. Trump Ice LLC Trump Korean Projects LLC Trump Las Vegas Development LLC Trump Lauderdale Development LLC Trump Lauderdale Development No 2 LLC Trump Marketing LLC Trump Organization LLC Trump Phoenix Development LLC Trump Realty Services LLC Trump Restaurants LLC Trump Riverside Management LLC Trump Soho Member LLC **Trump World Publications LLC** West Palm Operations LLC Wollman Rink Operation LLC

Yorktown Real Estate LLC

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### Schedule 8

### Entities in which The Donald J. Trump Revocable Trust dated April 7, 2014 holds a 100% interest

DJT Aerospace LLC

DJT Operations I LLC

DJT Operations II LLC

DT Connect II Member Corp

DT Endeavor I LLC

EID Venture II Member Corp

Fifty-Seven Management Corp

First Member Inc

Plaza Consulting Corp

Storage 106 LLC

The Donald J. Trump Company LLC

The Trump Corporation

TIHH Member Corp

TIHH Member LLC

TIHT Member LLC

Tipperary Realty Corp.

Trump 845 LP LLC

Trump 845 UN Mgr Corp

Trump 845 UN MGR LLC

Trump Canadian Services, Inc.

Trump CPS Corp

Trump Delmonico LLC

Trump Ferry Point Member Corp

Trump Marks Philadelphia Corp

Trump Marks Waikiki Corp

NYSCEF DOC. NO. 4

Trump Park Avenue Acquisition LLC Trump Plaza Member Inc<sup>3</sup> Trump Tower Managing Member Inc.<sup>4</sup> Trump's Castle Management Corp TTTT Venture Member Corp

<sup>&</sup>lt;sup>3</sup> One independent director in place before the restructuring.

<sup>&</sup>lt;sup>4</sup> Two independent directors in place before the restructuring.

Schedule 8

NYSCEF DOC. NO. 4

### Exhibit A

### Description of Alternative Structures

(where available, specific structure charts may be attached at the end of this exhibit)

### **1. Fred Trump Entities**

- All County Building Supply & Maintenance Corp.
- Beach Haven Apartments #3 LLC
- Beach Haven Apt#1, Inc.
- Beach Haven Mgt. Corp.
- Beach Haven Shopping Center LLC
- Chelsea Hall LLC
- Clyde Hall, Inc.
- Coronet Hall, Inc.
- Country Apartments, LLC
- Country Investors LLC
- Country Properties, LLC
- Fountainbleu Apartments LLC
- Highlander Hall, Inc.
- Lawrence Towers Apartments LLC
- Midland Associates
- Oakdale Investors
- Ocean Air Investors
- Park Briar Associates
- Shore Haven Apt#1, Inc.
- Shore Haven Management Corp.
- Shore Haven Shopping Center LLC
- Sussex Hall, Inc.
- Trump Management Inc.
- Trump Village Construction Corp
- Wexford Hall Inc
- Wilshire Hall LLC

### 2. Vornado Entities

- Hudson Waterfront Associates I, LP
- Hudson Waterfront Associates II, LP
- Hudson Waterfront Associates III, LP
- Hudson Waterfront Associates IV, LP
- Hudson Waterfront Associates V, LP
- Hudson Waterfront Associates, LP
- HWA 556 Owners, LLC

Exhibit A

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- 1290 Avenue of the Americas, a Tenancy-in-Common
- HWA 1290 III LLC
- HWA 1290 IV LLC
- HWA 1290 V LLC

### 3. Other Investments with Outside Holders

- A. TTTT Ventures and Subsidiaries
  - TTTT Venture LLC
  - DT Bali Golf Manager LLC
  - DT Bali Hotel Manager LLC
  - DT Bali Technical Services Manager LLC
  - DT Dubai II Golf Manager LLC
  - DT Lido Golf Manager LLC
  - DT Lido Hotel Manager LLC
  - DT Tower Gurgaon LLC
  - DT Lido Technical Services Manager LLC
  - TC Marks Buenos Aires LLC
- B. Donald J. Trump Enterprises (vehicles for trust planning that have since been superseded)
  - Donald J. Trump Enterprises LLC
  - Donald J. Trump Enterprises II LLC
  - Donald J. Trump Enterprises III LLC
- C. Trump Model Management
  - Trump Model Management LLC
- D. Trump U
  - The Trump Entrepreneur Initiative LLC (NY)
  - The Trump Entrepreneur Initiative LLC (DE)
  - Trump Education ULC

### 4. Specific Real Estate Locations

- A. Trump Tower (725 Fifth Avenue)
  - The Trump-Equitable Fifth Avenue Company
  - Trump Tower Commercial LLC
  - Fifty-Seventh Street Associates LLC
- B. 40 Wall Street
  - 40 Wall Development Associates, LLC

Exhibit A

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- 40 Wall Street Commercial LLC
- 40 Wall Street LLC
- 40 Wall Street Member Corp<sup>5</sup>
- C. Trump Park Avenue (502 Park Avenue)
  - Trump Park Avenue LLC<sup>6</sup>
- D. Trump World Tower (845 United Nations Plaza)
  - 845 UN Limited Partnership
  - Trump 845 UN GP LLC
- E. Trump International Hotel and Tower Condominium (One Central Park West)
  - One Central Park West Associates
  - One Central Park West PT Associates
- F. Old Post Office
  - Trump Old Post Office LLC
  - Trump Old Post Office Member Corp
  - OPO Hotel Manager LLC
  - THC DC Restaurant Hospitality LLC
- G. Trump International Hotel & Tower Chicago
  - 401 Mezz Venture LLC
  - 401 North Wabash Venture LLC
  - Trump Chicago Retail LLC
  - Trump Commercial Chicago LLC
  - Trump Payroll Chicago LLC
- H. Trump International Hotel Las Vegas
  - Trump Las Vegas Member LLC
  - Trump Las Vegas Managing Member LLC
  - Trump Ruffin LLC
  - Trump Ruffin Tower I LLC<sup>7</sup>
  - Trump Ruffin Commercial LLC
- I. Trump National Golf Club Los Angeles
  - VH Property Corp
  - VHPS LLC

<sup>&</sup>lt;sup>5</sup> Board to consist of at least 3 directors. Two are independent directors in place before the restructuring.

<sup>&</sup>lt;sup>6</sup> One independent director in place before the restructuring.

<sup>&</sup>lt;sup>7</sup> Two independent directors in place before the restructuring.

Exhibit A

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- J. Turnberry
  - Golf Recreation Scotland Limited
  - Nitto World Co., Limited
  - SLC Turnberry Limited
  - DT Connect Europe Limited
- K. Doonbeg
  - TIGL Ireland Enterprises Limited
  - TIGL Ireland Management Limited
  - Doonbeg Common Areas Management Limited
  - Links Common Areas Management Company Limited
- 5. Entities with other Unique Structures
  - A. Owners and/or Percentages Differ from Chart: Split ownership that is not 99/1 or ownership outside "Holdings-HMM" or "DTTM-DTTM MM" structure
    - Briar Hall Operations LLC (split is 99.9/0.1)
    - DT Connect II LLC (split is 99/1 and both the entity and its 1% managing member are under the Trust)
    - DT Tower Gurgaon Managing Member Corp (100% owned by DTTM MM and owns a 1% interest in an entity this is under TTTT Venture LLC)
    - EID venture II LLC (split is 99/1 and both the entity and its 1% managing member are directly under the Trust)
    - Mar-a-Lago Club, LLC (Split is 99.99/0.01. Entity is member managed)
    - Miss Universe L.P., LLLP (split is 98/2)
    - Seven Springs LLC (split is 99.9/0.01)
    - Trump Park Avenue LLC (owned by three separate entities, including one outside entity)
    - The East 61 Street Company LP (owned 99.9/0.1 with the bulk going to the Trust)
    - T International Realty LLC (split with other Trump family members (originally 55/45 but now 60/40 following Ivanka's withdrawal))
    - THC Venture I LLC (split is 99/1 where the 99% owner is Holdings and the 1% managing member is THC Venture I Managing Member Corp, which is 100% owned by DTTM MM (not HMM))
    - TIHT Commercial LLC (split is 99.99/0.01 between Trust, which is the 99.99% holder and the managing member, and TIHT Member LLC)
    - Trump Acquisition LLC (split is 99/1 but the 1% holder (Trump Acquisition Corp) is also under Holdings)
    - Trump Briarcliff Manor Development LLC (split is 99.9/0.1)
    - Trump CPS LLC (split is 99.9/0.1 and both the entity and its 0.1% managing member (Trump CPS Corp) are directly under the Trust) Exhibit A

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- Trump Ferry Point LLC (split 99/1 where the 1% managing member is under the Trust instead of HMM)
- Trump International Golf Club, L.C. (split is 99.999/0.001 and the bulk is in the Trust)
- Trump International Hotels Management LLC (split is 99.9/0.1)
- Trump Marks Philadelphia LLC (split is 99/1 and both the entity and its 1% managing member are directly under the Trust)
- Trump Marks Toronto LP (split is 99/1 and both the entity itself and the 1% managing member (Trump Toronto Member Corp) are under DTTM Managing Member)
- Trump Marks Waikiki LLC (split is 99/1 and both the entity and its 1% managing member are directly under the Trust)
- Trump Palace/Parc LLC (split is 99.9/0.1 and the 99.9% owner is the Trust)
- Trump Plaza LLC (split is 99/1 and the 99% owner is the Trust)
- Trump Toronto Member Corp (100% owned by DTTM MM and doesn't own an interest in an entity also owned by DTTM)
- Trump Wine Marks Member Corp (this is owned 100% by DTTM MM, though it does not own anything that is owned 99% by DTTM)
- Trump Wine Marks LLC (split is 99/1 where the 99% owner is Holdings and the 1% managing member is under DTTM MM (not HMM))
- B. Indirect Subsidiaries Not Captured by Chart: Other Wholly-Owned Subsidiaries of Other Entities
  - Caribusiness Investments, S.R.L.
  - Lamington Farm Club, LLC (Bedminster) (owned by LFB Acquisition LLC)
  - Tag Air Inc. (owned by DJT Operations II LLC)
  - THC China Development LLC (owned by Trump International Hotels Management LLC)
  - THC Imea Development LLC (owned by Trump International Hotels Management LLC)
  - THC Vancouver Payroll ULC (owned by THC Vancouver Management Corp)
  - Trump International Hotel Hawaii LLC
  - Trump Korea LLC
  - Trump Marks LLC (owned by Trump Marks Holdings LP)
  - Trump New World Property Management LLC (owned by New World Property Management Limited and Trump Riverside Management LLC)
  - Trump Vineyard Estates Land Owner LLC (owned by Trump Vineyard Estates LLC)

Exhibit A