

Catering to Conflicts: Influence and Self-Dealing at Trump's Businesses

More than 370 groups have held events, spent money or met with Trump at Trump businesses since the 2016 presidential election, including more than 190 political groups spending \$8.3 million

By Alan Zibel, Research Director, Public Citizen's Corporate Presidency Project1

November 11, 2019 – More than 370 political candidates, foreign governments, businesses, corporate groups, religious groups, charities and other entities have held events at President Donald Trump's properties since the 2016 election. This parade of visitors, documented in a Public Citizen analysis, highlights the conflicts of interest, self-dealing and influence-peddling that have become a way of life in Trump's political circle.

Public Citizen has tracked news reports, social media and Federal Election Commission data for records of expenditures and events at Trump businesses since Trump's election. This analysis, Public Citizen's fourth, finds that dozens of political candidates, companies, trade groups, foreign governments and foreign businesses with interests at stake at the U.S. government have been frequent patrons of Trump properties. Dozens of events were first observed by journalist Zach Everson, who runs the 1100 Pennsylvania newsletter and tracks social media mentions of events at Trump properties on his Twitter feed. This report updates a previous Public Citizen analysis from mid-2018, which identified more than 200 spenders at Trump businesses. The 371 entities holding events and spending money at Trump businesses include:

- 192 political campaigns or political groups
- 51 U.S. businesses or business groups
- 41 conservative advocacy organizations
- 28 foreign governments, officials or political groups
- 16 charities
- 16 religious groups
- 12 state or local groups
- 9 foreign businesses or business groups
- 6 police or fire organizations

¹ Public Citizen interns Gilian Karon, Alexander Raveane and Indy Lea Sobol contributed to this report.

The analysis also examined Federal Election Commission (FEC) records of spending at Trump businesses and found:

- 192 political candidates or political groups have spent a combined \$8.3 million at Trump businesses since the November 2016 election.
- Of those political candidates and groups, 30 spent more than \$10,000 at Trump businesses, while 108 spent more than \$1,000.
- The largest political spender at Trump businesses was Trump's own presidential campaign, which spent nearly \$3.8 million at Trump businesses since the 2016 election, representing about 45 percent of total political spending at Trump properties.
- The biggest beneficiary of political campaigns and groups spending was the Trump International Hotel in Washington, D.C., where political groups have spent nearly \$2.5 million since the 2016 election. Trump's Mar-A-Lago Club in Palm Beach, Fla., and Trump National Doral resort in Miami, Fla., have each received about \$740,000 in political spending.

Since the 2016 election, Trump businesses have become popular gathering spots for Republican candidates, business groups, administration officials and Trump's friends and family to mingle and hold political fundraisers and parties as well as farewell events for departing White House staffers. "It's our little Trump safe space," one Trump fan told the Washington Post.

However, Trump's collection of businesses and properties around the world presents a unique ethical minefield, one exacerbated by Trump's refusal to sell his properties before taking office. Although Trump turned over control of his businesses to his sons Don Jr. and Eric at the start of his administration, he still controls the trust that owns the properties and can withdraw money whenever he likes. Ivanka Trump, who works in her father's White House, has made nearly \$8 million from her stake in the Trump International Hotel in Washington, D.C., according to disclosure forms for 2017 and 2018.

Trump has done little to address this ethics quagmire. In reaction to concerns about conflicts of interest, Trump attorney Sheri Dillon <u>claimed</u> that Trump "wants to do more than what the Constitution requires" to dispel conflict of interest concerns and said that Trump would donate "all profits from foreign government payments made to his hotel" to the U.S. Treasury.

So far, the Trump Organization has donated about \$343,000 in payments of \$151,470 in March 2018 and \$191,538 in February 2019. However, despite public criticism, the administration has provided no explanation of how it is identifying payments at Trump properties. Additionally, the Trump Organization's methodology does not appear to require any donation of foreign government revenue from money-losing properties or account for foreign governments that could be intentionally paying above the standard market rate. The potential for corrupt transactions is significant: U.S. House investigators are examining whether groups, including one foreign government, have booked rooms at Trump properties without using them, according to Politico.

The Trump International Hotel in Washington, D.C., is especially problematic, as it is located in the Old Post Office, a historic building leased from the U.S. government. Trump is clearly violating the lease's terms, which states plainly that no elected U.S. official "shall be admitted to any share or part of this Lease, or to any benefit that may arise therefrom." But the federal agency in charge of the lease, the General Services Administration, has failed to enforce this lease provision, a commonsense anti-corruption measure and standard language in federal lease contracts.

Quite understandably, the framers of the Constitution were concerned about the ability of wealthy foreign governments to curry favor with public officials with lavish payments and gifts and placed an anti-corruption provision in the U.S. Constitution. Known as the foreign emoluments clause, it bars all federal officials from receiving "any present, Emolument, Office, or Title, of any kind whatever, from any King, Prince, or foreign State" without the consent of Congress.

Unlike Trump, America's leaders in the past have taken this constitutional protection seriously. As the first U.S. ambassador to France, Benjamin Franklin <u>received congressional approval</u> to keep a diamond-studded snuff box from King Louis XVI. President Andrew Jackson <u>was denied permission</u> from Congress to accept a gold trinket from Colombian President Simon Bolivar. Congress required President Abraham Lincoln to give to the Interior Department a sword and two elephant tusks <u>sent</u> to him by the king of modern-day Thailand. While first lady Jackie Kennedy <u>kept a horse given</u> by the president of Pakistan, presidents typically have turned over gifts <u>to the National Archives.</u>

By contrast, Trump has displayed no apparent interest in complying with anti-corruption protections or ethical norms, as evidenced by the Trump administration's short-lived <u>decision</u> to hold the G-7 summit of international leaders at the <u>money-losing Trump Doral golf resort</u> in Florida. This decision was quickly reversed under pressure from Republicans. But Trump <u>blamed reporters</u> for the scrutiny over what he <u>termed</u> "this phony Emoluments Clause." In response, several U.S. Senate Democrats <u>introduced</u> the "Scrutinizing White House Activities that Make Profits (SWAMP) Act," which would bar taxpayer dollars from being used to host meetings with heads of state at Trump properties, or any properties owned by a president.

Even Trump's allies seem to acknowledge that he has trouble understanding the distinction between the public interest and private profit. "He talks up his properties every chance he gets with anyone — with staff, with members of Congress, with the press, with the public, with foreign leaders, with anyone," a former White House official told Politico. "He's been a salesman. He's been a PR person for his properties for the last 50 years, so almost out of force of habit, that's what he does."

In the same vein, the acting White House chief of staff, Mick Mulvaney, told Fox News that "At the end of the day, you know, he still considers himself to be in the hospitality business and he saw an opportunity to take the biggest leaders from around the world, and he wanted to put the absolute best show, the best visit that he possibly could."

In an April 2018, <u>event</u> with Japanese Prime Minister Shinzo Abe at Trump's Mar-A-Lago resort in Florida, Trump remarked: "Many of the world's great leaders request to come to Mar-A-Lago and Palm Beach. They like it; I like it. We're comfortable. We have great relationships."

Many foreign leaders know that flattery is the way to get in Trump's good graces, as was evidenced in the <u>rough transcript</u> of Ukrainian President Volodymyr Zelensky's July 2019 conversation with Trump. Zelensky noted that on a previous trip to the U.S. he stayed at the Trump International Hotel and Tower near Central Park in New York City.

(S/NF) President Zelenskyy: I would like to tell you that I also have quite a few Ukrainian friends that live in the United States. Actually last time I traveled to the United States, I stayed in New York near Central Park and I stayed at the Trump



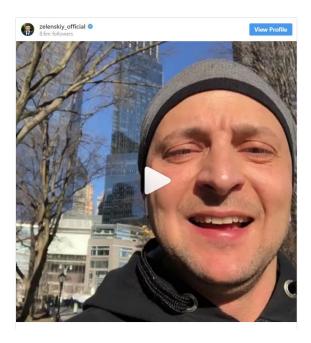
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Tower. I will talk to them and I hope to see them again in the

Source: White House rough transcript.

Mother Jones even <u>spotted</u> a 2018 Instagram video posted by Zelensky, then a television celebrity, taking a jog with the Trump hotel in the background.



Source: Instagram post spotted by Mother Jones

In another Ukraine connection, Kurt Volker, the former U.S. special envoy to Ukraine had breakfast with a key Zelensky aide, Andriy Yermiak, at the Trump International Hotel in D.C., according to an October 2019 deposition of Volker <u>released</u> by a U.S. House committee.

3	Q	Where did you have breakfast?
4	Α	At the Trump Hotel.
5	Q	Why did you have breakfast at the Trump Hotel?
6	Α	Because I was guessing that's where Rudy was going
7	to be sta	ying, so that would be the easiest thing to do.
8	Q	When you met with Andriy Yermak when he was in
9	D.C., whe	re did he stay?
10	Α	I believe he stayed at the Trump Hotel.
11	Q	Do you know why he stayed at the Trump Hotel?
12	Α	I don't know why.
13	Q	Did you ever have any conversations with the
14	Ukrainiar	ns about currying favor with President Trump by
15	staying a	at their property?
16	Α	I did not, no.

Source: U.S. House investigators' interview with Kurt Volker

Many recent events at Trump properties have been politically difficult for the White House. Outrage followed after a <u>video</u> shown at the Trump Doral resort near Miami depicted a fake Trump shooting members of the media and political opponents. Trump's D.C. hotel <u>canceled</u> a Christian group's "Night of Prayer for the Kurds" event after Trump pulled troops out of northern Syria, allowing Turkish troops to enter and causing Kurds to flee. Trump's company <u>canceled</u> a November dinner gala at Mar-A-Lago by ACT for America, a group considered an anti-Muslim hate group by the Southern Poverty Law Center and Anti-Defamation League, after Florida newspapers reported on the \$1,500-per-ticket planned event. Brigitte Gabriel, the group's founder, had <u>previously</u> made several <u>appearances</u> at Trump properties. Another group, the Center for Security Policy, which has been criticized for promoting anti-Muslim views, has <u>scheduled</u> a November 2019 dinner at Mar-A-Lago.

International Use of Trump Businesses

After Trump's election, foreign government officials were quick to figure out that Trump would be susceptible to flattery about his properties. On April 6, 2017, Georgia's ambassador to the U.S., Kaha Imnadze, tweeted from the Trump International Hotel's lobby. Whether Imnadze was staying at the hotel, visiting for lunch or just checking out the hotel's cavernous nine-story atrium was unclear, but Imnadze let the world know that he liked what he saw:



Source: Ambassador Kaha Imnadze's Twitter account.

Many foreign government officials and business executives have been photographed at the hotel and have shared those pictures on social media. Some may have been staying at the D.C. hotel, while others may have simply dropped in for a drink or a meal, perhaps hoping for a brush with members of Trump's inner circle. For example, a Nigerian dignitary, <u>Dr. Christian Nwachukwu</u>, <u>appeared on Instagram</u> smiling next to White House Press Secretary Sean Spicer.



Source: Instagram post by Nigerian-American Sylvester Okere

Italian Deputy Foreign Affairs Minister <u>Guglielmo Picchi</u> met with Trump's lawyer, <u>Rudolph Giuliani</u>, at the D.C. hotel, according to an Instagram post from January 2019.



Source: Instagram post by Italian official Guglielmo Picchi

In another Giuliani connection, associates Lev Parnas and Igor Fruman, who have been charged with conspiring to violate a ban on foreign donations to U.S. election campaigns, appear to be frequent customers of Trump's D.C. hotel. The pair, who have pleaded not guilty to the charges, attended an April 2018 dinner for a Trump super PAC at the D.C. hotel, according to the Washington Post. A Reuters reporter photographed Parnas at the Trump hotel in September 2019. The Wall Street Journal reported that the two had lunch with Giuliani at the D.C. hotel on the same day they were arrested in October 2019. The pair have pleaded not guilty. Additionally, Parnas, Giuliani and former U.S. envoy to Ukraine, Kurt Volker, met at the Trump hotel in July 2019, according to a deposition transcript released by House investigators.

The prime minister of Republika Srpska, the autonomous Serb republic in Bosnia and Herzegovina, Zeljka Cvijanovic, attended a book party for Trump friend Jeanine Pirro in the Trump hotel on July 25, 2018. In a press release posted on the Republika Srpska website, Cvijanovic highlighted her meetings with Trump luminaries such as Kellyanne Conway, Sarah Huckabee Sanders and Corey Lewandowski.



Source: Government of Republika Srpska

Yair Netanyahu, son of Israeli Prime Minister Benjamin Netanyahu, <u>appeared at a gala</u> honoring Sen. Rand Paul (R-Ky). Eduardo Bolsonaro, son of Brazilian President Jair Bolsonaro, who has been nominated to be Brazil's ambassador to the U.S., <u>attended a documentary screening</u> with former White House aide Steve Bannon. Others spotted at D.C. hotel include former Canadian parliament member <u>Tony Clement</u>, Ontario premier <u>Doug Ford</u> with Canadian ambassador Kelly Craft, Egyptian member of parliament <u>Dalia Youssef</u> and <u>Wonjin Cho</u>, the leader a South Korean conservative political party.

Many countries have gone further, not merely showing up at Trump properties for a drink but hosting formal events, dinners and celebrations at the D.C. hotel and other locations. Some examples:

BAHRAIN: On December 7, 2016, a month after Trump's election, Bahrain held its 45th national day celebration at the D.C. hotel. "On the occasion of the forty fifth national day of the Kingdom of Bahrain and the seventeenth anniversary of his majesty King Hamad bin Isa Al Khalifa's accession to the throne, Ambassador Abdulla Al Khalifa cordially invites you to a national day reception," the invitation read.

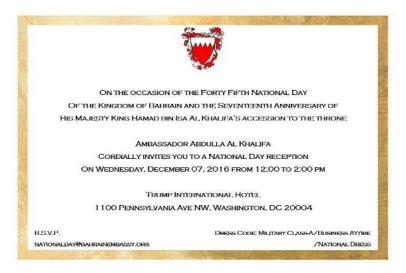


Image posted by Think Progress.

AZERBAIJAN: The Azeri <u>embassy</u> held a Chanukah party at the D.C. hotel along with the Conference of Presidents of Major American Jewish Organizations on December 14, 2016, a move that was <u>controversial</u> among some U.S. Jewish groups. "This decision is tone deaf at best, naked sycophancy at worst," Rabbi Rick Jacobs, president of the Union for Reform Judaism, <u>told Haaretz</u>, an Israeli newspaper: "It would have been far preferable to choose one of the approximately 3,000 other possible locations in downtown Washington."

JAPAN: Shinzo Abe, the Japanese prime minister, has been a frequent patron of Trump properties. In February 2017, Trump <u>traveled</u> to Mar-A-Lago to meet with Abe and <u>golfed</u> on a Trump-owned golf course. White House aides <u>said at the time</u> that Trump would pay for the lodging of the prime minister and his wife as a gift. Trump and his wife Melania <u>dined</u> with Abe, his wife and Robert Kraft, owner of the New England Patriots. On April 17, 2018, Abe again <u>visited</u> Mar-A-Lago. A year later, on April 27, 2019, Abe and Trump <u>played golf</u> at Trump's golf course in Virginia.

KUWAIT: In February 2017, after Trump's election, Kuwait moved its annual independence celebration to Trump's D.C. hotel. In previous years, the event had been held at the Four Seasons in Washington, D.C., and then at the Newseum. According to cost estimates viewed by Reuters, such events cost up to \$60,000. The Kuwaiti ambassador to the U.S, Salem al-Sabah, denied there was any pressure to use the Trump hotel. "We were not under any pressure. Nobody contacted us whatsoever," he told Politico. "I just thought 'It's a new venue, it's been in the news. [...] The novelty of the venue would encourage people' — that was first on my mind." A year later, the Kuwait Embassy returned to the Trump hotel to hold the same event. The embassy then held the event at the Trump hotel for a third time in February 2019, posting on its website pictures of Secretary of Commerce Wilbur Ross, Secretary of Housing and Urban Development Ben Carson and presidential counselor Kellyanne Conway.

Kuwait Embassy in Washington marks nat'l celebrations

Kuwait News Agency (KUNA), Wed, Feb 27, 2019

WASHINGTON, Feb 27 (KUNA) -- The Kuwaiti Embassy in Washington DC held Tuesday evening a reception at the Trump International Hotel to mark the country's 58th National Day and 28th Liberation Day.

The reception was attended by top senior officials, including Secretary of Commerce Wilbur Ross, Secretary of Housing and Urban Development Ben Carson, Administrator of the United States Environmental Protection Agency Andrew R. Wheeler and Counselor to the President Kellyanne Conway.

Kuwait Ambassador to the US Sheikh Salem Abdullah Al-Jaber Al-Sabah congratulated His Highness the Amir Sheikh Sabah Al-Ahmad Al-Jaber Al-Sabah and His Highness the Crown Prince Sheikh Nawaf Al-Ahmad Al-Jaber Al-Sabah, as well as the government and people of Kuwait on the national occasions. (end)

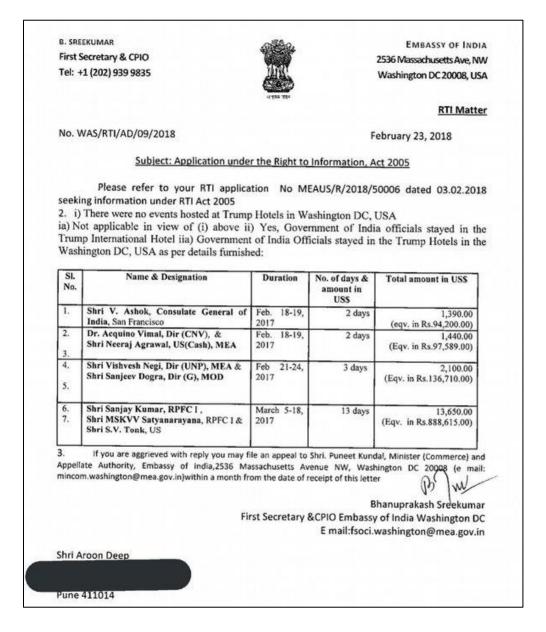


Source: Embassy of the State of Kuwait in Washington website.

TURKEY: On May 21, 2017, the American-Turkish Council and the Turkey-U.S. Business Council <u>held the 36th Annual Conference on U.S.-Turkey Relations</u> at the Trump International Hotel in Washington D.C. The conference <u>previously was held</u> at the Ritz Carlton Hotel in D.C. The guest list included Turkish military

officials and the Turkish undersecretary for defense industries. Other attendees, according to DefenceTurkey.com, <u>included</u> "CEOs, entrepreneurs, investors, members of the U.S. Congress and Turkish Parliament, as well as other ministers and cabinet secretaries." On April 14, 2019, the same groups held the 37th <u>annual event</u>, also at the D.C. hotel. Guests <u>included</u> the Turkish ministers of trade, treasury and finance and defense, as well as a senior adviser to Turkish president Recep Tayyip Erdogan.

INDIA: Indian diplomats spent \$18,650 for 20 nights at the Trump International Hotel in Washington, D.C., during February and March 2017, according to a <u>document</u> obtained by Indian journalist Aroon Deep via a public-records request. Trump, whose company is <u>pursuing</u> several <u>real estate projects</u> in India, has maintained a close relationship with Indian Prime Minister Narendra Modi, <u>appearing</u> with Modi at a rally in September 2019, and has worked to court Indian-American votes.



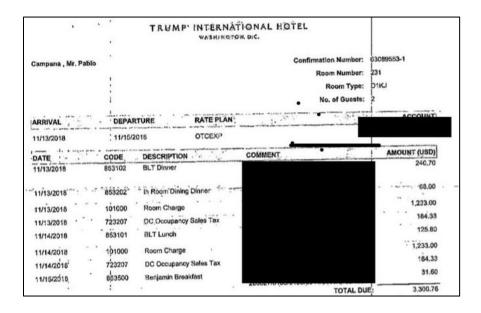
Source: Document posted on Twitter by Indian journalist Aroon Deep

MALAYSIA: Prime Minister Najib Razak of Malaysia <u>visited</u> the Trump International Hotel in D.C., on September 11, 2017, the night before he met with Trump at the White House. A White House spokeswoman declined to say whether Razak had stayed at the hotel, but he was <u>spotted there</u> at 10:30 p.m. The Washington Post reported that delegation members gathered "in meeting rooms with name cards bearing the Malaysian coat of arms."

CYPRUS/GREECE: On May 22, 2018, Greek and Cypriot officials <u>appeared</u> at the 34th annual <u>PSEKA Cyprus Conference</u> held at the Trump International Hotel in D.C. According to GreekNews, a Greek-American newspaper, the guests included two mayors "of the occupied municipalities of Karavas and Lefkoniko" and a Greek member of parliament. The event's <u>goal</u>, <u>per a press release</u>, was to "avert the Islamization of the Turkish occupied part of Cyprus." Turkey considers the northern third of Cyprus a sovereign state that it backs with military and economic support, while the United Nations considers it a Turkish-occupied region.

PHILIPPINES: On June 12, 2018, Philippine Ambassador Jose Manuel "Babe" del Gallego Romualdez held to celebrate the 120th anniversary of his country's independence. In a Philippine newspaper, Romualdez wrote that the event "may have some political undertones because it is associated with the US president, but since several other embassies have also held their national day celebrations at the Trump hotel which were well attended – I decided – why not do it there, too. ... I felt that an elegant and historic venue like the Trump hotel, which was originally the Old Post Office building along Pennsylvania Avenue, would be perfect for the occasion." Trump has boasted of his "great relationship" with Rodrigo Duterte, the country's president, and has expressed admiration for the Duterte government's extrajudicial executions of drug dealers.

ECUADOR: While on a <u>trade visit to Washington, D.C.</u> in November 2018 for the first time in nine years, Pablo Campana Sáenz., Ecuador's foreign trade minister racked up more than \$3,000 in bills at the D.C. hotel including two nights lodging at \$1,200 per night, and several meals, according to a bill <u>posted online</u> by Washington Post reporter David Farenthold.



Source: Bill posted online by Washington Post reporter David Farenthold

ROMANIA: The country's president, Klaus Iohannis, was <u>spotted</u> eating croissants in the lounge of the Trump International Hotel in D.C. in June 2017, according to the Washington Post. In November 2018, the Romanian consulate <u>held</u> its annual Great Union Day celebration at the Trump International Hotel in Chicago. The event was previously <u>held</u> in the Chicago Cultural Center. On March 22, 2019, Romanian President Victoria Dancila was <u>spotted leaving dinner</u> at the Trump International Hotel in D.C. Dancila was in Washington to attend the American Israel Public Affairs Committee's annual conference.

Receptie organizata de Consulatul General al Romaniei la AA Chicago, la Trump Tower International, cu ocazia Centenarului Marii Uniri

Consulatul General al Romaniei la Chicago a organizat receptia dedicată Centenarului Marii Uniri, joi, 29 noiembrie 2018, la **Trump International Hotel and Tower Chicago.**

Evenimentul s-a bucurat de prezenta a peste 300 de invitaţi (Corp Diplomatic, oficialităţi ale statului Illinois, personalităţi ale mediului academic şi cultural, oameni de afaceri, clerici şi reprezentanţi ai comunităţii româneşti).

Structura evenimentului a constat într-o alocuţiune a Consulului General urmată de un program artistic şi o recepţie oficială.

Au fost adresate mesaje de felicitare şi mulţumire din partea guvernatorului statului Illinois, Bruce Rauner, primarului oraşului Chicago, Rahm Emanuel (fost şef al Administraţiei Prezidenţiale Obama) şi al procurorului general al statului Illinois, Lisa Madigan.

În ceea ce priveşte programul cultural-artistic, acesta a reunit artisti de excepţie şi s-a distins prin diversitatea pieselor muzicale clasice şi de muzică uşoară, cu repertorii din compozitori români şi străini.

Source: Press release <u>posted on the Consulate General of Romania's website</u>, spotted by Citizens for Responsibility and Ethics in Washington

IRELAND: On June 6. 2019, Trump had <u>dinner</u> at Trump International Golf Links and Hotel in Doonbeg, Ireland, with Irish <u>ambassador</u> to the U.S. Dan Mulhall, Irish Senator Mark Daly and Irish special envoy to Washington John Deasy.

SAUDI ARABIA: Starting in December 2016, lobbyists for the Saudi government over the course of three months spent \$270,000 on about 500 nights worth of rooms at the D.C. hotel including \$190,000 for lodging and \$78,000 for catering. Lobbyists for Saudi Arabia paid for these hotel rooms as part of a campaign to bring U.S. military veterans to Washington to lobby against legislation opposed by the Saudis.

Lobbying and communications firm Qorvis/MSL Group employed the lobbyists to represent Saudi interests, recruiting six groups of veterans to lobby against the Justice Against Sponsors of Terrorism Act. The bill would make it possible for families of victims of the 9/11 terrorist attacks to sue the Saudi government (most of the attackers were Saudi citizens). The veterans were told that the bill could lead to foreign governments retaliating by prosecuting veterans for their military actions while stationed overseas.

Some veterans <u>expressed concerns</u> to the Washington Post, worrying they were used to deliver the Saudi message to Congress and provide business to the Trump Organization. Jason Johns, the Wisconsin veterans advocate who worked as a contractor to fly veterans to D.C. for the campaign, <u>told a Wisconsin newspaper</u>

that veterans were informed that their trip was paid for by Saudis and that that there was nothing wrong with the effort. "The undertone here is that Qorvis purchased all of the hotel rooms at the Trump Hotel in order to curry 'favor' and/or 'influence' with President Trump as he was coming in to office," Johns said. "I could understand all of this if after our fly-ins and staying at (the) Trump Hotel that all of a sudden he was out publicly calling for repeal of JASTA, but he didn't."

	Attachment to Supp	is, Inc. d/b/a Qorvis MSLGROUP demental Statement for Period: 2016 – March 31, 2017	•
11 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	Tortilla Coast Restaurant	Catering Charges	1,658.43
	Trump Intl. Hotel	Lödging	190,272.87
	Trump Intl. Hotel	Catering Charges	78,204.02
	Trump Intl. Hotel	Parking	1,568.00
	USPS	Miscellaneous Expenses	119.00
	Vermilion Restaurant	Meal Reimbursement	76.10
	W C1C:	The state of the s	40.00

Source: Department of Justice Foreign Agents Registration Act database.

As bookings declined at Trump's New York City hotel, a visit by the Saudi Crown Prince Mohammad bin Salman, whose entourage was partly put up in Trump's hotel, was credited by the hotel's manager with helping the hotel <u>turn a profit</u> during the first three months of 2018. In the Chicago hotel, an <u>increase in Saudi customers</u> from 81 in 2016 to 218 in the first half of 2018 also significantly boosted business, though profits have been <u>sinking</u> at the Chicago property.

PAKISTAN: Pakistan's minister of maritime affairs, <u>Ali Haider Zaidi</u>, attended meetings at the D.C. hotel in June 2019, in conjunction with a White House visit by Pakistani Prime Minister Imran Khan. The visit was <u>promoted</u> on social media accounts associated with Imran Khan Developmental Academic Research (IKDAR), a nonprofit <u>founded by Khan</u>. "By Trumpian standards, where his White House lives in the constant transactional present, this was a good set of meetings," said Sherry Rehman, a Pakistani politician and former ambassador to the U.S. Weeks later, in September 2019, the governor of the Sindh province in Pakistan visited the Trump International Hotel on a visit to D.C., according to a <u>tweet</u> by a journalist who interviewed the governor, Imran Ismail. While in D.C., <u>Ismail and business leaders</u> met with <u>the State Department</u> and <u>Sen. Chris Van Hollen</u> (D-Md.) and <u>Rep. Eric Swalwell</u> (D-Calif.) to discuss human rights issues in Kashmir as well as international trade issues.



Source: Instagram post spotted by journalist Zach Everson.

Political Use of Trump's Businesses

Before Trump's entrance onto the political stage, political candidates rarely spent campaign money at Trump-owned businesses. That changed in 2015 with Trump's candidacy, when he made ample use of his own properties and businesses for his campaign. The Trump campaign paid more than \$9 million to a Trump-owned company for the campaign's air travel and used the Trump Tower in New York <u>as a campaign headquarters</u>.

The Trump campaign <u>plane</u>, customized with gold-plated bathroom faucets, is owned by a Trump-controlled company, <u>DIT Operations I LLC</u> but leased to another Trump company, Tag Air Inc., according to a 2016 <u>story</u> in the Wall Street Journal, which said this strategy is typically employed by jet owners to avoid paying upfront sales taxes on lease payments. The Trump campaign was also <u>reimbursed</u> by the federal government for the costs of transporting Secret Service agents.

\$12,000,000 \$11,091,419 \$10,000,000 \$8,000,000 \$6,000,000 \$4,000,000 \$3,211,818 \$2,554,614 \$1,612,502 \$2,000,000 \$1,202,476 \$34,006 \$5,241 \$29,586 \$-2012 2013 2014 2015 2016 2017 2018 2019 ytd

Chart 1: Political Spending at Trump Businesses Since 2012

Source: Public Citizen analysis of Federal Election Commission data as of Oct 31, 2019

Public Citizen's research found about \$8.3 million in disclosed U.S. political spending at Trump businesses since the 2016 election, with 45 percent, or about \$3.8 million, coming from Trump's own campaign. The second-largest spender was the Republican National Committee, at \$1.6 million, followed by three groups supporting Trump and Vice President Mike Pence: Trump Victory (\$991,000), America First Action (\$545,000) and the Great America Committee (\$238,000).

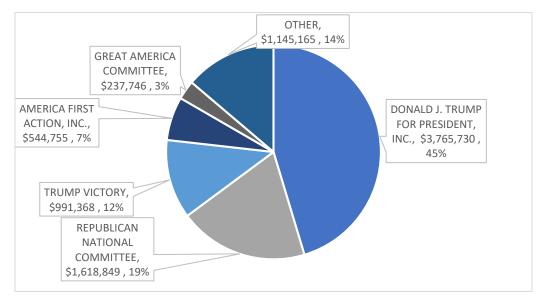


Chart 2: Top 5 U.S. Political Spenders at Trump Businesses Since 2016 Election

Source: Public Citizen analysis of Federal Election Commission data as of Oct 31, 2019

Several members of Congress and affiliated political groups are also big spenders at Trump properties. They include two fundraising committees benefiting Republican Party candidates and House Minority Leader Kevin McCarthy (R-Calif.); the campaign of Rep. Greg Pence (R-Ind.), older brother of Vice President Mike Pence, who was elected to Congress in 2018; a group benefiting Republican House candidates Rep. Carol Miller (R-W.Va.), Rep. Ross Spano (R.-Fla.) and unsuccessful candidate Jay Webber of New Jersey, which spent nearly \$40,000 for an October 2018 fundraiser hosted by Trump at the Trump International Hotel in D.C. Other political campaigns that have been significant spenders at Trump properties include those of: Sen. Tom Cotton (R-Ark.), former Rep. Bill Shuster (R-Pa.); Rep. Jim Jordan (R-Ohio), Rep. Roger Williams (R-Texas); Rep. Jodey Arrington (R-Texas), former Rep. Tom MacArthur (R-N.J.) and Omar Navarro, a Republican candidate for Congress from Los Angeles.

Republican candidates for Congress have ample reason to spend money at Trump properties. As documented by reporter Zach Everson, Trump has tended to <u>tweet out</u> valuable endorsements of Republican candidates after they hold events at his properties.

Public Citizen's tally of Federal Election Commission disclosures found that the D.C. hotel was the top recipient of political spending among Trump businesses, receiving nearly \$2.5 million in political revenue since the election. In addition, political campaigns and political groups spent nearly \$191,000 at the BLT Prime restaurant in the D.C. hotel. Political spending totaled about \$744,000 at Trump's Mar-A-Lago Club in Palm Beach, Fla., and about \$736,000 at Trump National Doral.

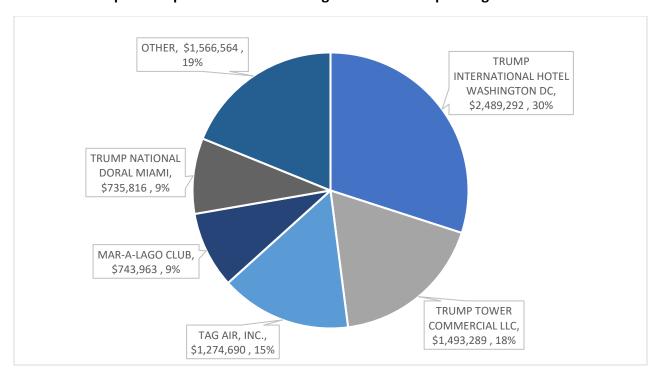


Chart 3: Top 5 Trump Businesses Benefiting From Political Spending Since 2016 Election

Source: Public Citizen analysis of Federal Election Commission data as of Oct 31, 2019

Trump's own campaign operation has spent nearly \$3.8 million at Trump businesses since the 2016 election, including nearly \$1.5 million on rent at Trump Tower in New York for the 2020 campaign, even though only a handful of campaign staffers work at the Manhattan condominium and office tower, The Huffington Post reported. Trump's flagship Trump Tower in New York has faced considerable <a href="https://discrete.com/discrete.com/handful.com/h

Corporate Use of Trump Businesses

Business groups holding events at Trump Organization properties include the Institute of International Bankers, which heldits2018 annual conference at the Trump International Hotel in Washington, D.C.. Those attending the March 2018 event included the chairman of the U.S. Commodity Futures Trading Commission and a top U.S. Treasury Department official who promised that a major regulatory rollback sought by banks would be "commencing shortly."

The Community Financial Services Association, which represents high-rate payday lenders, has twice (in 2018 and 2019) held its annual conference at the Trump National Doral golf club near Miami, drawing protests outside the club's gates. Payday lenders are benefiting from regulatory rollbacks under Trump, and one lender recently bragged about his access to the chair of the Republican Party. Other corporate events include the Seasonal Employment Alliance, which represents businesses that use overseas guest workers, and the National Mining Association, which held a board of directors meeting featuring Energy Secretary Rick Perry in October 2017. Perry himself tweeted about the event:



Source: Energy Secretary Rick Perry's Twitter account.

Working to secure regulatory approvals for its <u>merger</u> with Sprint, T-Mobile CEO <u>John Legere</u> and other company executives spent \$195,000 at the D.C. hotel including hotel rooms, meeting space, catering and other costs. Legere, who was <u>spotted</u> in the hotel with former Trump campaign manager and T-Mobile <u>adviser</u> Corey Lewandoswki, previously trashed Trump in Twitter posts, but <u>stopped doing</u> so after his company's merger announcement.

T-Mobile executives paid for a combined 52 nights at the hotel, according to reporting by The Washington Post. In a letter to Sen. Elizabeth Warren (D-Mass.) and Rep. Pramila Jayapal (D-Wash.), T-Mobile said the hotel stays represented about 14 percent of the \$1.4 million in spending by T-Mobile in Washington, D.C., from April 2018 to February 2019. In response, Legere wrote that "the Trump hotel is located close by my company office located at 601 Pennsylvania Avenue and the Department of Justice." Under Trump-appointed leaders, the Department of Justice and Federal Communications Commission have both approved the merger.

Sandi McGuire is with Grace Hishgun and Ben Lim at Q Trump **



Source: Social media <u>posts</u> spotted by Zach Everson



Source: T-Mobile CEO John Legere's Twitter <u>feed</u>.

Watergen USA, an Israeli water company, met with Trump at his Mar-A-Lago Club in Florida in March 2018, as the U.S. Environmental Protection Agency was <u>signing</u> a research agreement with the company, which extracts water from air in the atmosphere. The Wall Street Journal and other outlets <u>reported</u> that Watergen was connected to former EPA Administrator Scott Pruitt at the <u>request</u> of a major Trump donor, casino magnate Sheldon Adelson. In another Trump connection, lawyer and television pundit Alan Dershowitz, a Trump friend, <u>sits on Watergen's board</u>.



Source: Watergen Facebook post.

Other business groups gathering at Trump properties include the <u>Options Industry Conference</u>, a financial industry event at the Trump National Doral resort, featuring former Florida Gov. Jeb Bush and former White House Communications Director Anthony Scaramucci. Trump's D.C. hotel hosted a <u>firearms import/export conference</u>, as the Trump administration <u>eased restrictions</u> on international gun exports.

State and Local Use of Trump Businesses

Another important ethics <u>provision</u> of the U.S. Constitution, the domestic emoluments clause, bars presidents from receiving payments from state governments or the federal government besides the president's salary.

While many state-level officials have avoided controversial visits to Trump properties, others have not For example, former Maine Gov. Paul LePage, a Republican and Trump ally, and his staff spent about \$22,000 in taxpayer funds on more than 40 rooms at the Trump International Hotel in Washington D.C., according to reporting by the Portland Press-Herald. The newspaper reported that the LePage administration paid between \$362 per night to more than \$1,100 a night for rooms during trips to meet with Trump or his inner circle.

A Maine official flagged the expenses, writing in June 2017 that the "room cost is WAY more than the allowed amount." The newspaper reported that Maine taxpayers <u>paid for</u> "a \$53 filet mignon, a \$57 surf & turf, a \$55 New York strip steak and a \$45 veal chop plus side dishes (at \$13 each)" at the BLT Prime restaurant in Trump's D.C. hotel. Documents detailing LePage's travel expenses, sought through a public-records request, were released to the newspaper after LePage left office. In a radio interview, LePage <u>said</u> he wasn't aware of the sizable room charge, saying, "If we paid \$1,100 for a hotel room in one night, shame on me, because I wasn't aware of it."

In December 2017, the University of Wisconsin football team and alumni groups <u>stayed at</u> the Trump National Doral resort. The team was playing in the Orange Bowl at the time. According to the Washington Post, the University of Wisconsin-Madison <u>sent</u> 220 students and staff for seven nights to the resort, including players, trainers, staff, administrators and members of the university's board of regents. The resort was <u>selected</u> by the Orange Bowl committee before Trump ran for president.

Other state and local political figures who have used Trump's properties include Louisiana Attorney General Jeff Landry, who has <u>held two fundraisers</u> at Trump's D.C. hotel. Additionally, Republican election lawyer Michael Adams, <u>who was elected</u> secretary of state in Kentucky in in fall 2019, had a <u>fundraiser</u> in the D.C. hotel attended by Pence, Sen. Rand Paul (R-Ky.) and Transportation Secretary Elaine Chao.

Solutions

The Trump presidency has exposed big holes in the system of conflict-of-interest rules and norms governing the White House and the rest of the executive branch. An October 2018 report <u>published</u> by Public Citizen and Citizens for Responsibility and Ethics in Washington outlines a host of policy reforms to ensure that future presidents can't repeat the Trump-era abuses. The report recommends changes including:

• Requiring the president and vice president to divest assets that pose a risk of conflict of interest within 30 days of the presidential inauguration.

- Giving enforcement authority to the U.S. Office of Government Ethics or an inspector general's office to investigate potential ethics violations in the White House and executive branch.
- Requiring candidates for president and vice president to disclose their tax returns before their election and in subsequent years after holding office.
- Requiring candidates and officials to disclose the value of their assets, income, transactions and liabilities as well as details of any privately held businesses.

Trump has pushed ethical boundaries past their breaking point, showing utter disregard for the norms of our government and a total lack of concern about corruption. We now know how to strengthen the system against future presidents who lack an ethical compass. We must enact firm rules to ensure these egregious ethical abuses can never happen again.

Appendix: Tables

Table 1: Political Campaigns/Groups Spending at Trump Businesses

Name	2016 Post-	2017	2018	2019	Grand Total
	Election				
DONALD J. TRUMP FOR	\$2,120,512	\$764,994	\$588,748	\$291,476	\$3,765,730
PRESIDENT, INC.					
REPUBLICAN NATIONAL	\$127,809	\$221,090	\$1,148,010	\$121,939	\$1,618,849
COMMITTEE	¢750	¢2.80¢	¢160.007	¢027.704	¢004.260
TRUMP VICTORY	\$759	\$2,806	\$160,097	\$827,704	\$991,368
AMERICA FIRST ACTION, INC.		\$33,582	\$431,818	\$79,355	\$544,755
GREAT AMERICA COMMITTEE			\$138,183	\$99,563	\$237,746
PROTECT THE HOUSE			\$232,838		\$232,838
NRCC		\$1,608	\$47,726	\$7,500	\$56,834
WOMEN VOTE SMART			\$54,008	\$869	\$54,877
GREG PENCE FOR CONGRESS		\$1,525	\$36,426	\$14,793	\$52,745
MCCARTHY VICTORY FUND		\$37,888		\$5,611	\$43,498
MILLER SPANO WEBBER VICTORY			\$39,952		\$39,952
AMERICAN PRO-ISRAEL PAC			\$38,872		\$38,872
COTTON VICTORY			\$18,910	\$15,670	\$34,580
NRSC		\$404	\$31,386	\$1,960	\$33,751
BILL SHUSTER FOR CONGRESS		\$28,699	\$3,112		\$31,812
JIM JORDAN FOR CONGRESS			\$10,572	\$11,887	\$22,460
NRSC TARGETED STATE VICTORY FUND			\$21,769		\$21,769
DUFFY FOR WISCONSIN		\$782		\$20,779	\$21,561

ROGER WILLIAMS FOR U S CONGRESS COMMITTEE		\$3,286	\$17,466	\$97	\$20,850
OMAR NAVARRO FOR CONGRESS		\$8,422	\$5,977	\$3,878	\$18,277
OTHER	\$27,737	\$97,387	\$185,948	\$109,418	\$420,491
Grand Total	\$2,276,818	\$1,202,476	\$3,211,818	\$1,612,502	\$8,303,613

Table 2: Trump Businesses Receiving Political Spending Since 2016 Election

Name	2016 Post-	2017	2018	2019	Grand Total
	Election				
TRUMP INTERNATIONAL HOTEL WASHINGTON DC	\$143,454	\$456,737	\$1,504,487	\$384,614	\$2,489,292
TRUMP TOWER COMMERCIAL LLC	\$415,418	\$476,371	\$413,791	\$187,708	\$1,493,289
TAG AIR, INC.	\$1,271,944			\$2,746	\$1,274,690
MAR-A-LAGO CLUB	\$3,347		\$371,372	\$369,244	\$743,963
TRUMP NATIONAL DORAL MIAMI	\$13,477	\$3,000	\$634,517	\$84,822	\$735,816
TRUMP TOWER (5th Ave, NY)			\$6,499	\$311,057	\$317,556
BLT PRIME - TRUMP DC	\$11,767	\$36,980	\$78,039	\$77,322	\$204,109
TRUMP INTERNATIONAL HOTEL LAS VEGAS	\$166,922	\$16,416	\$5,970		\$189,308
THE TRUMP CORPORATION (NY)		\$143,976	\$34,339		\$178,315
TRUMP NATIONAL GOLF CLUB - BEDMINSTER, N.J.	\$41,843	\$15,221	\$32,399	\$75,589	\$165,053
TRUMP RESTAURANTS	\$67,018	\$28,136	\$48,595	\$14,432	\$158,181
TRUMP PLAZA - NEW YORK		\$3,850	\$50,050	\$23,100	\$77,000
THE TRUMP CORPORATION			\$4,759.00	\$57,573	\$62,332
TRUMP INTL' GOLF CLUB WEST PALM BEACH	\$58,993				\$58,993
TRUMP INTERNATIONAL HOTEL AND TOWER CHICAGO	\$21,844	\$5,922	\$11,269	\$10,901	\$49,937
TRUMP NATIONAL GOLF CLUB - JUPITER FL	\$24,147				\$24,147
TRUMP INT'L HOTEL AND TOWER (CENTRAL PARK WEST)	\$11,127	\$1,937	\$2,518	\$1,565	\$17,147
TRUMP SOHO NEW YORK	\$9,305	\$1,244.69			\$10,550
TRUMP HOTELS			\$4,948	\$4,998	\$9,945
TRUMP NATIONAL GOLF CLUB LOS ANGELES		\$7,804			\$7,804

Name	2016 Post- Election	2017	2018	2019	Grand Total
OTHER	\$16,211	\$4,880	\$8,265	\$6,832	\$36,187
Grand Total	\$2,276,818	\$1,202,476	\$3,211,818	\$1,612,502	\$8,303,613

Table 3: Foreign Government Events/Hotel Stays at Trump Properties After 2016 Election

Name	Description of Visitor	Property	Event/Spending	Start date of
			Description	event
Saudi Arabia	Saudi government	Trump International Hotel Washington DC	Lobbying Trip	12/1/16
Bahrain	Bahrain embassy	Trump International Hotel Washington DC	45th National Day	12/7/16
Azerbaijan	Azeri embassy	Trump International Hotel Washington DC	Chanukah party with U.S. Jewish group	12/14/16
Turkey	Turkish foreign minister Mevlüt Çavuşoğlu, other foreign officials	Trump International Hotel Washington DC	Breakfast event with National Security Adviser Mike Flynn	1/18/17
Qatar	Qatari officials	Trump International Hotel Washington DC	Breakfast event with National Security Adviser Mike Flynn	1/18/17
Romania	Former Romanian prime minister Sorin Grindeanu and now-jailed lawmaker Liviu Dragnea	Trump International Hotel Washington DC	Romanian politicians attend pre-inauguration party at Trump's DC hotel	1/19/17
Japan	Japanese Prime Minister Shinzo Abe	Mar-A-Lago Club	Meeting with Trump	2/11/17
Japan	Japanese Prime Minister Shinzo Abe	Trump National Golf Club Jupiter Fla.	Golf at Trump club	2/11/17
India	Indian gov't officials including Consul General of India, San Francisco	Trump International Hotel Washington DC	\$18,580 spent on lodging at Trump DC hotel February and March 2017	2/18/17
Kuwait	Kuwait Ambassador to the U.S., Salem al-Sabah	Trump International Hotel Washington DC	Kuwait National Day	2/22/17
United Kingdom	Nigel Farage, leader of Brexit Party, member of European Parliament	Trump International Hotel Washington DC	Dinner with Trump	2/25/2017
China	Visit by President Xi Jinping	Mar-A-Lago Club	Meeting with Trump	4/6/17
Malaysia	Malaysian government	Trump International Hotel Washington DC	Prime Minister Najib Razak visit to DC	9/11/17
Belgium	Prince Edouard de Ligne and Princess Isabella de Ligne Orsini	Trump International Beach Resort - Sunny Isles, FL	First Annual Kosher Food Bank Benefit: Heroes of The Holocaust	2/17/2018

Name	Description of Visitor	Property	Event/Spending Description	Start date of event
Saudi Arabia	Saudi defense attaché to the United States, major general Yousef Alharbi	Trump International Hotel Washington DC	Kuwait National Day	2/26/18
Kuwait	Kuwait Ambassador to the U.S., Salem al-Sabah	Trump International Hotel Washington DC	Kuwait National Day	2/26/18
Afghanistan	Afghanistan Minister of Mines Nargis Nehan and Ambassador Roya Rahmani dinner	Trump International Hotel Washington DC	Dinner	3/12/18
Japan	Japanese Prime Minister Shinzo Abe	Mar-A-Lago Club	Meeting with Trump	4/17/18
Japan	Japanese Prime Minister Shinzo Abe	Trump International Golf Club West Palm Beach	Trump and Abe golf at course in West Palm Beach	4/18/18
Cyprus	Gov't officials attend International Coordinating Committee - "Justice for Cyprus"	Trump International Hotel Washington DC	34th Annual Pseka Cyprus Conference	5/22/18
Greece	Gov't officials attend International Coordinating Committee - "Justice for Cyprus"	Trump International Hotel Washington DC	34th Annual Pseka Cyprus Conference	5/22/18
Philippines	Officials including Philippine Ambassador Jose Manuel "Babe" del Gallego Romualdez	Trump International Hotel Washington DC	Reception For 120th Anniversary of Philippine Independence	6/12/18
Ecuador	Ecuador commerce/export minister Pablo Campana Sáenz	Trump International Hotel Washington DC	\$1,200/night stay at Trump hotel on trade visit	11/13/18
Romania	Romanian Consulate	Trump International Hotel and Tower Chicago	National Day Celebration	11/29/18
Nigeria	Former Nigerian Vp Atiku Abubaka, running for president, several Nigerian lawmakers	Trump International Hotel Washington DC	Nigerian presidential candidate (previously banned from U.S.) stays at hotel	1/17/19
Syrian Kurds	Syrian-Kurdish politician Ilham Ahmed, head of Executive Committee of the Syrian Democratic Council	Trump International Hotel Washington DC	Dinner with members of Congress/Trump meeting	1/28/19
Kuwait	Kuwait Ambassador to the U.S., Salem al-Sabah	Trump International Hotel Washington DC	Kuwait National Day	2/26/19
Romania	Romanian Prime Minister Viorica Dancila	Trump International Hotel Washington DC	AIPAC Conference	3/22/19
St Lucia	Prime Minister Allen Michael Chastanet	Mar-A-Lago Club	Meeting with Trump for Caribbean leaders backing Venezuelan opposition leader	3/22/19
Dominican Republic	President Danilo Medina	Mar-A-Lago Club	Meeting with Trump for Caribbean leaders	3/22/19

Name	Description of Visitor	Property	Event/Spending	Start date of
			Description	event
			backing Venezuelan opposition leader	
Jamaica	Prime Minister Andrew Holness	Mar-A-Lago Club	Meeting with Trump for Caribbean leaders backing Venezuelan opposition leader	3/22/19
Haiti	President Jovenel Moise	Mar-A-Lago Club	Meeting with Trump for Caribbean leaders backing Venezuelan opposition leader	3/22/19
Bahamas	Prime Minister Hubert Minnis	Mar-A-Lago Club	Meeting with Trump for Caribbean leaders backing Venezuelan opposition leader	3/22/19
Dominican Republic	Attorney general Jean Alain Rodríguez	Trump International Hotel Washington DC	Three-night stay to meet with federal drug enforcement officials.	4/1/19
Turkey	Turkish treasury and finance minister, other government officials and business executives	Trump International Hotel Washington DC	37th Annual Conference on U.STurkey Relations sponsored by American- Turkish Council	4/14/19
Ukraine	Advisers to Ukraninan president Volodymyr Zelensky	BLT Prime - Trump DC	Meeting with Former Trump adviser Mike Rubino, State Dept official Matt Mowers, per CNBC report	4/16/19
Japan	Japanese Prime Minister Shinzo Abe	Trump National Golf Club Washington DC	Golf at Trump's Virginia golf course	4/27/19
Ireland	Irish Ambassador to U.S and Special Envoy To Washington	Trump Doonbeg, Ireland	Dinner with Trump	6/7/19
Nigeria	Vice President Yemi Osinbajo	Trump International Hotel Washington DC	Stayed at Trump hotel while in DC for meeting with VP Mike Pence	7/2/19
Pakistan	Federal minister for maritime affairs, Ali Haider Zaid	Trump International Hotel Washington DC	Trade and investment meetings at Trump hotel in conjunction with PM Imran Khan visit	7/27/19
Saudi Arabia	Saudi royals	Trump Turnberry, Scotland	Saudi royal party of 25 stayed at the resort for about a week, per Politico.	Summer 2019

Table 4: Foreign Businesses/Business Groups Holding Events at Trump Properties

Name	Description of Visitor	Property	Event/Spending Description	Start date of event
British-American Business Association	U.S./UK Business Group	Trump International Hotel Washington DC	20 th Annual Gala Christmas Luncheon	12/16/16
American Turkish Council/Turkey-U.S. Business Council	Groups promoting business between U.S. and Turkey	Trump International Hotel Washington DC	36th Annual Conference On U.STurkey Relations	5/21/17
Polish American Leadership Summit	Conference on Polish American business ties with Corey Lewandowski, Polish business leaders	Mar-A-Lago Club	Invitation-only session of Polish American Leadership Summit at Mar-A-Lago featuring Jerzy Kwieciński, Polish minister of investment and economic development	2/11/2018
Institute of International Bankers	Trade group of foreign banks	Trump International Hotel Washington DC	Annual Washington Conference	3/4/2018
Artisan Business Group/American Center for The Belt and Road Initiative	China investment forum	Trump International Hotel Washington DC	21St Century Silk Road - "The Belt And Road Initiative" Investment Forum	3/14/18
Afghan-American Chamber of Commerce	Afghan-American Business Group	Trump International Hotel Washington DC	13th Annual Business Matchmaking Conference	4/24/18
FLC Group	Vietnamese real estate developer and startup airline owner	Trump International Hotel Washington DC	Vietnam investment conference	6/25/18
MNC Group	Developer of Trump properties in Indonesia	Trump Residences Indonesia	Promotional tour of two Trump resort properties being built Indonesia	8/13/19
Anambra Business and Investment Roundtable	Group promoting investment in a Nigerian state	Trump International Hotel Washington DC	Nigerian investment event	9/26/19
Christian Dior SE	Luxury goods company	Trump Turnberry, Scotland	conference	10/18/2019

Table 5: State/Local Officials and Political Groups Holding Events at Trump Properties

Name	Description of Visitor	Property	Event/Spending Description	Start date
Maina Ca D	NAsia s sau	Towns lates 22 1	Maria than 40 m	of event
Maine Gov. Paul Lepage and staff	Maine governor	Trump International Hotel Washington DC	More than 40 rooms at the Trump International Hotel	2017-2018
Republican Governors Association	Republican governors including Missouri Gov. Eric Greitens, Florida Gov. Rick Scott, Wisconsin Gov. Scott Walker, Maryland Gov. Larry Hogan	Trump National Doral Miami	Corporate Policy Summit	5/16/17
Virginia Women for Trump	Virginia Trump supporters' group	Trump International Hotel Washington DC	"Tea for Trump" Celebration Of Donald Trump's Birthday Featuring Brigitte Gabriel, Founder Act For America. Carrie Almond, President, National Federation of Republican Women	6/25/17
Republican Attorneys General Association	Group of Republican Attorneys General	Mar-A-Lago Club	Reception Dinner at Mar-A-Lago Club Teahouse	11/10/17
Republican Attorneys General Association	Group of Republican Attorneys General	Trump International Hotel Washington DC	Holiday Party	12/7/17
University of Wisconsin	Football team	Trump National Doral Miami	Lodging	12/23/17
Louisiana Attorney General Jeff Landry	Louisiana Attorney General	Trump International Hotel Washington DC	Fundraiser	1/24/18
Republican Party of Palm Beach County	Palm Beach Republican organization	Mar-A-Lago Club	Palm Beach County GOP Lincoln Day Dinner	3/16/18
Virginia Women for Trump	Virginia Trump supporters' group	Trump International Hotel Washington DC	"Tea for Trump" Celebration Of Donald Trump's Birthday Featuring Brigitte Gabriel, Founder Act For America. Carrie Almond, President, National Federation of Republican Women	6/24/18
Louisiana Attorney General Jeff Landry	Louisiana Attorney General; Mike Pence special guest	Trump International Hotel Washington DC	Fundraiser	1/30/19
DC MAGA	Local pro-Trump organization	Trump International Hotel Washington DC	Social Event	4/9/19
Martin County Republican Party	Local GOP chapter	Trump National Golf Club Jupiter	"Keep America Great" Invitational Golf Tournament	4/29/19

Name	Description of Visitor	Property	Event/Spending Description	Start date of event
DC MAGA	Local pro-Trump organization	Trump International Hotel Washington DC	Social Event	5/14/19
Washington D.C. Conservative Book Club	Discussing <i>The New</i> <i>Left</i> by Ayn Rand	Trump International Hotel Washington DC	Book Club	5/28/19
Virginia Women for Trump	Trump's 3rd Annual Birthday Bash	Trump International Hotel Washington DC	Social Event	6/23/19
Michael Adams, candidate for KY Secy of State	Candidate for Kentucky Secretary of State	Trump International Hotel Washington DC	Fundraiser with VP Mike Pence, Transportation Secretary Elaine Chao, Sen. Rand Paul (R-Ky).	9/17/19
Lincoln Club of Orange County (Calif.)	Southern California conservative group	Trump International Hotel Washington DC	Event with Sen. Rick Scott (R-Fla), radio host Hugh Hewitt, conservative lawmakers	10/22/19

Table 6: Conservative Advocacy Group Events at Trump Properties

Name	Description of Visitor	Property	Event/Spending Description	Start date of event
Young America's Foundation	College conservative group	Trump International Hotel Washington DC	Event with Mike Flynn	11/13/16
Heritage Foundation	Conservative think tank	Trump International Hotel Washington DC	Donor Event	12/6/16
Clare Boothe Luce Policy Institute	Conservative women center	Trump International Hotel Washington DC	2017 Woman Of The Year Dinner Banquet Honoring Kellyanne Conway	6/29/17
Judicial Watch	Conservative legal group	Trump International Hotel Washington DC	Event with former White House official Sebastian Gorka and Judicial Watch President Tom Fitton	9/15/17
Log Cabin Republicans	LGBT conservative group	Trump International Hotel Washington DC	40th Anniversary Celebration	9/23/17
American Spectator	Conservative magazine	Trump International Hotel Washington DC	50th Anniversary Gala	9/26/17
Fund for American Studies	Sponsors educational programs teaching "principles of limited government, free- market economics and honorable leadership"	Trump International Hotel Washington DC	Defending Freedom Luncheon (Featuring Neil Gorsuch)	9/28/17
Network of Enlightened Women	Conservative Group	Trump International Hotel Washington DC	Book club for conservative women's campus group	10/11/17
Sovereign Nations Conference	Far-right group combatting	Trump International Hotel Washington DC	Conference	10/30/17

Name	Description of Visitor	Property	Event/Spending Description	Start date of event
	"Marxist sourced social justice conformity."			
Young Republican National Federation	Organization for Republicans ages 18-40	Mar-A-Lago Club	Event Featuring Roger Stone, Joy Villa	11/12/17
Young Americans for Freedom	College conservatives retreat	Trump International Hotel Washington DC	Retreat	11/13/17
Heritage Foundation	Conservative think tank	Trump International Hotel Washington DC	Annual Meeting	12/6/17
United In Purpose	Conservative Group	Trump International Hotel Washington DC	Luncheon hosted by conservative activist Ginni Thomas (wife of Clarence Thomas) featuring Sean Hannity and James O'Keefe.	12/6/17
Trumpettes Usa	Women's pro- Trump group	Mar-A-Lago Club	Red, White & Blue Celebration	1/18/18
Make California Great Pac	Conservative group	Trump International Hotel Las Vegas	1 Year of Trump Celebration	1/20/18
Heritage Foundation	Dinner for 100 people during Conservative Members Conference	Trump International Hotel Washington DC	Dinner	2/7/18
Foundation for Liberty and American Greatness	Conservative civics education group	Trump International Hotel Washington DC	Gala Featuring Bill O'Reilly	4/21/18
Maga Coalition	Right-Wing Super PAC	Trump International Hotel Washington DC	An Evening with Gov. Sarah Palin	5/10/18
FOX News' Jeanine Pirro	Conservative commentator	Trump International Hotel Washington DC	Book Launch	7/24/18
Sean Spicer	Book launch	Trump International Hotel Washington DC	Book	7/26/18
Maga Summit	Trump supporter event	Trump International Hotel Washington DC	MAGA Activist Event	9/6/18
American Legislative Exchange Council	Conservative group focused on state legislatures	Trump International Hotel Washington DC	45 th Anniversary Gala	9/26/2018
American Spectator	Conservative magazine	Trump International Hotel Washington DC	51St Annual Robert L Bartley Gala	10/2/18
Border Patrol Foundation	Border patrol appreciation	Trump International Hotel Washington DC	Reception	10/16/18
Turning Point USA	Putting conservatives in college student government	Mar-A-Lago Club	Fundraiser/Gala	12/20/18
American Border Foundation	Border wall crowdfunding effort	Trump International Hotel Washington DC	Gathering at Trump Hotel in advance of press event	1/17/19

Name	Description of Visitor	Property	Event/Spending Description	Start date of event
Stork Charity Ball 2019	Save the Storks - pro-life group	Trump International Hotel Washington DC	Ball	1/17/19
Virginia Women for Trump	Virginia pro-Trump group	Trump International Hotel Washington DC	Summit and dinner for 2020 campaign kickoff including Roger Stone; Steve Moore	2/2/19
Our Community Salutes	Military fundraiser	Trump International Hotel Washington DC	Fundraiser/Gala	2/7/19
Diamond and Silk	Diamond and Silk (conservative commentators) "Flip It Red, Keep It Red" Chit Chat Tour	Trump International Hotel Washington DC	Tour	2/23/19
Trumpettes Usa	Celebrating Trump's second year in office	Mar-A-Lago Club	Gala	2/23/19
American Pro-Israel Pac	Conservative PAC in favor of closer ties with Israel	Mar-A-Lago Club	Fundraiser	3/16/19
National Review Institute Fellows Ideas Summit	Conservative policy development	Trump International Hotel Washington DC	Reception	3/29/19
Freedom Works	Small government advocacy group	Trump International Hotel Washington DC	Conference	4/2/19
Family-Pac Federal	Conservative PAC	Trump International Hotel And Tower Chicago	Fundraiser	4/8/19
Deplorables Tour with Alexander Davis	Pro-Trump speaking tour	Trump International Hotel Washington DC	Speaking Event	4/13/19
Academy of Us	Veterans	Trump International	Reception	4/26/19
Veterans	organization	Hotel Washington DC		, ,
Bienvenido Summit	Hispanic pro- Trump organization	Trump International Hotel Washington DC	Gala	5/2/19
Trump First Tuesday	Networking event	Trump International Hotel Washington DC	Happy Hour	5/7/19
American Pro-Israel Pac	Conservative PAC in favor of closer ties with Israel	Mar-A-Lago Club	Gala	5/14/19
Walkaway	Encouraging Democrats to leave their party	Trump International Hotel Washington DC	Gala	5/17/19
Trump First Tuesday	Business networking organization	Trump International Hotel Washington DC	Happy Hour	6/4/19
Frontiers of Freedom	Conservative group	Trump International Hotel Washington DC	Ronald Reagan Awards Gala, A Washington D.C. Black Tie	6/11/19

Name	Description of Visitor	Property	Event/Spending Description	Start date of event
			Affair Honoring Senator Rand Paul.	
Diamond and Silk	Diamond and Silk (conservative commentators) "Flip It Red, Keep It Red" Chit Chat Tour	Trump National Doral Miami	Speaking Event	6/22/19
Trump 2020 Gala	United America for Trump, LLC	Trump International Hotel And Tower Chicago	Gala	7/20/19
Turning Point USA	Conservative student group	Trump International Hotel Washington DC	Liberty gala for young conservatives	7/23/2019
Heartland Institute	Conservative think tank, climate change denial	Trump International Hotel Washington DC	Conference	7/25/19
American Priority Festival and Conference	Pro-Trump conference and music festival	Trump National Doral Miami	Conservative political conference featuring Donald Trump Jr., Sarah Sanders, Florida Gov. Ron Desantis	10/10/19
Jexit Brunch	Jewish conservative group	Trump International Hotel Washington DC	Brunch with Roger Stone	10/20/2019

Table 7: Business Events at Trump Properties

Name	Description of Visitor	Property	Event/Spending Description	Start date of event
National Confectioners	Candy industry trade group	Trump International Hotel Washington DC	Washington Forum 2016 with Tucker Carlson	9/13/2016
Association National Railroad Construction and Maintenance Association	Trade group for railroad and rail transit construction industry	Trump International Hotel Washington DC	Dinner attended by Sen. Chuck Grassley	3/1/2017
National Confectioners Association	Candy industry trade group	Trump National Doral Miami	Industry conference	3/7/2017
Palm Beach Hedge Fund Association	Hedge fund investors group	Mar-A-Lago Club	Cocktails	3/16/2017
American Petroleum Institute	Oil industry trade group	Trump International Hotel Washington DC	Board Meeting (Meetings with EPA Administrator Scott Pruitt and Interior Secretary Ryan Zinke)	3/23/2017
Alliance Resource Partners LP	Coal company	Trump International Hotel Washington DC	Board of Directors Meeting	4/26/2017

Name	Description of Visitor	Property	Event/Spending Description	Start date of event
National Funeral Directors Association	Funeral home trade group	Trump International Hotel Washington DC	Dinner & Keynote Address with Newt Gingrich	4/27/2017
Blueprint 2025 Infrastructure Leadership Forum	Infrastructure investment forum	Trump International Hotel Washington DC	Welcome Reception	4/27/2017
Metals Service Center Institute	Metals industry trade association	Trump National Doral Miami	Annual Meeting	5/7/2017
International Menarini Foundation	Italian medical foundation	Trump International Hotel Washington DC	Italian medical foundation hosted cancer doctors	5/11/2017
U.S. Travel Association	Travel Industry group	Trump International Hotel Washington DC	Reception at Trump hotel, part of travel industry conference in D.C.	6/7/2017
Deloitte Global Financial Services Summit	Financial services conference	Trump International Hotel Washington DC	Deloitte conference on financial regulation	6/8/2017
Industrial Truck Association	Trade group for makers of forklifts and other industrial equipment	Trump International Hotel Washington DC	National Forklift Safety Day	6/12/2017
Vapor Technology Association	Vaping industry trade group	Trump International Hotel Washington DC	Vape & The FDA Conference	7/18/2017
National Confectioners Association	Candy industry trade group	Trump International Hotel Washington DC	Washington Forum	9/1/2017
Jefferson Chamber of Commerce	Louisiana business group	Trump International Hotel Washington DC	Three Day Washington Fly-In for business leaders	9/6/2017
Louisiana Association of Business and Industry	Louisiana business group	Trump International Hotel Washington DC	Federal outreach tour	9/12/2017
Domestic Energy Producers Alliance	Oil and natural gas trade group	Trump International Hotel Washington DC	Breakfast with Scott Pruitt	9/27/2017
GEO Group	Private prison company	Trump National Doral Miami	Annual Leadership Conference	10/1/2017
National Mining Association	Mining industry group	Trump International Hotel Washington DC	Board of Directors Meeting	10/3/2017
NAIOP, the Commercial Real Estate Development Association, D.C./Maryland Chapter	Real estate group	Trump International Hotel Washington DC	Awards of Excellence Gala	10/5/2017
American Land Title Association	Trade group for title industry	Trump National Doral Miami	Alta One: Title Industry Conference	10/10/2017

Name	Description of Visitor	Property	Event/Spending Description	Start date of event
Future of Technology Conference	Technology conference	Trump International Hotel Washington DC	Conference featuring Apple founder Steve Wozniak	11/2/2017
R2Con	Retail technology conference	Trump International Hotel Washington DC	Retail technology conference	11/8/2017
Oxbow Carbon LLC	Petroleum coke company founded by Bill Koch	Mar-A-Lago Club	Holiday Party	12/9/2017
U.S. Energy Association	Holiday reception for energy industry	Trump International Hotel Washington DC	Holiday Party	12/14/2017
Live Out Loud with Brooke Thomas	Women's business group	Mar-A-Lago Club	Dinner at Mar-A-Lago and Trump appearance	1/13/2018
Larry H. Miller Group of Companies	Owner of Utah car dealers, sports teams	Trump International Hotel Washington DC	Leadership Training for Employees	1/20/2018
Seasonal Employment Alliance	Business group promoting seasonal worker visas	Trump International Hotel Washington DC	Fly-In	2/14/2018
Independent Petroleum Association of America	Oil and gas producers	Trump International Hotel Washington DC	2018 Congressional Call-Up	3/5/2018
U.S. Chamber of Commerce Committee of 100	Chamber of Commerce executives from around U.S.	Trump National Doral Miami	Chamber pf Commerce Committee Of 100	3/6/2018
American Petroleum Institute	Oil and gas trade group	Trump International Hotel Washington DC	Board Of Directors Meeting	3/14/2018
Watergen Usa	Israeli water purification firm	Mar-A-Lago Club	Delegation from Israeli water purification company	3/29/2018
Community Financial Services Association	Payday lender trade group	Trump National Doral Miami	Annual Conference	4/16/2018
National Drug & Alcohol Screening Association	Drug and alcohol testing group	Trump International Hotel Washington DC	Board Of Directors Meeting	4/22/2018
Orange County Association of Realtors	Real estate group	Trump International Hotel Washington DC	Dinner at Blt Prime	5/5/2018
Align Technology	Orthodontics company	Trump International Hotel Washington DC	Reception at Lincoln Library	5/7/2018
American Association of Orthodontists	Orthodontist group	Trump International Hotel Washington DC	Party at Trump hotel DC	5/8/2018
Immedis	Irish international payroll and global mobility tax provider	Trump National Golf Club Washington Dc	Sponsorship of a golf day at Trump's Virginia golf club	5/14/2018
Washington Area Concierge Association	Hotel and building concierge group	Trump International Hotel Washington DC	Annual General Manager Breakfast	5/30/2018

Name	Description of Visitor	Property	Event/Spending Description	Start date of event
Luxrally	Exotic car rally	Trump International Hotel Washington DC	Exotic Car Rally Through Northeast	6/15/2018
Vapor Technology Association	Vaping industry trade group	Trump International Hotel Washington DC	Conference: "Vape & The FDA 3: Elevating The Conversation"	6/26/2018
National Confectioners Association	Candy industry trade group	Trump International Hotel Washington DC	Washington Forum	9/11/2018
Manusec Summitt	Cybersecurity event	Trump International Hotel and Tower Chicago	Conference	10/9/2018
Revgen Insight Summit	Marketing and business leaders conference	Trump Turnberry	Conference	3/3/2019
Independent Petroleum Association of America	Congressional call- up; fossil fuel industry	Trump International Hotel Washington DC	Lobbying	3/4/2019
Citizens for Responsible Energy Solutions	D.C. Fly-In for center- right energy group	Trump International Hotel Washington DC	Reception	3/11/2019
Brandusa	Travel agency	Trump International Hotel Washington DC	Reception	3/15/2019
Community Financial Services Association	Payday lender trade group	Trump National Doral Miami	Annual Conference	3/18/2019
Purina Mills	Farm animal feeds company	Trump International Hotel Washington DC	Unknown	3/23/2019
BlueStar	Latin America business conference for technology distributor	Trump National Doral Miami	Conference	4/8/2019
Options Industry Conference	Financial adviser education	Trump National Doral Miami	Conference featuring former Florida Gov. Jeb Bush, former Trump spokesman Anthony Scaramucci	5/1/2019
Palos Verde Peninsula Chamber of Commerce	Pro-business organization	Trump National Golf Club	Golf	5/16/2019
Florida Chiropractic Association	Chiropractors Association	Trump National Doral Miami	Southeast Regional Convention & Expo	6/20/2019
National Shooting Sports Foundation/Fair Trade Group	Pro-firearms trade group	Trump International Hotel Washington DC	Conference	7/30/2019
T-Mobile	CEO John Legere and other executives	Trump International Hotel Washington DC	Lodging, meeting space and other expenses while T-Mobile was trying to secure approval for merger with Sprint	Various

Table 8: Charity Events at Trump Properties

Name	Description of Visitor	Property	Event/Spending	Start date of
			Description	event
Believe With Me	Nonprofit for gold star families	Trump International Hotel Washington DC	Inaugural Luncheon	1/19/2017
Luke's Wings	Wounded veterans assistance group	Trump International Hotel Washington DC	Heroes Gala	4/8/2017
Penfed Foundation	Veterans organization	Trump International Hotel Washington DC	Night of Heroes	5/4/2017
Curetivity Foundation	Charity formerly known as Eric Trump Foundation	Trump National Golf Club	Fundraiser	9/18/2017
Paralyzed Veterans of America	Disabled veterans group	Trump International Hotel Washington DC	2017 Paralyzed Veterans of America Mission: Able Awards.	9/19/2017
National Defense University Foundation	Nonprofit supporting military education university	Trump International Hotel Washington DC	National defense briefing	10/13/2017
Young Adventurers	Youth Mentoring Program	Mar-A-Lago Club	Safari Night Ball	1/26/2018
Yellow Ribbon Fund	Wounded veterans assistance group	Trump International Hotel Washington DC	"Date Night" For Injured Veterans	2/21/2018
Big Dog Ranch Rescue	Animal welfare group	Mar-A-Lago Club	Wine Women & Shoes Benefiting Big Dog Ranch Rescue (Lara Trump Was Co- Chair Of Event)	3/10/2018
Luke's Wings	Wounded veterans assistance group	Trump International Hotel Washington DC	Heroes Gala	4/7/2018
Tour and High Tea At The Trump International Hotel	Army Spouses' Club of the Greater Washington Area	Trump International Hotel Washington DC	Tour	4/20/2018
Paralyzed Veterans of America	Disabled veterans group	Trump International Hotel Washington DC	2018 Mission: Able Awards	9/25/2018
Tour And High Tea At The Trump International Hotel	Army Spouses' Club of the Greater Washington Area	Trump International Hotel Washington DC	Tour And Tea	12/19/2018
Navy Seal Evening of Tribute	Raising money for Navy SEALs	Mar-A-Lago Club	Charity	4/1/2019
National Life Insurance Council	Fundraising for City of Hope hospital	Trump International Hotel Washington DC	Charity	4/27/2019
Kris Boyd Charity	Mental health awareness	Trump Turnberry, UK	Fundraiser	5/7/2019
St. Jude Open	Cancer charity	Trump National Golf Club	Golf	5/14/2019
Shaun O'Hara Foundation	Cystic Fibrosis fundraiser	Trump National Golf Club - Bedminster, N.J.	Golf	5/29/2019
New York Jets Charity Golf Classic	New York Jets, Jets fans	Trump National Golf Club - Bedminster, N.J.	Annual charity golf event at Trump golf club in New Jersey.	6/3/19

Name	Description of Visitor	Property	Event/Spending Description	Start date of event
			Jets Owner, billionaire Woody Johnson is a Trump friend who serves as U.S. Ambassador to the U.K.	
Curetivity Foundation	Eric Trump's cancer charity	Mar-A-Lago Club	Gala	6/10/2019
St. Jude Open	Cancer charity	Trump National Golf Club Colts Neck	Golf	7/8/2019
Boy Scouts of America	Scouting organization	Trump National Golf Club - Bedminster, N.J.	Golf	7/30/2019

Table 9: Religious Groups Holding Events at Trump Properties

Name	Description of Visitor	Property	Event/Spending Description	Start date of event
Billy Graham Evangelistic Association	Christian group started by Billy Graham in 1950	Trump International Hotel Washington DC	World Summit In Defense Of Persecuted Christians	5/12/17
The Call	Christian right group	Trump International Hotel Washington DC	Birthday Of Christian Leader Lou Engle	10/9/17
Revival Outside The Walls	Evangelical ministry founded by TV host Barry Meguiar	Trump International Hotel Washington DC	Founding Partners Dinner	11/4/17
First Liberty Institute	Christian right group	Trump International Hotel Washington DC	Dinner	11/8/17
Museum of The Bible	Biblical history museum created by Hobby Lobby president Steve Green	Trump International Hotel Washington DC	Dedication Gala	11/16/17
Order of St. Andrew The Apostle	Orthodox Christian Group	Trump International Hotel Washington DC	3 rd Archon International Conference on Religious Freedom	12/4/17
Republican Jewish Coalition + America First Action	Jewish GOP Group founded by Sheldon Adelson	Trump International Hotel Washington DC	Hanukkah Nightcap	12/7/17
Orphan'S Promise	Children's ministry of televangelist Pat Robertson's Christian Broadcasting Network	Mar-A-Lago Club	1St Annual Dream Gala	2/17/18
Dutch Sheets Ministries	Christian ministry led by evangelist Dutch Sheets	Trump International Hotel Washington DC	The Turnaround An Appeal To Heaven National Gathering	2/22/18
Truth About Israel Gala	Remembrance of the 45th Anniversary of the 1972 Olympics killings Munich	Mar-A-Lago Club	Truth About Israel Gala	2/25/18

Name	Description of Visitor	Property	Event/Spending Description	Start date of event
Oral Roberts University	Christian university	Trump International Hotel Washington DC	President's Circle Retreat with ORU President William Wilson	3/10/18
International Fellowship of Christians And Jews	Evangelical-funded Israel charity	Mar-A-Lago Club	Fundraiser	3/26/18
Celebration of Motherhood	Evangelical event	Trump International Hotel Washington DC	Luncheon with Candy Carson	5/16/18
Good Friday Prayer Breakfast	Pro-Trump faith leaders	Trump International Hotel Washington DC	Breakfast	4/19/19
Evangelical meeting before National Day of Prayer	Evangelical leaders	Trump International Hotel Washington DC	Meeting of evangelical leaders on 2020 election	5/1/19
Presidential Inaugural Prayer Breakfast Inc.	Pro-Trump faith leaders	Trump International Hotel Washington DC	Breakfast	7/6/19

Table 10: Police/Fire Groups Holding Events at Trump Properties

Name	Description of Visitor	Property	Event/Spending Description	Start date of event
Chicago Police Department	Chicago police	Trump International Hotel and Tower Chicago	Use of Conference Room	1/20/18
Jupiter Police Foundation	Police organization	Trump National Golf Club	Gala	3/29/19
Far Hills- Bedminster Fire Department	Fire department	Trump National Golf Club - Bedminster, N.J.	Gala	4/6/19
Palm Beach Police Foundation	Police organization	Trump International Golf Club Palm Beach	Golf	4/8/19
Thornwood Fire Department	Local fire department	Trump National Golf Club Westchester	Awards Ceremony	5/4/19
Dade County Police Benevolent Association	Local law enforcement organization	Trump National Doral Miami	Gala	5/18/19