

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND  
Greenbelt Division**

THE DISTRICT OF COLUMBIA and  
THE STATE OF MARYLAND,

*Plaintiffs,*

v.

DONALD J. TRUMP, President of the United  
States of America, in his official capacity and in his  
individual capacity,

*Defendant.*

Civil Action No. 8:17-cv-01596-PJM

**DECLARATION OF BRANDON BROCKMYER IN SUPPORT OF  
PLAINTIFFS' OPPOSITION TO DEFENDANT'S MOTION TO DISMISS  
IN HIS INDIVIDUAL CAPACITY**

I, BRANDON BROCKMYER, hereby declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the following is true and correct:

1. I am the Research Director for Citizens for Responsibility and Ethics in Washington, which serves as counsel to plaintiffs the District of Columbia and the State of Maryland in the above-captioned case. I am personally familiar with the facts set forth herein.
2. Attached hereto as Exhibit 1 is a true and correct copy of the article titled "Trump discusses his presidential campaign at Linthicum GOP dinner," published by the Capital Gazette on June 23, 2015, as it appeared on the website <http://www.capitalgazette.com/news/ph-ac-cn-trump-republican-dinner-0624-20150623-story.html> on May 16, 2018. In a video and audio recording published on the same website, President Trump stated, "I know Baltimore, I have so many friends . . . I'm in Baltimore a lot."
3. Attached hereto as Exhibit 2 is a true and correct copy of the article titled "Trump Criticizes Bush, Democrats in Maryland GOP Speech," published by WBAL News Radio 1090

on June 23, 2015, as it appeared on the website <http://www.wbal.com/article/115732/3/trump-criticizes-bush-democrats-in-maryland-gop-speech> on May 16, 2018. In an audio recording published on the same website, President Trump stated, “We’ve had a great relationship to Maryland. I’ve been here so many times, and I have so many friends . . . we work very closely with the people of Maryland. So we’ve just had a really spectacular relationship to the people of Maryland.”

4. Attached hereto as Exhibit 3 is a true and correct copy of the article titled “Updated: Trump Re-Issues Message to ‘Take the Country’ Back at Rally in Worcester County,” published by WBOC 16 on April 21, 2016, as it appeared on the website <http://www.wboc.com/story/31775229/attenders-protestors-on-hand-ahead-of-trump-rally-in-worcester-county> on May 16, 2018.

5. Attached hereto as Exhibit 4 is a true and correct copy of the article titled “Trump draws thousands to Hagerstown airport rally,” published by Herald-Mail Media on April 24, 2016, as it appeared on the website [https://www.heraldmillmedia.com/news/local/trump-draws-thousands-to-hagerstown-airport-rally/article\\_bc5f407c-0a76-11e6-b6b3-9304f74a9c19.html](https://www.heraldmillmedia.com/news/local/trump-draws-thousands-to-hagerstown-airport-rally/article_bc5f407c-0a76-11e6-b6b3-9304f74a9c19.html) on May 16, 2018.

6. Attached hereto as Exhibit 5 is a true and correct copy of the article titled “Trump supporters, protesters confront each other in Baltimore,” published by the Baltimore Sun on September 12, 2016, as it appeared on the website <http://www.baltimoresun.com/news/maryland/politics/bs-md-ci-trump-rally-protest-20160912-story.html> on May 16, 2018.

7. Attached hereto as Exhibit 6 is a true and correct copy of the website titled “The Grounds: Camp David,” published by the White House, as it appeared on the website <https://www.whitehouse.gov/about-the-white-house/camp-david/> on May 16, 2018.

8. Attached hereto as Exhibit 7 is a true and correct copy of the article titled “Trump returns to Camp David in search of a legislative agenda,” published by the Baltimore Sun on January 5, 2018, as it appeared on the website <http://www.baltimoresun.com/news/maryland/politics/blog/bs-md-trump-camp-david-20180105-story.html> on May 16, 2018.

9. Attached hereto as Exhibit 8 is a true and correct copy of the article titled “Trump addresses military families at Joint Base Andrews,” published by UPI on September 15, 2017, as it appeared on the website <https://www.upi.com/Trump-addresses-military-families-at-Joint-Base-Andrews/1031505498032/> on May 16, 2018.

10. Attached hereto as Exhibit 9 is a true and correct copy of the transcript titled “Remarks by President Trump at the Conservative Political Action Conference,” published by the White House and dated February 24, 2017, as it appeared on the website <https://www.whitehouse.gov/briefings-statements/remarks-president-trump-conservative-political-action-conference/> on May 16, 2018. The transcript began by stating, “Gaylord National Resort & Convention Center,” indicating the location of the remarks.

11. Attached hereto as Exhibit 10 is a true and correct copy of the article titled “Trump tells conservative gathering that his supporters are the GOP’s future,” published by the Washington Post on February 24, 2017, as it appeared on the website <https://www.washingtonpost.com/politics/trump-tells-conservative-gathering-that-his-supporters->

are-the-partys-future/2017/02/24/5fd33764-fab7-11e6-bf01-d47f8cf9b643\_story.html?utm\_term=.0dedfdc2b2c5 on May 16, 2018.

12. Attached hereto as Exhibit 11 is a true and correct copy of the website titled “2017 CPAC Speakers,” as it appeared on the website <http://cpac.conservative.org/cpac-2017-speakers/> on May 16, 2018. The website listed at least 38 speakers other than President Trump who were at the time domestic government officials, including 17 state and local officials. The website also listed Nigel Farage as a speaker.

13. Attached hereto as Exhibit 12 is a true and correct copy of the website titled “ARCHIVED: CPAC 2017 Agenda,” as it appeared on the website <http://cpac.conservative.org/agenda/cpac2017/> on May 16, 2018. The website listed both President Trump and “Nigel Farage, Member of the European Parliament,” as scheduled to speak at CPAC on February 24, 2017.

14. Attached hereto as Exhibit 13 is a true and correct copy of the article titled “Nigel Farage says Brexit and Trump win are ‘beginning of global revolution,’” published by The Guardian on February 24, 2017, as it appeared on the website <https://www.theguardian.com/us-news/2017/feb/24/nigel-farage-cpac-speech-trump-brexit-global-revolution> on May 16, 2018.

15. Attached hereto as Exhibit 14 is a true and correct copy of the European Parliament website for Nigel Farage, member from the United Kingdom, as it appeared on the website [http://www.europarl.europa.eu/meps/en/4525/NIGEL\\_FARAGE\\_home.html](http://www.europarl.europa.eu/meps/en/4525/NIGEL_FARAGE_home.html) on May 16, 2018.

16. Attached hereto as Exhibit 15 is a true and correct copy of the article titled “Inside Trump’s Secret Dinner: A Side of the President You Don’t Ever See,” published by IJR News on February 26, 2017, as it appeared on the website <https://ijr.com/2017/02/810965-trump-ditched->

the-press-to-have-dinner-heres-how-the-president-acts-when-no-one-is-watching/ on May 16, 2018. The article described President Trump's dinner at the BLT Prime at the Trump International Hotel on February 25, 2017, the day after his and Nigel Farage's CPAC speeches. Specifically, the article stated: (a) "5:50 PM: . . . Inside the restaurant, on the first level, an uncommon guest is having a cocktail. It's Nigel Farage, the Brexit leader and Trump ally, who is sitting at a table with three other people."; (b) "8:17 PM: Without any announcement or indication, President Trump enters the hotel lobby which bears his name, . . . Trump is rushed by fans in the lobby as he makes his way to the steakhouse. Secret Service makes a barrier for him, and the President waves and shakes hands on his way. The young crew are the first in line. Also waiting in line as the President arrives is Nigel Farage."; (c) This part of the article was followed by a photograph with the caption, "Trump and Farage meeting in the lobby"; (d) "Trump stops momentarily to speak with Farage and points upstairs in the steakhouse, seemingly inviting him to dinner."; (e) This part of the article was followed by a photograph that showed President Trump pointing up; (f) "Trump eventually sits precisely where I expected he would hours earlier. He is joined by Farage, Governor Rick Scott of Florida, and his daughter Ivanka and her husband Jared Kushner."; (g) The article later included photographs of Mr. Farage eating with President Trump and his other guests; (h) "11:01 PM: Nigel Farage can be found wandering the lobby of the hotel with a large glass of red wine. His teeth are wine-stained, and the British politician is happily swaying and speaking with anyone who approaches him."

17. Attached hereto as Exhibit 16 is a true and correct copy of the article titled, "Dinner with the Donald': Nigel Farage joins Trump's table at Washington hotel," published by The Guardian on February 26, 2017, as it appeared on the website <https://www.theguardian.com/politics/2017/feb/26/nigel-farage-dinner-with-the-donald-joins->

trumps-table-at-washington-hotel on May 16, 2018. The article included a photograph with the caption “Nigel Farage posted a picture of himself having dinner with Donald Trump.”

18. Attached hereto as Exhibit 17 is a true and correct copy of a tweet posted on the @DanJukes17 Twitter account on February 24, 2017, as it appeared at <https://twitter.com/danjukes17/status/835295920086519808/photo/1> on May 16, 2018. The tweet stated, “Par-tay #CPAC” and showed a photograph of Mr. Farage and Dan Jukes. The profile of the @DanJukes17 Twitter account stated, “Dan Jukes” and “Communications for @Nigel\_Farage”.

19. Attached hereto as Exhibit 18 is a true and correct copy of a tweet posted on the @DanJukes17 Twitter account on February 25, 2017, as it appeared at <https://twitter.com/DanJukes17/status/835675727580254209> on May 16, 2018. The tweet stated, “With the beautiful @RealDrGina at Trump International Hotel” and showed a photograph of Mr. Jukes.

20. Attached hereto as Exhibit 19 is a true and correct copy of the transcript titled “Remarks by President Trump at the Conservative Political Action Conference,” published by the White House and dated February 23, 2018, as it appeared on the website <https://www.whitehouse.gov/briefings-statements/remarks-president-trump-conservative-political-action-conference-2/> on May 16, 2018. The transcript began by stating, “Gaylord National Resort & Convention Center Oxon Hill, Maryland,” indicating the location of the remarks.

21. Attached hereto as Exhibit 20 is a true and correct copy of the article titled “Why the hard-right activists at CPAC love Trump so much,” published by the Washington Post on February 23, 2018, as it appeared on the website <https://www.washingtonpost.com/blogs/plum->

line/wp/2018/02/23/why-the-hard-right-activists-at-cpac-love-trump-so-much/?utm\_term=.9ca62ae4c79d on May 16, 2018.

22. Attached hereto as Exhibit 21 is a true and correct copy of the website titled “2018 CPAC Speakers,” as it appeared on the website <http://cpac.conservative.org/cpac-speakers/> on May 16, 2018. The website listed at least 17 speakers other than President Trump who were at the time domestic government officials, including 6 state and local officials. The website also listed Nigel Farage and Charlie Kirk as speakers.

23. Attached hereto as Exhibit 22 is a true and correct copy of the website titled “ARCHIVED: CPAC 2018 Agenda,” as it appeared on the website <http://cpac.conservative.org/agenda/cpac-2018-agenda/> on May 16, 2018. The agenda listed both President Trump and Nigel Farage as scheduled to speak at CPAC on February 23, 2018. The agenda further listed “Charlie Kirk, Turning Point USA” and “Candace Owens, Turning Point USA” as panelists on February 22, 2018.

24. Attached hereto as Exhibit 23 is a true and correct copy of the article titled “Nigel Farage gets warm welcome at gathering of US right wing,” published by The Guardian on February 23, 2018, as it appeared on the website <https://www.theguardian.com/us-news/2018/feb/23/cpac-nigel-farage-sadiq-khan-us-conservatives> on May 16, 2018.

25. Attached hereto as Exhibit 24 is a true and correct copy of excerpts of the “Politico Playbook” website article titled “WARREN BUFFETT’S WINDFALL: Berkshire Hathaway got 29 billion from tax reform,” published by Politico on February 24, 2018, as it appeared on the website <https://www.politico.com/newsletters/playbook/2018/02/24/warren-buffetts-windfall-berkshire-hathaway-got-29-billion-from-tax-reform-251285> on May 16, 2018.

The website article stated, “SPOTTED: Nigel Farage last night ‘holding court’ at the bar at the Trump Hotel”.

26. Attached hereto as Exhibit 25 is a true and correct copy of an Instagram page of “nigel\_farage” published on February 24, 2018, as it appeared on Instagram at <https://www.instagram.com/p/BfmHBeIgUga/> on May 16, 2018. The photograph showed President Trump and Mr. Farage, and the caption stated, “Good to catch up. [@realdonaldtrump](#) in great humour and on top form. 📷 Official White House Photo by Shealah Craighead.”

27. Attached hereto as Exhibit 26 is a true and correct copy of the Instagram profile page of “frankelicata”, as it appeared on Instagram at <https://www.instagram.com/frankelicata/> on May 16, 2018, identifying the account as belonging to Frank Licata. Also attached hereto is a true and correct copy of the Instagram page of “frankelicata”, published on February 24, 2018, as it appeared on Instagram at <https://www.instagram.com/p/BfmWEiaHW2f/> on May 16, 2018. The photograph showed Mr. Farage and Mr. Licata, and the caption for the photograph stated, “had a great night at the Trump International Hotel bar in DC meeting with some very interesting people, such as Brexit architect Nigel Farage, leader of the UK Independence Party and member of the European Parliament for South England.”

28. Attached hereto as Exhibit 27 is a true and correct copy of an Instagram page of “frankelicata”, published on February 24, 2018, as it appeared on Instagram at <https://www.instagram.com/p/BfmIqlwnFJ4/?taken-by=frankelicata> on May 16, 2018. The photograph showed Mr. Licata in front of a CPAC 2018 sign, and the caption stated, “TrumpLoyalists representing at CPAC 2018 . . .”

29. Attached hereto as Exhibit 28 is a true and correct copy of the website titled “About Shiva”, as it appeared on the website <https://shiva4senate.com/about-shiva/> on May 16,



2016. The website contained a link “to download the Dr. Shiva Ayyadurai’s CV” and stated, “I am running for United States Senate from Massachusetts to be a 21st century Senator.”

30. Attached hereto as Exhibit 29 is a true and correct copy of a screenshot of a video entitled “Dr. Shiva Ayyadurai Live at CPAC 2018”, posted on YouTube on April 20, 2018, as it appeared on the website <https://www.youtube.com/watch?v=jgSnpolvPC4> on May 16, 2018. In the video, Dr. Ayyadurai stated, “Alright everyone, we’re live here at CPAC again.”


31. Attached hereto as Exhibit 30 is a true and correct copy of a screenshot of a video entitled “with Nigel Farage at Trump International Hotel bar in DC”, posted on YouTube on February 26, 2018, as it appeared on the website <https://www.youtube.com/watch?v=Z2OmuhJqiaM> on May 16, 2018. In the video, Mr. Farage, Mr. Licata, and Dr. Ayyadurai are shown at the bar at the Trump International Hotel on February 23, 2018.

32. Attached here to as Exhibit 31 is a true and correct copy of the article titled, “Young Conservatives Took the Stage at CPAC,” published by The American Spectator on March 5, 2018, as it appeared on the website <https://spectator.org/young-conservatives-took-the-stage-at-cpac/> on May 16, 2018. The article stated that at CPAC 2018, “Candace Owens of Turning Point (27), and Charlie Kirk of Turning Point (24) . . . spoke on panels during the convention.”

33. Attached hereto as Exhibit 32 is a true and correct copy of the Instagram profile page of “realcandaceowens”, as it appeared on Instagram at <https://www.instagram.com/realcandaceowens/> on May 16, 2018, identifying the account as belonging to Candace Owens. Also attached hereto is a true and correct copy of an Instagram page of “realcandaceowens”, published on February 24, 2018, as it appeared on Instagram at

<https://www.instagram.com/p/BfkjtWHAeR4/> on May 16, 2018. The location of the photograph was listed on the Instagram page as “Trump International Hotel Washington, D.C.”, and clicking on the photograph showed Instagram tags for the individuals shown, two of which were “realcandaceowens” and “charliekirk 1776”.

34. Attached hereto as Exhibit 33 is a true and correct copy of the Instagram profile page of “charliekirk1776”, as it appeared on Instagram at <https://www.instagram.com/charliekirk1776/> on May 16, 2018. The profile identified the account as belonging to Charlie Kirk, provided the email address “charlie@TPUSA.com”, and provided a link to [www.TPUSA.com/GetInvolved](http://www.TPUSA.com/GetInvolved).

35. Attached hereto as Exhibit 34 is a true and correct copy of the Instagram profile page of “kayajones”, as it appeared on Instagram at <https://www.instagram.com/kayajones/> on May 16, 2018. The profile identified the account as belonging to Kaya Jones. Also attached hereto is a true and correct copy of an Instagram page of “kayajones”, published on February 23, 2018, as it appeared on Instagram at <https://www.instagram.com/p/BfjEY16BxeY/> on May 16, 2018. The caption of the photograph stated, “What an honor it was to sing the anthem for our nation and our [@POTUS](https://www.instagram.com/POTUS) [@realDonaldTrump](https://www.instagram.com/realDonaldTrump) #CPAC #MAGA #CPAC#cpac2018 live us    thank you America. Thank you CPAC. Thank you President Trump”.

36. Attached hereto as Exhibit 35 is a true and correct copy of the Instagram page of “realdrgina”, published on February 23, 2018, as it appeared on Instagram at <https://www.instagram.com/p/BfkHMENgX9Y/> on May 16, 2018. The location of the photograph was listed on Instagram as “Trump International Hotel Washington, D.C.”, and the caption of the photograph stated, “DC squad: [@kayajones](https://www.instagram.com/kayajones) [@katrinapierson](https://www.instagram.com/katrinapierson) #cpac2018 #CPAC”.

37. Attached hereto as Exhibit 36 is a true and correct copy of a transcript of an interview titled “Transcript: Donald Trump interview with Bob Woodward and Robert Costa,” published by the Washington Post on April 2, 2016, as it appeared on the website [https://www.washingtonpost.com/news/post-politics/wp/2016/04/02/transcript-donald-trump-interview-with-bob-woodward-and-robert-costa/?noredirect=on&utm\\_term=.28f75f7c173c](https://www.washingtonpost.com/news/post-politics/wp/2016/04/02/transcript-donald-trump-interview-with-bob-woodward-and-robert-costa/?noredirect=on&utm_term=.28f75f7c173c) on May 16, 2018.

38. Attached hereto as Exhibit 37 is a true and correct copy of a transcript of an interview titled “A transcript of Donald Trump’s meeting with The Washington Post editorial board,” published by the Washington Post on March 21, 2016, as it appeared on the website [https://www.washingtonpost.com/blogs/post-partisan/wp/2016/03/21/a-transcript-of-donald-trumps-meeting-with-the-washington-post-editorial-board/?utm\\_term=.5d7ef1b6ecb4](https://www.washingtonpost.com/blogs/post-partisan/wp/2016/03/21/a-transcript-of-donald-trumps-meeting-with-the-washington-post-editorial-board/?utm_term=.5d7ef1b6ecb4) on May 16, 2018.

39. Attached hereto as Exhibit 38 is a true and correct copy of a reference document titled “2017 AdBook,” published by the Washington Post, as it appeared on the website [https://www.washingtonpost.com/wp-stat/ad/public/static/media\\_kit/16-3365-01-AdBook.pdf](https://www.washingtonpost.com/wp-stat/ad/public/static/media_kit/16-3365-01-AdBook.pdf) on May 16, 2018. The document contained circulation information, as well as advertising deadlines, mechanical specifications, and submission requirements.

40. Attached hereto as Exhibit 39 is a true and correct copy of the article titled “Trump: Make America great again (and stay at my hotel!),” published by the Washington Post on October 12, 2016, as it appeared on the website [https://www.washingtonpost.com/news/digger/wp/2016/10/12/trump-make-america-great-again-and-stay-at-my-hotel/?noredirect=on&utm\\_term=.f9852f169784](https://www.washingtonpost.com/news/digger/wp/2016/10/12/trump-make-america-great-again-and-stay-at-my-hotel/?noredirect=on&utm_term=.f9852f169784) on May 16, 2018.

41. Attached hereto as Exhibit 40 is a true and correct copy of a tweet posted on the @realdonaldtrump Twitter account on March 12, 2015, as it appeared at <https://twitter.com/realDonaldTrump/status/576089949038125056> on May 16, 2018. The tweet stated, “Trump International Hotel, Washington D.C. will be one of the world’s top luxury hotels” and linked to the Trump Organization’s “Trump International Hotel, Washington, D.C.” website at <https://www.trump.com/trump-hotels/washington-dc/trump-intl-hotel/>.

42. Attached hereto as Exhibit 41 is a true and correct copy of a tweet posted on the @realdonaldtrump Twitter account on April 23, 2015, as it appeared at <https://twitter.com/realDonaldTrump/status/591439411050651649> on May 16, 2018. The tweet stated, ““@dcfoodsafety: @realDonaldTrump Your new DC hotel sign should say future hotel of our next president! #Trump2016””.

43. Attached hereto as Exhibit 42 is a true and correct copy of a tweet posted on the @realdonaldtrump Twitter account on May 13, 2015, as it appeared at <https://twitter.com/realDonaldTrump/status/598475321856385024> on May 16, 2018. The tweet stated, “My major hotel conversion of The Old Post Office on Pennsylvania Avenue in D.C. is under budget and ahead of schedule. Should be U.S.A.”.

44. Attached hereto as Exhibit 43 is a true and correct copy of two tweets posted on the @realdonaldtrump Twitter account on September 25, 2015, as they appeared at <https://twitter.com/realDonaldTrump/status/647473172988755968> and <https://twitter.com/realDonaldTrump/status/647479763280527360> on May 16, 2018. The first tweet stated, “I am now inspecting the Old Post Office on Pennsylvania Avenue - will be a great hotel. Soon off to the Oklahoma State Fair!” The second tweet stated, “At the Old Post Office-” and showed a photo of President Trump.

45. Attached hereto as Exhibit 44 is a true and correct copy of a tweet posted on the @realdonaldtrump Twitter account on January 28, 2016, as it appeared at <https://twitter.com/realDonaldTrump/status/692794133124116480> on May 16, 2018. The tweet stated, “20 Most Anticipated Hotel Openings of 2016: Trump International Hotel, Washington D.C.”, and linked to an article in *Forbes* at <https://www.forbes.com/sites/forbestravelguide/2016/01/28/20-most-anticipated-hotel-openings-of-2016/#4d04fc273298>.

46. Attached hereto as Exhibit 45 is a true and correct copy of a tweet posted on the @realdonaldtrump Twitter account on September 12, 2016, as it appeared at <https://twitter.com/realDonaldTrump/status/775361266001084416> on May 16, 2018. The tweet stated, “Stopped by @TrumpDC to thank all of the tremendous men & women for their hard work!”

47. Attached hereto as Exhibit 46 is a true and correct copy of a tweet posted on the @realdonaldtrump Twitter account on September 16, 2016, as it appeared at <https://twitter.com/realDonaldTrump/status/776773380414537728> on May 16, 2018. The tweet stated, “I am now going to the brand new Trump International, Hotel D.C. for a major statement.”

48. Attached hereto as Exhibit 47 is a true and correct copy of the article titled “Two contractors allege getting stiffed for work on Trump’s D.C. hotel,” published by the Washington Post on January 5, 2017, as it appeared on the website [https://www.washingtonpost.com/news/digger/wp/2017/01/05/two-contractors-allege-getting-stiffed-for-work-on-trumps-d-c-hotel/?utm\\_term=.3fb1ac0205a5](https://www.washingtonpost.com/news/digger/wp/2017/01/05/two-contractors-allege-getting-stiffed-for-work-on-trumps-d-c-hotel/?utm_term=.3fb1ac0205a5) on May 16, 2018. The article stated, “Joseph J. Magnolia Inc., is a private, family-owned plumbing firm with offices in

Northeast D.C. and suburban Maryland that claims it is out \$2.98 million,” and further stated, “Magnolia ‘completed all plumbing, mechanical and HVAC work, along with site sewer, water, storm and water services’ on the project, according to its filing with the D.C. government.”

49. Attached hereto as Exhibit 48 is a true and correct copy of the General Information listing for “Joseph J. Magnolia, Inc.” in the Maryland Department of Assessments and Taxation’s Business Entity Search, as it appeared on the website <https://egov.maryland.gov/BusinessExpress/EntitySearch/BusinessInformation/D00128520> on May 16, 2018. The website stated Joseph J. Magnolia, Inc.’s state of formation is Maryland and its principal office is in Laurel, Maryland.

50. Attached hereto as Exhibit 49 is a true and correct copy of the article titled “Trump Hotel Paid Millions in Fines for Unpaid Work,” published by the Daily Beast on February 23, 2018, as it appeared on the website <https://www.thedailybeast.com/trump-hotel-paid-millions-in-fines-for-unpaid-work> on May 16, 2018. The article stated, “Magnolia’s attorney, Michael P. Darrow, told The Daily Beast, that ‘Trump actually called my client the day before the inauguration and they reached an agreement over the phone. So I was instructed to close out. I never was privy to the exact terms but JJM I believe got most of their \$\$\$.’ When asked via phone to clarify if by ‘Trump’ he meant the president-elect or a different representative of the organization, Darrow declined to comment. Instead he referred inquiries to John D. Magnolia, saying, ‘He may well be willing to chat with you, cause it’s a fascinating story.’ Via Darrow though, Magnolia declined to comment.”

51. Attached hereto as Exhibit 50 is a true and correct copy of the article titled “Third lien on Trump hotel brings alleged unpaid bills to over \$5 million,” published by the Washington Post on January 6, 2017, as it appeared on the website

[https://www.washingtonpost.com/news/digger/wp/2017/01/06/third-lien-on-trump-hotel-brings-alleged-unpaid-bills-to-over-5-million/?utm\\_term=.a1709c44fda9](https://www.washingtonpost.com/news/digger/wp/2017/01/06/third-lien-on-trump-hotel-brings-alleged-unpaid-bills-to-over-5-million/?utm_term=.a1709c44fda9) on May 16, 2018. The article stated, “In the frenzied final six weeks of work at the hotel, while Trump touted the project on the campaign trail, AES of Laurel, Md., claims it assigned 45 members of its staff to work 12-hour shifts for nearly 50 consecutive days to get the lights, electrical and fire systems prepared on time. ‘We had people there well over 12 hours a day for weeks because they had a hard opening of Sept. 12 and you can’t open if the lights don’t work and the fire alarms don’t work and the fire marshal can’t inspect it,’ said Tim Miller, executive vice president of AES. ‘There is a lot of work that went into that hotel, and it didn’t happen by accident.’”

52. Attached hereto as Exhibit 51 is a true and correct copy of the Amended Complaint to Establish and Enforce Mechanic’s Lien To Be Enforced As a Judgment Against Trump Old Post Office LLC and Fidelity and Deposit Company of Maryland Pursuant To the Mechanic’s Lien Undertaking, filed in *AES Electrical d/b/a Freestate Electrical Construction Co. v. Trump Old Post Office LLC, et al.*, Case No. 2017 CA 000369 R(RP) (D.C. Sup. Ct.) on February 13, 2017, as it appeared on the website <https://assets.documentcloud.org/documents/3535336/2-13-17-AES-Electrical-Amended-Complaint.pdf> on May 16, 2018. The Complaint alleged: (a) Freestate “maintain[s] a principal office” in Laurel, Maryland; (b) “for the renovation of the historical Old Post Office building . . . to convert it into the Trump Hotel,” Freestate “performed electrical work as required” under a subcontract “during the period between September 29, 2014 through the date of this filing”; (c) Freestate “incurred the majority of the change work costs because of Trump’s directives, delivered through [the prime contractor], to accelerate work and perform extra work on the Project in order to permit the ‘soft opening’ of the Trump Hotel by September 12, 2016, due to

the fact that Trump had booked paid events and had planned for the use of Hotel rooms on or about that date.”; (d) “At the time of the ‘soft opening,’ Donald J. Trump, President of Defendant, Trump Old Post Office, LLC, was a U.S. Presidential candidate and the ‘soft opening,’ had to occur to permit Mr. Trump’s nationally televised campaign event from the Hotel on September 16, 2016, which was to honor U.S. veterans.”; (e) “Subsequent to the Hotel’s ‘soft opening,’ Freestate was required to continue its acceleration efforts and the performance of extra work in order to permit the ‘grand opening’ of the Trump Hotel by October 26, 2016.”; and (f) “The ‘grand opening’ of the Trump Hotel by this date, was also a nationally covered event, which was planned just prior to the U.S. presidential election in early November 2016, to provide an opportunity for positive press coverage for Mr. Trump’s presidential campaign.”

53. Attached hereto as Exhibit 52 is a true and correct copy of the General Information listing for “AES Electrical, Inc.” in the Maryland Department of Assessments and Taxation’s Business Entity Search, as it appeared on the website <https://egov.maryland.gov/BusinessExpress/EntitySearch/BusinessInformation/F06052989> on May 16, 2018. The website stated AES Electrical, Inc.’s principal office is in Laurel, Maryland.

54. Attached hereto as Exhibit 53 is a true and correct copy of the webpage titled “The Yellow Ribbon Fund’s ‘Duty & Devotion’” on the Getty Images website, as it appeared at <https://www.gettyimages.com/event/the-yellow-ribbon-funds-duty-devotion-775128787#kellyanne-conway-white-house-counselor-to-president-donald-trump-at-picture-id922589328> on May 16, 2018. The website showed a photograph with the caption, “Kellyanne Conway, White House Counselor to President Donald Trump, speaks at the Yellow Ribbon



Fund's 'Duty & Devotion' event at Trump International Hotel on February 21, 2018 in Washington, DC." The website also linked to additional photographs of the same event.

55. Attached hereto as Exhibit 54 is a true and correct copy of the General Information listing for "Yellow Ribbon Fund, Inc." in the Maryland Department of Assessment and Taxation's Business Entity Search, as it appeared on the website <https://egov.maryland.gov/BusinessExpress/EntitySearch/BusinessInformation/D10447019> on May 16, 2018. The website stated Yellow Ribbon Fund, Inc.'s state of formation is Maryland and its principal office is in Bethesda, Maryland.

56. Attached hereto as Exhibit 55 is a true and correct copy of excerpts of the Federal Election Commission Form 3 2016 October Quarterly Report filed by Plaster for Congress, the principal campaign committee of Mark Plaster, a candidate for Congress from Maryland's third congressional district, as it appeared on the Federal Election Commission website <http://docquery.fec.gov/pdf/302/201703219050967302/201703219050967302.pdf> on May 16, 2018.

57. Attached hereto as Exhibit 56 is a true and correct copy of a webpage for the "Awards of Excellent Gala" for the NAIOP Commercial Real Estate Development Association, DC/MD Chapter, as it appeared on the website <https://naiop.site-ym.com/events/EventDetails.aspx?id=984949> on May 16, 2018. The webpage stated the location of the event was "Trump International Hotel" and the date was October 5, 2017.

58. Attached hereto as Exhibit 57 is a true and correct copy of a webpage entitled "Contact Us" for the NAIOP Commercial Real Estate Development Association, DC/MD chapter, as it appeared on the website <https://naiop.site-ym.com/?page=A4> on May 16, 2018. The

webpage lists the mailing address of the NAIOP DC/MD chapter and its executive director in Kensington, Maryland.

59. Attached hereto as Exhibit 58 is a true and correct copy of a menu for BLT Prime, as it appeared on the website [https://bltrestaurants.com/index.php?aam\\_media=2927](https://bltrestaurants.com/index.php?aam_media=2927) on May 17, 2018. The “Oysters” section of the menu lists “Barren Island Maryland”.

60. Attached hereto as Exhibit 59 is a true and correct copy of the “Trump International Hotel Washington, D.C. 2017 Holiday Season” booklet, as it appeared on the Trump Hotels website [https://www.trumphotels.com/uploads/15062/0/2017\\_trumpdc\\_holidaybooklet.pdf](https://www.trumphotels.com/uploads/15062/0/2017_trumpdc_holidaybooklet.pdf) on May 16, 2018. The menus in the booklet list “Maryland crab soup”, “Maryland crab cake”, “Maryland crab meat”, and “Maryland crab chowder”.

61. Attached hereto as Exhibit 60 is a true and correct copy of the article titled “Donald Trump, José Andrés and the death of a grand Washington restaurant,” published by the Washington Post on April 29, 2016, as it appeared on the website [https://www.washingtonpost.com/news/digger/wp/2016/04/29/donald-trump-jose-andres-and-the-death-of-a-grand-washington-restaurant/?utm\\_term=.0564bfe07e48](https://www.washingtonpost.com/news/digger/wp/2016/04/29/donald-trump-jose-andres-and-the-death-of-a-grand-washington-restaurant/?utm_term=.0564bfe07e48) on May 16, 2018. The article stated, “in the fallout over [a] restaurant deal” between “internationally renowned chef” José Andrés and President Trump that resulted in “the two . . . suing each other,” President Trump “wasted little time in personally seizing the more than \$250,000 Andrés’s company had set aside as collateral at the start of the project.”

62. Attached hereto as Exhibit 61 is a true and correct copy of the article titled “Trump Hotel in Old Post Office set to open in the fall,” published by WTOP on March 21, 2016, as it appeared on the website <https://wtop.com/dc/2016/03/trump-hotel-old-post-office-set->

[open-fall/slide/1/](#) on May 16, 2018. The article stated, “As Trump updated a crush of local and national reporters on the state of his newest hotel, he said he’ll land on Pennsylvania Avenue one way or another . . .”.

63. Attached hereto as Exhibit 62 is a true and correct copy of a screenshot of a television news report entitled “Donald Trump celebrates grand opening of new DC luxury hotel,” broadcast by WTTG (Fox 5) on October 26, 2016, as it appeared on the website <http://www.fox5dc.com/news/donald-trump-to-celebrate-grand-opening-of-new-dc-luxury-hotel> on May 16, 2018.

64. Attached hereto as Exhibit 63 is a true and correct copy of screenshot of a television news report entitled “Trump in D.C. to talk business and politics,” broadcast by WUSA 9 on October 26, 2016, as it appeared on the website <https://www.wusa9.com/article/news/local/trump-in-dc-to-talk-business-and-politics/342432330> on May 16, 2018.

65. Attached hereto as Exhibit 64 is a true and correct copy of the article titled “Trump’s hands-on management style to be tested by presidency,” published by the Associated Press initially on November 26, 2016 and updated on August 28, 2017, as it appeared on the website <https://www.dailynews.com/2016/11/26/trumps-hands-on-management-style-to-be-tested-by-presidency/> on May 16, 2018.

66. Attached hereto as Exhibit 65 is a true and correct copy of the article titled “Tracking who is spending money at President Trump’s D.C. hotel,” published by the Washington Post and most recently updated May 4, 2018, as it appeared on the website [https://www.washingtonpost.com/graphics/2018/politics/trump-hotel-events/?utm\\_term=.fe74b4bdf5e3](https://www.washingtonpost.com/graphics/2018/politics/trump-hotel-events/?utm_term=.fe74b4bdf5e3) on May 16, 2018.

67. Attached hereto as Exhibit 66 is a true and correct copy of the website titled “Embassy Directory 2016,” published by Washington Life Magazine, as it appeared on the website [http://washingtonlife.com/embassy-directory-2016/?name\\_directory\\_startswith](http://washingtonlife.com/embassy-directory-2016/?name_directory_startswith) on May 16, 2018. The website listed the addresses of 23 foreign ambassador residences as located in Maryland.

68. Attached hereto as Exhibit 67 is a true and correct copy of the website titled “Consulados en Estados Unidos,” published by the Embajada de Guatemala en Estados Unidos, as it appeared on the website [http://guatemalaembassyusa.org/te-ayudamos/consulados-en-ee-uu/#consulado\\_silverspring](http://guatemalaembassyusa.org/te-ayudamos/consulados-en-ee-uu/#consulado_silverspring) on May 16, 2018. The website lists a consulate for Guatemala in Silver Spring, Maryland.

69. Attached hereto as Exhibit 68 is a true and correct copy of the website titled “Consulado General de El Salvador Silver Spring – Consulate General of El Salvador in Silver Spring,” published by the Gobierno de El Salvador, as it appeared on the website [http://consuladosilverspring.rree.gob.sv/index.php?option=com\\_content&view=featured&Itemid=101](http://consuladosilverspring.rree.gob.sv/index.php?option=com_content&view=featured&Itemid=101) on May 16, 2018. The website lists the consulate general for El Salvador in Silver Spring, Maryland.

I declare under penalty of perjury that the foregoing is true and correct. Executed on May 17, 2018 at Washington, D.C.

  
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Brandon Brockmyer