

EXHIBIT A

NYS Department of State

Division of Corporations

Entity Information

The information contained in this database is current through September 19, 2016.

Selected Entity Name: THE DONALD J. TRUMP FOUNDATION, INC.

Selected Entity Status Information

Current Entity Name: THE DONALD J. TRUMP FOUNDATION, INC.

DOS ID #: 1145728

Initial DOS Filing Date: FEBRUARY 18, 1987

County: NEW YORK

Jurisdiction: NEW YORK

Entity Type: DOMESTIC NOT-FOR-PROFIT CORPORATION

Current Entity Status: ACTIVE

Selected Entity Address Information

DOS Process (Address to which DOS will mail process if accepted on behalf of the entity)

NATIONAL REGISTERED AGENTS, INC.

111 EIGHTH AVENUE

NEW YORK, NEW YORK, 10011

Registered Agent

NATIONAL REGISTERED AGENTS, INC.

111 EIGHTH AVENUE

NEW YORK, NEW YORK, 10011

This office does not record information regarding the names and addresses of officers, shareholders or directors of nonprofessional corporations except the chief executive officer, if provided, which would be listed above. Professional corporations must include the name(s) and address(es) of the initial officers, directors, and shareholders in the initial certificate of incorporation, however this information is not recorded and only available by viewing the certificate.

***Stock Information**

# of Shares	Type of Stock	\$ Value per Share
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No Information Available

*Stock information is applicable to domestic business corporations.

Name History

Filing Date	Name Type	Entity Name
FEB 18, 1987	Actual	THE DONALD J. TRUMP FOUNDATION, INC.

A **Fictitious** name must be used when the **Actual** name of a foreign entity is unavailable for use in New York State. The entity must use the fictitious name when conducting its activities or business in New York State.

NOTE: New York State does not issue organizational identification numbers.

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EXHIBIT B

Form **990-PF**

Return of Private Foundation

or Section 4947(a)(1) Trust Treated as Private Foundation

OMB No 1545-0052

Department of the Treasury
Internal Revenue Service

- ▶ **Do not enter Social Security numbers on this form as it may be made public. By law, the IRS cannot redact the information on the form.**
▶ **Information about Form 990-PF and its instructions is at www.irs.gov/form990pf.**

2013

Open to Public Inspection

For calendar year 2013, or tax year beginning 01-01-2013 , and ending 12-31-2013

Name of foundation THE DONALD J TRUMP FOUNDATION		A Employer identification number 13-3404773
Number and street (or P.O. box number if mail is not delivered to street address) C/O WEISERMAZARS LLP 60 CROSSWAYS PK DR NO 301	Room/suite	B Telephone number (see instructions) (212) 715-7231
City or town, state or province, country, and ZIP or foreign postal code WOODBURY, NY 11797		C If exemption application is pending, check here <input type="checkbox"/>
G Check all that apply <input type="checkbox"/> Initial return <input type="checkbox"/> Initial return of a former public charity <input type="checkbox"/> Final return <input type="checkbox"/> Amended return <input type="checkbox"/> Address change <input type="checkbox"/> Name change		D 1. Foreign organizations, check here <input type="checkbox"/> 2. Foreign organizations meeting the 85% test, check here and attach computation <input type="checkbox"/>
H Check type of organization <input checked="" type="checkbox"/> Section 501(c)(3) exempt private foundation <input type="checkbox"/> Section 4947(a)(1) nonexempt charitable trust <input type="checkbox"/> Other taxable private foundation		E If private foundation status was terminated under section 507(b)(1)(A), check here <input type="checkbox"/>
I Fair market value of all assets at end of year (from Part II, col. (c), line 16) \$ 1,369,746	J Accounting method <input type="checkbox"/> Cash <input checked="" type="checkbox"/> Accrual <input type="checkbox"/> Other (specify) _____ (Part I, column (d) must be on cash basis.)	F If the foundation is in a 60-month termination under section 507(b)(1)(B), check here <input type="checkbox"/>

Part I Analysis of Revenue and Expenses <small>(The total of amounts in columns (b), (c), and (d) may not necessarily equal the amounts in column (a) (see instructions))</small>		(a) Revenue and expenses per books	(b) Net investment income	(c) Adjusted net income	(d) Disbursements for charitable purposes (cash basis only)
Revenue	1 Contributions, gifts, grants, etc., received (attach schedule)	565,832			
	2 Check <input type="checkbox"/> if the foundation is not required to attach Sch B				
	3 Interest on savings and temporary cash investments	4,033	4,033		
	4 Dividends and interest from securities				
	5a Gross rents				
	b Net rental income or (loss)				
	6a Net gain or (loss) from sale of assets not on line 10				
	b Gross sales price for all assets on line 6a				
	7 Capital gain net income (from Part IV, line 2)		0		
	8 Net short-term capital gain				
	9 Income modifications				
	10a Gross sales less returns and allowances				
b Less Cost of goods sold					
c Gross profit or (loss) (attach schedule)					
11 Other income (attach schedule)					
12 Total. Add lines 1 through 11	569,865	4,033			
Operating and Administrative Expenses	13 Compensation of officers, directors, trustees, etc	0	0		0
	14 Other employee salaries and wages				
	15 Pension plans, employee benefits				
	16a Legal fees (attach schedule)				
	b Accounting fees (attach schedule)	5,000	0		5,000
	c Other professional fees (attach schedule)	55	0		55
	17 Interest				
	18 Taxes (attach schedule) (see instructions)				
	19 Depreciation (attach schedule) and depletion				
	20 Occupancy				
	21 Travel, conferences, and meetings				
	22 Printing and publications				
	23 Other expenses (attach schedule)	250	0		250
	24 Total operating and administrative expenses. Add lines 13 through 23	5,305	0		5,305
	25 Contributions, gifts, grants paid	913,075			913,075
26 Total expenses and disbursements. Add lines 24 and 25	918,380	0		918,380	
27 Subtract line 26 from line 12					
a Excess of revenue over expenses and disbursements	-348,515				
b Net investment income (if negative, enter -0-)		4,033			
c Adjusted net income (if negative, enter -0-)					

Part VII-B Statements Regarding Activities for Which Form 4720 May Be Required (continued)

5a During the year did the foundation pay or incur any amount to

(1) Carry on propaganda, or otherwise attempt to influence legislation (section 4945(e))? ☐ Yes ☒ No

(2) Influence the outcome of any specific public election (see section 4955), or to carry on, directly or indirectly, any voter registration drive? ☐ Yes ☒ No

(3) Provide a grant to an individual for travel, study, or other similar purposes? ☐ Yes ☒ No

(4) Provide a grant to an organization other than a charitable, etc., organization described in section 509(a)(1), (2), or (3), or section 4940(d)(2)? (see instructions). ☐ Yes ☒ No

(5) Provide for any purpose other than religious, charitable, scientific, literary, or educational purposes, or for the prevention of cruelty to children or animals? ☐ Yes ☒ No

b If any answer is "Yes" to 5a(1)–(5), did **any** of the transactions fail to qualify under the exceptions described in Regulations section 53.4945 or in a current notice regarding disaster assistance (see instructions)? ☐ Yes ☒ No

Organizations relying on a current notice regarding disaster assistance check here. ☐ Yes ☒ No

c If the answer is "Yes" to question 5a(4), does the foundation claim exemption from the tax because it maintained expenditure responsibility for the grant? ☐ Yes ☒ No

If "Yes," attach the statement required by Regulations section 53.4945–5(d).

6a Did the foundation, during the year, receive any funds, directly or indirectly, to pay premiums on a personal benefit contract? ☐ Yes ☒ No

b Did the foundation, during the year, pay premiums, directly or indirectly, on a personal benefit contract? ☐ Yes ☒ No

If "Yes" to 6b, file Form 8870.

7a At any time during the tax year, was the foundation a party to a prohibited tax shelter transaction? ☐ Yes ☒ No

b If yes, did the foundation receive any proceeds or have any net income attributable to the transaction? ☐ Yes ☒ No

Part VIII Information About Officers, Directors, Trustees, Foundation Managers, Highly Paid Employees, and Contractors

1 List all officers, directors, trustees, foundation managers and their compensation (see instructions).

(a) Name and address	(b) Title, and average hours per week devoted to position	(c) Compensation (If not paid, enter -0-)	(d) Contributions to employee benefit plans and deferred compensation	(e) Expense account, other allowances
See Additional Data Table				

2 Compensation of five highest-paid employees (other than those included on line 1—see instructions). If none, enter "NONE."

(a) Name and address of each employee paid more than \$50,000	(b) Title, and average hours per week devoted to position	(c) Compensation	(d) Contributions to employee benefit plans and deferred compensation	(e) Expense account, other allowances
NONE				

Total number of other employees paid over \$50,000. ☐ 0

Form 990PF Part VIII Line 1 - List all officers, directors, trustees, foundation managers and their compensation

(a) Name and address	(b) Title, and average hours per week devoted to position	(c) Compensation (If not paid, enter -0-)	(d) Contributions to employee benefit plans and deferred compensation	(e) Expense account, other allowances
DONALD J TRUMP C/O TRUMP ORGANIZATION 725 5TH AVE NEW YORK, NY 10022	PRESIDENT 0 00	0	0	0
ALLEN WEISSELBERG C/O TRUMP ORGANIZATION 725 5TH AVE NEW YORK, NY 10022	TREASURER 0 00	0	0	0
DONALD J TRUMP JR C/O TRUMP ORGANIZATION 725 5TH AVE NEW YORK, NY 10022	DIRECTOR 0 00	0	0	0
ERIC F TRUMP C/O TRUMP ORGANIZATION 725 5TH AVE NEW YORK, NY 10022	DIRECTOR 0 00	0	0	0
IVANKA M TRUMP C/O TRUMP ORGANIZATION 725 5TH AVE NEW YORK, NY 10022	DIRECTOR 0 00	0	0	0

Form 990PF Part XV Line 3 - Grants and Contributions Paid During the Year or Approved for Future Payment

Recipient	If recipient is an individual, show any relationship to any foundation manager or substantial contributor	Foundation status of recipient	Purpose of grant or contribution	Amount
Name and address (home or business)				
a Paid during the year				
CROHN'S & COLITIS FOUNDATION OF AMERICA INC 733 THIRD AVE SUITE 510 NEWYORK,NY 10017			GENERAL	5,000
DAMON RUNYON CANCER RESEARCH FOUNDATION ONE EXCHANGE PLAZA 55 BROADWAY SUITE 302 NEWYORK,NY 10006			GENERAL	10,000
DC PRESERVATION LEAGUE 1221 CONNECTICUT AVENUE NW SUITE 5A WASHINGTON,DC 20036			GENERAL	5,000
DEBRA GEORGE MINISTRIES PO BOX 721 STAFFORD,TX 774970721			GENERAL	10,000
DISCOVERY ELEMENTARY SCHOOL PTO 44020 GRACE BRIDGE DRIVE ASHBURN,VA 20147			GENERAL	7,500
ETA PI CHAPTER FOUNDATION INC PO BOX 459 MONTCLAIR,NJ 07042			GENERAL	1,000
FIDELITY INVESTMENTS CHARITABLE GIFT FUND 200 SEAPORT BOULEVARD MAIL ZONE Z3B BOSTON,MA 02210			GENERAL	115,000
FRIENDS OF GERMAN AMERICAN HALL OF FAME INC 1435 BAY BLVD ATLANTIC BEACH,NY 115091604			GENERAL	1,000
FRIENDS OF VETERANS INC 222 HOLIDAY DRIVE SUITE 20 WHITE RIVER JCT,VT 05001			GENERAL	1,000
GLOBAL MEDICAL REFIEF FUND 112 MACFARLAND AVE STATEN ISLAND,NY 10305			GENERAL	2,500
JAMES WHITCOMB RILEY MEMORIAL ASSOCIATION 30 S MERIDIAN STE 200 INDIANAPOLIS,IN 46204			GENERAL	250
JOE TORRRE SAFE AT HOME FOUNDATION PO BOX 1037 MIDTOWN STATION NEWYORK,NY 10018			GENERAL	5,000
JULIE'S JUNGLE 5 LIME KILN RD HOPEWELL JUNCTION,NY 12533			GENERAL	12,500
JUSTICE FOR ALL 113 N MARTINSON ST WICHITA,KS 67203			GENERAL	25,000
LEADERS IN FURTHERING EDUCATION 1720S OCEAN BLVD MANALAPAN,FL 33462			GENERAL	6,000
Total			3a	913,075

EXHIBIT C

Form **990-PF**Department of the Treasury
Internal Revenue Service**Return of Private Foundation
or Section 4947(a)(1) Nonexempt Charitable Trust
Treated as a Private Foundation****Note.** The foundation may be able to use a copy of this return to satisfy state reporting requirements

OMB No 1545-0052

2012**Open to Public
Inspection****For calendar year 2012, or tax year beginning 01-01-2012 , and ending 12-31-2012**

Name of foundation THE DONALD J TRUMP FOUNDATION		A Employer identification number 13-3404773							
Number and street (or P O box number if mail is not delivered to street address) Room/suite C/O WEISERMAZARS LLP 60 CROSSWAYS PK DR NO 301		B Telephone number (see instructions) (212) 715-7231							
City or town, state, and ZIP code WOODBURY, NY 11797		C If exemption application is pending, check here <input type="checkbox"/>							
G Check all that apply: <table border="0"> <tr> <td><input type="checkbox"/> Initial return</td> <td><input type="checkbox"/> Initial return of a former public charity</td> </tr> <tr> <td><input type="checkbox"/> Final return</td> <td><input type="checkbox"/> Amended return</td> </tr> <tr> <td><input type="checkbox"/> Address change</td> <td><input type="checkbox"/> Name change</td> </tr> </table>		<input type="checkbox"/> Initial return	<input type="checkbox"/> Initial return of a former public charity	<input type="checkbox"/> Final return	<input type="checkbox"/> Amended return	<input type="checkbox"/> Address change	<input type="checkbox"/> Name change	D 1. Foreign organizations, check here <input type="checkbox"/> 2. Foreign organizations meeting the 85% test, check here and attach computation <input type="checkbox"/>	
<input type="checkbox"/> Initial return	<input type="checkbox"/> Initial return of a former public charity								
<input type="checkbox"/> Final return	<input type="checkbox"/> Amended return								
<input type="checkbox"/> Address change	<input type="checkbox"/> Name change								
H Check type of organization: <table border="0"> <tr> <td><input checked="" type="checkbox"/> Section 501(c)(3) exempt private foundation</td> <td><input type="checkbox"/> Other taxable private foundation</td> </tr> <tr> <td><input type="checkbox"/> Section 4947(a)(1) nonexempt charitable trust</td> <td></td> </tr> </table>		<input checked="" type="checkbox"/> Section 501(c)(3) exempt private foundation	<input type="checkbox"/> Other taxable private foundation	<input type="checkbox"/> Section 4947(a)(1) nonexempt charitable trust		E If private foundation status was terminated under section 507(b)(1)(A), check here <input type="checkbox"/>			
<input checked="" type="checkbox"/> Section 501(c)(3) exempt private foundation	<input type="checkbox"/> Other taxable private foundation								
<input type="checkbox"/> Section 4947(a)(1) nonexempt charitable trust									
I Fair market value of all assets at end of year (from Part II, col. (c), line 16) \$ 1,718,511		F If the foundation is in a 60-month termination under section 507(b)(1)(B), check here <input type="checkbox"/>							
J Accounting method: <table border="0"> <tr> <td><input type="checkbox"/> Cash</td> <td><input checked="" type="checkbox"/> Accrual</td> </tr> <tr> <td colspan="2"><input type="checkbox"/> Other (specify) _____</td> </tr> </table> (Part I, column (d) must be on cash basis.)		<input type="checkbox"/> Cash	<input checked="" type="checkbox"/> Accrual	<input type="checkbox"/> Other (specify) _____					
<input type="checkbox"/> Cash	<input checked="" type="checkbox"/> Accrual								
<input type="checkbox"/> Other (specify) _____									

Part I Analysis of Revenue and Expenses (The total of amounts in columns (b), (c), and (d) may not necessarily equal the amounts in column (a) (see instructions))		(a) Revenue and expenses per books	(b) Net investment income	(c) Adjusted net income	(d) Disbursements for charitable purposes (cash basis only)
Revenue	1 Contributions, gifts, grants, etc., received (attach schedule)	1,249,746			
	2 Check <input type="checkbox"/> if the foundation is not required to attach Sch. B				
	3 Interest on savings and temporary cash investments	10,105	10,105		
	4 Dividends and interest from securities				
	5a Gross rents				
	b Net rental income or (loss)				
	6a Net gain or (loss) from sale of assets not on line 10				
	b Gross sales price for all assets on line 6a				
	7 Capital gain net income (from Part IV, line 2)		0		
	8 Net short-term capital gain				
	9 Income modifications				
	10a Gross sales less returns and allowances				
b Less Cost of goods sold					
c Gross profit or (loss) (attach schedule)					
11 Other income (attach schedule)					
12 Total. Add lines 1 through 11	1,259,851	10,105			
Operating and Administrative Expenses	13 Compensation of officers, directors, trustees, etc	0	0		0
	14 Other employee salaries and wages				
	15 Pension plans, employee benefits				
	16a Legal fees (attach schedule)				
	b Accounting fees (attach schedule)	5,000	0		5,000
	c Other professional fees (attach schedule)	55	0		55
	17 Interest				
	18 Taxes (attach schedule) (see instructions)				
	19 Depreciation (attach schedule) and depletion				
	20 Occupancy				
	21 Travel, conferences, and meetings				
	22 Printing and publications				
	23 Other expenses (attach schedule)	250	0		250
	24 Total operating and administrative expenses. Add lines 13 through 23	5,305	0		5,305
	25 Contributions, gifts, grants paid	1,712,089			1,712,089
26 Total expenses and disbursements. Add lines 24 and 25	1,717,394	0		1,717,394	
27 Subtract line 26 from line 12					
a Excess of revenue over expenses and disbursements	-457,543				
b Net investment income (if negative, enter -0-)		10,105			
c Adjusted net income (if negative, enter -0-)					

Form 990PF Part XV Line 3 - Grants and Contributions Paid During the Year or Approved for Future Payment

Recipient Name and address (home or business)	If recipient is an individual, show any relationship to any foundation manager or substantial contributor	Foundation status of recipient	Purpose of grant or contribution	Amount
a Paid during the year				
JEWISH COMMUNITY RELATIONS COUNCIL OF NEW YORK 225 WEST 34TH STREET SUITE 1607 NEW YORK, NY 10122			GENERAL	5,000
LATINO COMMISSION ON AIDS INC 24 WEST 25TH STREET 9TH FLOOR NEW YORK, NY 10010			GENERAL	10,000
LEUKEMIA AND LYMPHOMA SOCIETY 1311 MAMARONECK AVE SUITE 310 WHITE PLAINS, NY 10605			GENERAL	6,000
LIFESTEPS 5839 GREEN VALLEY CIRCLE SUITE 204 CULVER CITY, CA 902306963			GENERAL	1,000
LONG ISLAND SLED HOCKEY INC 33 HARDING AVE LYNBROOK, NY 11563			GENERAL	1,000
MAGIC JOHNSON FOUNDATION INC 9100 WILSHIRE BLVD EAST TOWER SUITE 700 BEVERLY HILLS, CA 90212			GENERAL	10,000
MARTIN B GREENBERG FOUNDATION 1 N END AVENUE NEW YORK, NY 10282			GENERAL	158,000
METROPOLITAN GOLF ASSOCIATION 49 KNOLLWOOD ROAD ELMSFORD, NY 10523			GENERAL	2,000
MICHAEL J FOX FOUNDATION GRAND CENTRAL STATION PO BOX 4777 NEW YORK, NY 101634777			GENERAL	10,000
MONTEFIORE HOSPITAL AND MEDICAL CENTER 111 EAST 210TH STREET BRONX, NY 10467			GENERAL	1,000
MORSELIFE 4847 FRED GLADSTONE DRIVE WEST PALM BEACH, FL 33417			GENERAL	25,000
MUSEUM OF JEWISH HERITAGE 36 BATTERY PL NEW YORK, NY 10280			GENERAL	100,000
NATIONAL INCLUSION PROJECT INC 104 TWALEXANDER DR BUILDING 1 PO BOX 110104 RTP, NC 27709			GENERAL	10,000
NATIONAL MULTIPLE SCLEROSIS SOCIETY 733 THIRD AVE 3RD FLOOR NEW YORK, NY 10017			GENERAL	5,000
NEPHCURE FOUNDATION 15 WATERLOO AVENUE BERWYN, PA 19312			GENERAL	10,000

Form 990PF Part XV Line 3 - Grants and Contributions Paid During the Year or Approved for Future Payment

Recipient Name and address (home or business)	If recipient is an individual, show any relationship to any foundation manager or substantial contributor	Foundation status of recipient	Purpose of grant or contribution	Amount
a Paid during the year				
SUSAN G KOMEN BREAST CANCER FOUNDATION INC 5005 LBJ FREEWAY SUITE 250 DALLAS, TX 75244			GENERAL	56,939
THE DRUMTHWACKET FOUNDATION 354 STOCKTON ST PRINCETON, NJ 08540			GENERAL	10,000
THE INSTITUTE OF JEWISH HUMANITIES 1197 E 17TH STREET BROOKLYN, NY 11230			GENERAL	3,750
THE NAT MOORE FOUNDATION 16911 NE 6TH AVENUE N MIAMI BEACH, FL 33162			GENERAL	10,000
THE NEW YORK JETS FOUNDATION ONE JETS DRIVE FLORHAM PARK, NY 10028			GENERAL	10,000
THE NICKLAUS CHILDREN'S HEALTH CARE FOUNDATION GOLDEN BEAR PLAZA EAST TOWER SUITE 303 11770 US HIGHWAY ONE NORTH PALM BEACH, FL 33408			GENERAL	25,000
THE PALM BEACH POLICE FOUNDATION 139 N COUNTRY ROAD - SUITE 20C PALM BEACH, FL 33480			GENERAL	50,000
THE RAMP CHURCH 2220 MEMORIAL AVE LYNCHBURG, VA 24501			GENERAL	1,000
THE ROSE BRUCIA EDUCATIONAL FOUNDATION 1377 MOTOR PARKWAY SUITE 212 ISLANDIA, NY 11749			GENERAL	10,000
THE SKYSCRAPER MUSEUM 39 BATTERY PLACE NEW YORK, NY 10280			GENERAL	1,000
THE TED HENDRICKS FOUNDATION PO BOX 7470 BUFFALO GROVE, IL 60089			GENERAL	2,500
THE UCLA FOUNDATION 10920 WILSHIRE BOULEVARD SUITE 900 LOS ANGELES, CA 90024			GENERAL	5,000
THROGS NECK COMMUNITY SERVICES INC 1461 WILLIAM PL BRONX, NY 10461			GENERAL	2,000
TIGER WOODS FOUNDATION 121 INNOVATION DRIVE SUITE 150 IRVINE, CA 92617			GENERAL	10,000
UJA FEDERATION 130 EAST 59TH STREET NEW YORK, NY 10022			GENERAL	25,000

EXHIBIT D

Trump used \$258,000 from his charity to settle legal problems

By David A. Fahrenthold September 20 at 10:26 AM

Donald Trump spent more than a quarter-million dollars from his charitable foundation to settle lawsuits that involved the billionaire's for-profit businesses, according to interviews and a review of legal documents.

Those cases, which together used \$258,000 from Trump's charity, were among four newly documented expenditures in which Trump may have violated laws against "self-dealing" — which prohibit nonprofit leaders from using charity money to benefit themselves or their businesses.

In one case, from 2007, Trump's Mar-a-Lago Club faced \$120,000 in unpaid fines from the town of Palm Beach, Fla., resulting from a dispute over the size of a flagpole.

In a settlement, Palm Beach agreed to waive those fines — if Trump's club made a \$100,000 donation to a specific charity for veterans. Instead, Trump sent a check from the Donald J. Trump Foundation, a charity funded almost entirely by other people's money, according to tax records.

In another case, court papers say one of Trump's golf courses in New York agreed to settle a lawsuit by making a donation to the plaintiff's chosen charity. A \$158,000 donation was made by the Trump Foundation, according to tax records.

The other expenditures involved smaller amounts. In 2013, Trump used \$5,000 from the foundation to buy advertisements touting his chain of hotels in programs for three events organized by a D.C. preservation group. And in 2014, Trump spent \$10,000 of the foundation's money for a portrait of himself bought at a charity fundraiser.

Or, rather, another portrait of himself.

Several years earlier, Trump had used \$20,000 from the Trump Foundation to buy a different, six foot-tall portrait.

If the Internal Revenue Service were to find that Trump violated self-dealing rules, the agency could require him to pay penalty taxes or to reimburse the foundation for all the money it spent on his behalf. Trump is also facing scrutiny from the office of the New York attorney general, which is examining whether the foundation broke state charity laws.

More broadly, these cases also provide new evidence that Trump ran his charity in a way that may have violated U.S. tax law and gone against the moral conventions of philanthropy.

“I represent 700 nonprofits a year, and I’ve never encountered anything so brazen,” said Jeffrey Tenenbaum, who advises charities at the Venable law firm in Washington. After The Post described the details of these Trump Foundation gifts, Tenenbaum described them as “really shocking.”

“If he’s using other people’s money — run through his foundation — to satisfy his personal obligations, then that’s about as blatant an example of self-dealing [as] I’ve seen in a while,” Tenenbaum said.

The Post sent the Trump campaign a detailed list of questions about the four cases, but received no response.

The New York attorney general’s office declined to comment when asked whether its inquiry would cover these new cases of possible self-dealing.

Trump founded his charity in 1987 and, for years, was its only donor. But in 2006, Trump gave away almost all of the money he had donated to the foundation, leaving it with just \$4,238 at year’s end, according to tax records.

Then, he transformed the Trump Foundation into something rarely seen in the world of philanthropy: a name-branded foundation, whose namesake provides none of its money. Trump gave relatively small donations in 2007 and 2008, and afterward: nothing. The foundation’s tax records show no donations from Trump since 2009.

Its money has come from other donors, most notably pro-wrestling executives Vince and Linda McMahon, who gave a total of \$5 million from 2007 to 2009, tax records show. Trump remains the foundation’s president, and he told the IRS in his latest public filings that he works half an hour per week on the charity.

The Post has previously detailed other cases in which Trump used the charity’s money in a way that appeared to violate the law.

In 2013, for instance, the foundation gave \$25,000 to a political group supporting Florida Attorney General Pam Bondi (R). That gift was made around the same time that Bondi’s office was considering whether to investigate fraud allegations against Trump University. It didn’t.

Tax laws say nonprofits such as the Trump Foundation may not make political gifts. Trump staffers blamed the gift on a clerical error. After The Post reported on the gift to Bondi’s group this spring, Trump paid a \$2,500 penalty tax and reimbursed the Trump Foundation for the \$25,000 donation.

In other instances, it appeared that Trump may have violated rules against self-dealing.

In 2012, for instance, Trump spent \$12,000 of the foundation's money to buy a football helmet signed by NFL quarterback Tim Tebow.

And in 2007, Trump's wife, Melania, bid \$20,000 for the six-foot-tall portrait of Trump, done by a "speed painter" during a charity gala at Mar-a-Lago. Later, Trump paid for the painting with \$20,000 from the foundation.

In those cases, tax experts said, Trump was not allowed to simply keep these items and display them in a home or business. They had to be put to a charitable use.

Trump's campaign has not responded to questions about what became of the helmet or the portrait.

The four new cases of possible self-dealing were discovered in the Trump Foundation's tax filings. While Trump has refused to release his personal tax returns, the foundation's filings are required to be public.

The case involving the flagpole at Trump's oceanfront Mar-a-Lago Club began in 2006, when the club put up a giant American flag on the 80-foot pole. Town rules said flagpoles should be 42 feet high at most. Trump's contention, according to news reports, was: "You don't need a permit to put up the American flag."

The town began to fine Trump, \$1,250 a day.

Trump's club sued in federal court, saying that a smaller flag "would fail to appropriately express the magnitude of Donald J. Trump's . . . patriotism."

They settled.

The town waived the \$120,000 in fines. In September 2007, Trump wrote the town a letter, saying he had done his part as well.

"I have sent a check for \$100,000 to Fisher House," he wrote. The town had chosen Fisher House, which runs a network of comfort homes for the families of veterans and military personnel receiving medical treatment, as the recipient of the money. Trump added that, for good measure, "I have sent a check for \$25,000" to another charity, the American Veterans Disabled for Life Memorial.

Trump provided the town with copies of the checks, which show that they came from the Trump Foundation.

In the town of Palm Beach, nobody seems to have objected that the fines assessed on Trump's business were being erased by a donation from a charity.

"I don't know that there was any attention paid to that at the time. We just saw two checks signed by Donald J. Trump," said John Randolph, the Palm Beach town attorney. "I'm sure we were satisfied with it."

In the other case in which a Trump Foundation payment seemed to help settle a legal dispute, the trouble began with a hole-in-one.

In 2010, a man named Martin Greenberg hit a hole-in-one on the 13th hole while playing in a charity tournament at Trump's course in Westchester County, N.Y.

Greenberg won a \$1 million prize. Briefly.

Later, Greenberg was told that he had won nothing. The prize's rules required that the shot had to go 150 yards. But Trump's course had allegedly made the hole too short.

Greenberg sued.

Eventually, court papers show, Trump's golf course signed off on a settlement that required it to make a donation of Martin Greenberg's choosing. Then, on the day that the parties informed the court they had settled their case, a \$158,000 donation was sent to the Martin Greenberg Foundation.

That money came from the Trump Foundation, according to the tax filings of both Trump's and Greenberg's foundations.

Greenberg's foundation reported getting nothing that year from Trump personally or from his golf club.

Both Greenberg and Trump have declined to comment.

Several tax experts said that the two cases appeared to be clear cases of self-dealing, as defined by the tax code.

The Trump Foundation had made a donation, it seemed, so that a Trump business did not have to.

Rosemary E. Fei, a lawyer in San Francisco who advises nonprofits, said both cases clearly fit the definition of self-dealing.

“Yes, Trump pledged as part of the settlement to make a payment to a charity, and yes, the foundation is writing a check to a charity,” Fei said. “But the obligation was Trump’s. And you can’t have a charitable foundation paying off Trump’s personal obligations. That would be classic self-dealing.”

In another instance, from 2013, the Trump Foundation made a \$5,000 donation to the D.C. Preservation League, according to the group and tax filings. That nonprofit’s support has been helpful for Trump as he has turned the historic Old Post Office Pavilion on Washington’s Pennsylvania Avenue NW into a luxury hotel.

The Trump Foundation’s donation to that group bought a “sponsorship,” which included advertising space in the programs for three big events that drew Washington’s real estate elite. The ads did not mention the foundation or anything related to charity. Instead, they promoted Trump’s hotels, with glamorous photos and a phone number to call to make a reservation.

“The foundation wrote a check that essentially bought advertising for Trump hotels?” asked John Edie, the longtime general counsel for the Council on Foundations, when a Post reporter described this arrangement. “That’s not charity.”

The last of the four newly documented expenditures involves the second painting of Trump, which he bought with charity money.

It happened in 2014, during a gala at Mar-a-Lago that raised money for Unicorn Children’s Foundation — a Florida charity that helps children with developmental and learning disorders.

The gala’s main event was a concert by Jon Secada. But there was also an auction of paintings by Havi Schanz, a Miami Beach-based artist.

One was of Marilyn Monroe. The other was a four foot-tall portrait of Trump: a younger-looking, mid-’90s Trump, painted in acrylic on top of an old architectural drawing.

Trump bought it for \$10,000.

[Sign up](#)

Afterward, Schanz recalled in an email, “he asked me about the painting. I said, ‘I paint souls, and when I had to paint you, I asked your soul to allow me.’ He was touched and smiled.”

A few days later, the charity said, a check came from the Trump Foundation. Trump himself gave nothing, according to Sharon Alexander, the executive director of the charity.

Trump's staff did not respond to questions about where that second painting is now. Alexander said she had last seen it at Trump's club.

"I'm pretty sure we just left it at Mar-a-Lago," she said, "and his staff took care of it."

David A. Fahrenthold covers the 2016 presidential campaign for The Washington Post. He has been at the Post since 2000, and previously covered Congress, the federal bureaucracy, the environment, and the D.C. police. 🐦 Follow @Fahrenthold

Campaign 2016

×

EXHIBIT E



Hole-in-one ace sues for \$1M

By PageSix.com Staff

February 11, 2011 | 5:00am

Former Commodities Exchange chairman **Martin Greenberg** is suing former NBA star **Alonzo Mourning's** charity after he won \$1 million for hitting a hole-in-one at its golf tournament — then was denied the prize after it was claimed the course had been improperly shortened.

Greenberg hit the hole-in-one at the Alonzo Mourning Charities tournament at **Donald Trump's** National Golf Club in Briarcliff Manor, NY, last August. But the insurer backing the event refused to pay up, claiming Greenberg's required 150-yard shot had actually traveled only 139 yards.

Philanthropist Greenberg last night threw down his 9-iron and filed suit in state Supreme Court against the charity, which helps urban youth, event organizers and Trump's Golf Club. He told us, "This situation should have been a happy and exciting event. It is my intention to use the proceeds for charitable purposes, which makes my being forced into legal action all the more tragic. Sadly, I was left with no choice."

Greenberg is suing for the \$1 million plus legal costs. The founder and CEO of Sterling Commodities Corp. said in court papers that after he aced the 13th hole, Mourning "personally congratulated" him. But an hour later, he was "summoned to the course" to meet with a rep for the insurers to identify the spot from which he hit his tee shot. They then "denied coverage" and have "refused to make any payments for the prize."

Underwriter Odds on Promotions president **Mark Gilmartin** previously told us the hole-in-one had to be 150 yards to win the prize — but videotape showed it was short.

AM Charities CEO **Vincent L. Dimmock** said, "We help deliver positive change to high-risk kids in need, who stand to lose the most from this unfortunate lawsuit."

A source close to the Trump Organizaion said, "We had nothing to do with the matter other than they chose to use our course." The source added that Trump offered to play a round of 18 holes at Briarcliff with Greenberg, and if Greenberg won, Trump would pay him \$1 million in cash on the spot. If Greenberg lost, he'd have to pay Trump \$100,000. He didn't take up the offer.

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EXHIBIT F

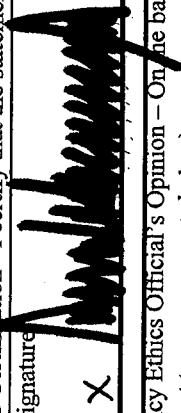
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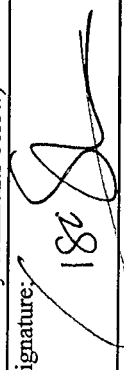
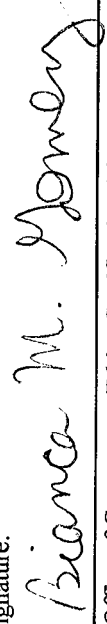
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Executive Branch Personnel Public Financial Disclosure Report (OGE Form 278e)

UNITED STATES OFFICE OF
GOVERNMENT ETHICS
★
Preventing Conflicts of Interest
in the Executive Branch

Filer's Information	
Last Name	First Name
Trump	Donald
MI	J
Position	President of the United States of America
Agency	
Other Federal Government Positions Held During the Preceding 12 Months:	
N/A	
Name of Congressional Committee Considering Nomination (Nominees only):	
N/A	
Filer's Certification - I certify that the statements I have made in this report are true, complete and correct to the best of my knowledge:	
Signature	Date:
	7-15-2015

Agency Ethics Official's Opinion - On the basis of information contained in this report, I conclude that the filer is in compliance with applicable laws and regulations (subject to any comments below)	
Signature:	Date:
	7/22/2015
Other Review Conducted By:	
Signature:	Date:
	7/21/2015
U.S. Office of Government Ethics Certification (if required):	
Signature:	Date:

Comments of Reviewing Officials:
Reviewed for Apparent Compliance with the Federal Election Campaign Act



Instructions for Part 1

Note: This is a public form. Do not include account numbers, street addresses, or family member names. See instructions for required information.

Filer's Name

Donald J. Trump

Part 1: Filer's Positions Held Outside United States Government

Organization Name		City/State	Organization Type	Position Held	From	To
Helicopter Air Services, Inc.		New York, NY	Corporation	President	08/16/88	To Date
Highlander Hall, Inc.		New York, NY	Corporation	Director/Vice President	08/01/89	To Date
Hudson Waterfront Associates I, L.P.		New York, NY	Partnership	Partner	11/30/84	To Date
Hudson Waterfront Associates II, L.P.		New York, NY	Partnership	Partner	11/30/84	To Date
Hudson Waterfront Associates III, L.P.		New York, NY	Partnership	Partner	11/30/84	To Date
Hudson Waterfront Associates IV, L.P.		New York, NY	Partnership	Partner	11/30/84	To Date
Hudson Waterfront Associates V, L.P.		New York, NY	Partnership	Partner	11/30/84	To Date
Hudson Waterfront Associates, L.P.		New York, NY	Partnership	Partner	11/30/84	To Date
Identity Theft Productions LLC		New York, NY	LLC	Member/President	05/30/84	To Date
Indian Hills Holdings LLC #1/Indian Hills Development LLC		New York, NY	Corporation	President/Director	04/02/09	5/1/2014
Jupiter Golf Club LLC		New York, NY	LLC	Member/President	04/02/09	5/1/2014
Jupiter Golf Club Managing Member Corp		New York, NY	LLC	President	2/5/1998 & 8/2000	To Date
Lannington Family Holdings LLC		New York, NY	LLC	President/Director/Chairman	09/28/12	To Date
Lawrence Towers Apartments LLC		New York, NY	LLC	President/Member	7/7/2011 & 7/6/2011	To Date
LFB Acquisition LLC		New York, NY	LLC	Member	11/22/05	To Date
Mar A Lago Club, Inc.		New York, NY	Corporation	President	09/29/02	To Date
Mar A Lago Club, L.L.C.		Palm Beach, Florida	Corporation	President/Director/Chairman	11/09/11	To Date
Midland Associates		New York, NY	LLC	President/Treasurer/Secretary	04/16/96	To Date
Miss Universe L.P., L.L.P. (Formerly Trump Pageants, L.P.)		New York, NY	Partnership	Member/President	01/14/10	To Date
Nitto World Co., Limited		New York, NY	Partnership	Partner	08/15/88	To Date
Ocean Development Member Inc.		Turnberry, Scotland	Foreign Entity	Director	October, 1998	To Date
OPO Hotel Manager LLC		New York, NY	Corporation	President/Director	06/11/14	To Date
OPO Hotel Manager Member Corp		New York, NY	LLC	Member	03/08/07	To Date
OWO Developer LLC		New York, NY	LLC	President	08/12/13	To Date
Panama Ocean Club Management LLC		New York, NY	LLC	Director/Chairman/President	08/12/13	To Date
Panama Ocean Club Management Member Corp		New York, NY	LLC	President/Member	11/05/14	To Date
Paramount RPV Holdings LLC		New York, NY	LLC	Member/President	08/05/10	To Date
Paramount RPV Holdings Manager Corp		New York, NY	LLC	Member/President	11/7/2011 & 1/3/13	To Date
Pine Hill Development Managing Member Corp		New York, NY	Partnership	President/Director/Chairman	01/03/13	To Date
Pine Hill Development LLC		New York, NY	Partnership	President/Director/Secretary	08/01/89	To Date
Pine Hill Development LLC		New York, NY	Partnership	Director & Chairman/President	06/24/89	To Date
Poker Ventures LLC		New York, NY	LLC	President	4/19/14 & 4/15/14 & 4/15/14	To Date
Poker Ventures Managing Member Corp		New York, NY	LLC	President	04/15/14	To Date
Reg Tru Equities, LTD.		New York, NY	LLC	Member/President	10/22/86	To Date
RPV Development LLC		New York, NY	Corporation	Director/President/Chairman	03/19/12	To Date
Scotland Acquisitions LLC		New York, NY	LLC	Director/President/Secretary/Treasurer	03/19/12	To Date
Sentient Jets LLC (Now/known/As Trump Jets LLC)		New York, NY	LLC	Member/President	8/7/80 & 8/28/77	To Date
Sentient Jets Member Corp		New York, NY	LLC	Member/President	08/06/02	To Date
Seven Springs LLC		New York, NY	LLC	Member	03/21/06	To Date
Shore Haven Management Corp		New York, NY	LLC	President/Director	09/25/08	To Date
Shore Haven Apple, Inc.		New York, NY	LLC	President	Dec. 1985	To Date
Shore Haven Shopping Center LLC		New York, NY	LLC	Director/Vice President	08/01/89	To Date
SLC Turnberry Limited		Turnberry, Scotland	Foreign Entity	Member	08/01/89	To Date
				Director/Chairman	11/22/85	To Date

Instructions for Part 1
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Filer's Name		Page Number				
Donald J. Trump		10 of 48				
Note: This is a public form. Do not include account numbers, street addresses, or family member names. See instructions for required information.						
Part 1: Filer's Positions Held Outside United States Government						
#	Organization Name	City/State	Organization Type	Position Held	From	To
386	Trump Marks Punta del Este Manager Corp	New York, NY	Corporation	President/Director/Chairman	01/05/12	To Date
387	The Donald J. Trump Company LLC	New York, NY	LLC	Manager	04/07/14	To Date
388	The Trump Marks Real Estate Corp	New York, NY	Corporation	Chairman/Director & President	02/23/07	To Date
389	Trump Marks Real Estate LLC	New York, NY	LLC	President/Member	08/01/07	To Date
390	Trump Marks SOHO License Corp	New York, NY	Corporation	President/Chairman/Director	08/11/07	To Date
391	Trump Marks SOHO LLC	New York, NY	LLC	President/Member	08/11/07	To Date
392	Trump Marks South Africa LLC	New York, NY	LLC	President/Member	10/01/09	To Date
393	Trump Marks South Africa Member Corp.	New York, NY	Corporation	Member	09/15/08	11/17/2014
394	Trump Marks Stamford Corp	New York, NY	Corporation	Director/President	08/13/07	To Date
395	Trump Marks Stamford LLC	New York, NY	LLC	President/Member	08/13/07	To Date
396	Trump Marks Sunny Isles I LLC	New York, NY	LLC	President/Member	11/06/07	To Date
397	Trump Marks Sunny Isles I Member Corp.	New York, NY	Corporation	Director/President	11/06/07	To Date
398	Trump Marks Sunny Isles II LLC	New York, NY	LLC	President/Member	11/06/07	To Date
399	Trump Marks Sunny Isles II Member Corp.	New York, NY	Corporation	Director/President	11/06/07	To Date
400	Trump Marks Tampa Corp	New York, NY	Corporation	Director/President	10/26/07	To Date
401	Trump Marks Tampa LLC	New York, NY	LLC	President/Member	10/26/07	To Date
402	Trump Marks Toronto Corp	New York, NY	Corporation	Director/President	08/09/07	To Date
403	Trump Marks Toronto LLC	New York, NY	LLC	President/Member	08/09/07	To Date
404	Trump Marks Toronto LP (formally Trump Toronto Management LP)	New York, NY	Partnership	Partner	03/19/08	To Date
405	Trump Marks Walkiki Corp	New York, NY	Corporation	Director/President	04/10/07	To Date
406	Trump Marks Walkiki LLC	New York, NY	LLC	President/Member	04/09/07	To Date
407	Trump Marks Westchester Corp.	New York, NY	Corporation	Director/President	08/13/07	To Date
408	Trump Marks Westchester LLC	New York, NY	LLC	President/Member	08/13/07	To Date
409	Trump Marks White Plains Corp	New York, NY	Corporation	President/Director	06/13/07	To Date
410	Trump Marks White Plains LLC	New York, NY	LLC	President/Member	06/13/07	To Date
411	Trump Miami Resort Management LLC	New York, NY	LLC	President/Member	03/22/12	To Date
412	Trump Miami Resort Management Member Corp	New York, NY	LLC	President/Director/Chairman	03/22/12	To Date
413	Trump National Golf Club Colts Neck LLC	New York, NY	LLC	President/Member	07/10/08	To Date
414	Trump National Golf Club Colts Neck Member Corp	New York, NY	Corporation	President/Director/Chairman	07/10/08	To Date
415	Trump National Golf Club LLC	New York, NY	LLC	President	08/02/00	To Date
416	Trump National Golf Club Member Corp	New York, NY	Corporation	Director/President/Chairman	11/09/11	To Date
417	Trump National Golf Club Washington DC LLC	New York, NY	LLC	President	02/03/09	To Date
418	Trump National Golf Club Washington DC Member Corp.	New York, NY	Corporation	President/Chairman/Director	02/03/09	To Date
419	Trump Ocean Manager Inc.	New York, NY	LLC	President	09/14/06	To Date
420	Trump Ocean Managing Member LLC	New York, NY	LLC	President	08/31/06	To Date
421	Trump Old Post Office LLC	New York, NY	LLC	President/Member	06/30/11	To Date
422	Trump Old Post Office Member Corp.	New York, NY	Corporation	President/Director/Chairman	06/30/11	To Date
423	Trump On the Ocean LLC	New York, NY	LLC	President	9/14/06 & 2/27/2007	To Date
424	Trump Organization LLC	New York, NY	LLC	Chairman and President/Member	2/1/09 & August 2000	To Date
425	The Trump Organization, Inc.	New York, NY	LLC	Chairman and President/Member	05/01/81	To Date
426	Trump Pegasus, Inc.	New York, NY	Corporation	Director & Chairman/President	10/16/96 & 5/1/06	To Date
427	Trump Palace Condominium	New York, NY	Condominium Association	President	03/27/81	To Date
428	Trump Palace/Parc LLC	New York, NY	LLC	Member	10/01/96	To Date
429	Trump Panama Condominium Management LLC	New York, NY	LLC	President/Member	12/13/10	To Date
430	Trump Panama Condominium Member Corp	New York, NY	Corporation	President/Director/Chairman	12/13/10	To Date
431	Trump Panama Hotel Management LLC	New York, NY	LLC	Member	08/05/10	To Date
432	Trump Panama Hotel Management Member Corp	New York, NY	Corporation	President/Director/Chairman	08/05/10	To Date
433	Trump Parc East Condominium	New York, NY	Condominium Association	President	04/30/98	To Date

Instructions for Part 2

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Filer's Name	Page Number
Donald J. Trump	A12 of 44

Reference # **Part 2: Filer's Employment Assets and Income - Part 2 - EXHIBIT A (ATTACHED SCHEDULE)**

	100	LFB ACQUISITION LLC	Member
121 <u>Lawrence Towers Apartments LLC</u>			
Owned by :	<u>% Ownership</u>	<u>Name</u>	<u>Role</u>
	25	Donald J. Trump	Member
	75	Trump Family Members	Member
122 <u>LFB ACQUISITION LLC</u>			
Owned by :	<u>% Ownership</u>	<u>Name</u>	<u>Role</u>
	1	LFB ACQUISITION MEMBER CORP	Managing Member
Has ownership interest in :	<u>% Ownership</u>	<u>Title</u>	
	99	DJT HOLDINGS LLC	Member
	<u>Entity Name</u>	<u>Ownership</u>	
	TRUMP NATIONAL GOLF CLUB -	100.00%	Member
	BEDMINSTER		
123 <u>LFB ACQUISITION MEMBER CORP</u>			
Owned by :	<u>% Ownership</u>	<u>Name</u>	<u>Role</u>
	100	Trump, Donald J.	Shareholder
Has ownership interest in :	<u>Entity Name</u>	<u>Ownership</u>	<u>Title</u>
	LFB ACQUISITION LLC	1.00%	Managing Member
124 <u>MALC, Inc.</u>			
Owned by :	<u>% Ownership</u>	<u>Name</u>	<u>Role</u>
	100	MAR-A-LAGO CLUB INC	Shareholder
125 <u>MAR-A-LAGO CLUB INC</u>			
Owned by :	<u>% Ownership</u>	<u>Name</u>	<u>Role</u>
	100	Trump, Donald J.	Shareholder
Has ownership interest in :	<u>Entity Name</u>	<u>Ownership</u>	<u>Title</u>
	MAR-A-LAGO CLUB, L.L.C.	0.01%	Member
	MALC, Inc.	100.00%	Shareholder
126 <u>MAR-A-LAGO CLUB, L.L.C.</u>			
Assumed Names :	<u>D/B/A</u>		
	MAR-A-LAGO CLUB, L.L.C., L.C.		
Owned by :	<u>% Ownership</u>	<u>Name</u>	<u>Role</u>
	0.01	MAR-A-LAGO CLUB INC	Member
	99.99	Trump, Donald J.	Member
127 <u>Midland Associates</u>			
Owned by :	<u>% Ownership</u>	<u>Name</u>	<u>Role</u>
	25	Donald J. Trump	Partner
	75	Trump Family Members	Partner
128 <u>NITTO WORLD CO., LIMITED</u>			
Owned by :	<u>% Ownership</u>	<u>Name</u>	<u>Role</u>
	100	TRUMP TURNBERRY	Shareholder
129 <u>OCEAN DEVELOPMENT MEMBER INC</u>			
Owned by :	<u>% Ownership</u>	<u>Name</u>	<u>Role</u>
	100	Trump, Donald J.	Shareholder
Has ownership interest in :	<u>Entity Name</u>	<u>Ownership</u>	<u>Title</u>
	OCEAN DEVELOPMENT SERVICES	1.00%	Member
	LLC		
130 <u>OCEAN DEVELOPMENT SERVICES LLC</u>			
Owned by :	<u>% Ownership</u>	<u>Name</u>	<u>Role</u>
	99	Trump, Donald J.	Member
	1	OCEAN DEVELOPMENT MEMBER INC	Member
131 <u>One Central Park West Associates</u>			
Owned by :	<u>% Ownership</u>	<u>Name</u>	<u>Role</u>
	50	TRUMP CENTRAL PARK WEST CORP	Partner
	50	GALBREATH COLUMBUS CIRCLE	Partner
		DEVELOPMENT ASSOCIATES, L.P.	
Has ownership interest in :	<u>Entity Name</u>	<u>Ownership</u>	<u>Title</u>

Instructions for Part 2

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Filer's Name		Page Number	
Donald J. Trump		A36 of 44	

Reference # **Part 2: Filer's Employment Assets and Income - Part 2 - EXHIBIT A (ATTACHED SCHEDULE)**

99	Trump, Donald J.	Member
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392 **TRUMP MARKS WESTCHESTER CORP**

Owned by :	% Ownership	Name	Role
	100	Trump, Donald J.	Shareholder
Has ownership interest in :	Entity Name	Ownership	Title
	TRUMP MARKS WESTCHESTER LLC	1.00%	Managing Member

393 **TRUMP MARKS WESTCHESTER LLC**

Owned by :	% Ownership	Name	Role
	1	TRUMP MARKS WESTCHESTER CORP	Managing Member
	99	Trump, Donald J.	Member

394 **TRUMP MARKS WHITE PLAINS CORP**

Owned by :	% Ownership	Name	Role
	100	Trump, Donald J.	Shareholder

395 **TRUMP MARKS WHITE PLAINS LLC**

Owned by :	% Ownership	Name	Role
	1	TRUMP MARKS WHITE PLAINS CORP	Managing Member
	99	Trump, Donald J.	Member

396 **TRUMP MIAMI RESORT MANAGEMENT LLC**

Owned by :	% Ownership	Name	Role
	1	TRUMP MIAMI RESORT MANAGEMENT MEMBER CORP	Managing Member
	99	Trump, Donald J.	Member

397 **TRUMP MIAMI RESORT MANAGEMENT MEMBER CORP**

Owned by :	% Ownership	Name	Role
	100	Trump, Donald J.	Shareholder
Has ownership interest in :	Entity Name	Ownership	Title
	TRUMP MIAMI RESORT MANAGEMENT LLC	1.00%	Managing Member

398 **TRUMP MODEL MANAGEMENT LLC**

Assumed Names :	D/B/A	Jurisdiction	
	TRUMP MODELS	New York	
Owned by :	% Ownership	Name	Role
	15	Annie Veltri	Member
	85	TMG Member, LLC	Member

399 **TRUMP NATIONAL GOLF CLUB - COLTS NECK**

Owned by :	% Ownership	Name	Role
	1	TRUMP NATIONAL GOLF CLUB COLTS NECK MEMBER CORP	Managing Member
	99	Trump, Donald J.	Member

400 **TRUMP NATIONAL GOLF CLUB COLTS NECK MEMBER CORP**

Owned by :	% Ownership	Name	Role
	100	Trump, Donald J.	Shareholder
Has ownership interest in :	Entity Name	Ownership	Title
	TRUMP NATIONAL GOLF CLUB - COLTS NECK	1.00%	Managing Member

401 **TRUMP NATIONAL GOLF CLUB - WESTCHESTER**

Owned by :	% Ownership	Name	Role
	1	TRUMP NATIONAL GOLF CLUB MEMBER CORP	Managing Member
	99	DJT HOLDINGS LLC	Managing Member

402 **TRUMP NATIONAL GOLF CLUB MEMBER CORP**

Owned by :	% Ownership	Name	Role
	100	Trump, Donald J.	Shareholder
Has ownership interest in :	Entity Name	Ownership	Title

EXHIBIT G

Missing from Trump's list of charitable giving: His own personal cash

By David A. Fahrenthold and Rosalind S. Helderman April 10

Since the first day of his presidential campaign, Donald Trump has said that he gave more than \$102 million to charity in the past five years.

To back up that claim, Trump's campaign compiled a list of his contributions — 4,844 of them, filling 93 pages.

But, in that massive list, one thing was missing.

Not a single one of those donations was actually a personal gift of Trump's own money.

Instead, according to a Washington Post analysis, many of the gifts that Trump cited to prove his generosity were free rounds of golf, given away by his courses for charity auctions and raffles.

The largest items on the list were not cash gifts but land-conservation agreements to forgo development rights on property Trump owns.

Trump's campaign also counted a parcel of land that he'd given to New York state — although that was in 2006, not within the past five years.

In addition, many of the gifts on the list came from the charity that bears his name, the Donald J. Trump Foundation, which didn't receive a personal check from Trump from 2009 through 2014, according to the most recent public tax filings. Its work is largely funded by others, although Trump decides where the gifts go.

Some beneficiaries on the list are not charities at all: They included clients, other businesses and tennis superstar Serena Williams.

This list produced by Trump's campaign — which has not been reported in detail before — provides an unusually broad portrait of Trump's giving, and his approach to philanthropy in general.

It reveals how Trump has demonstrated less of the soaring, world-changing ambitions in his philanthropy than many other billionaires. Instead, his giving appears narrowly tied to his business and, now, his political interests.

His foundation, for example, frequently gave money to groups that paid to use Trump's facilities, and it donated to conservatives who could help promote Trump's rise in the Republican Party. The foundation's second-biggest donation described on the campaign's list went to the charity of a man who had settled a lawsuit with one of Trump's golf courses after being denied a hole-in-one prize.

The tally of Trump's giving was provided by Trump's campaign last year to the Associated Press, which was attempting to assess Trump's recent record of charitable giving. The AP, which did not publish the list, provided it to The Post.

When asked about The Post's analysis, a top Trump aide acknowledged that none of the gifts had come in cash from the billionaire himself. But, he said, that was because the list was not a complete account of Trump's gifts.

The aide, Allen Weisselberg, chief financial officer of the Trump Organization, said Trump had, in fact, given generously from his own pocket. But Weisselberg declined to provide any documentation, such as saying how much charitable giving Trump has declared in his federal tax filings.

"We want to keep them quiet," said Weisselberg, who is also treasurer of the Trump Foundation. "He doesn't want other charities to see it. Then it becomes like a feeding frenzy."

'The Grateful Millionaire'

In the early years of his career — when Trump was making a name as America's human embodiment of success — he was known for acts of real, and well-publicized, philanthropy.

In 1986, Trump heard about a Georgia farmer who'd committed suicide because of an impending foreclosure. He reached out.

"He said, 'Forget it. I'll pay it off.' He paid for it out of his personal money," said Betsy Sharp, the daughter of the farmer, Leonard Hill III. Trump flew the family to Trump Tower to burn the hated mortgage in front of TV cameras, with an ebony cigarette lighter that said "New York."

Through a combination of good deeds and good publicity, the idea of Trump as a gallant friend of the little guy caught on. By the late 1990s, as documented by the debunking site Snopes.com, Trump's name had been grafted onto a classic American urban legend, known to folklorists as "The Grateful Millionaire."

Trump — it was said in email chains and books of inspirational stories — had once been stranded in a limo. A good Samaritan stopped to help. Trump secretly paid off his mortgage. The legend goes back to at least 1954, when the

grateful millionaire was Henry Ford.

The most complete public accounting of Trump's actual charity so far is the \$102 million list provided by his campaign last year, titled "Donald J. Trump Charitable Contributions."

In places, it appears to be an unedited mash-up of internal lists kept by Trump's golf clubs, noting all the things they'd given away to anybody. True charities like the National Center for Missing and Exploited Children are followed by freebies given away at sales meetings, followed by entries in cryptic internal shorthand. At a Trump golf course in Miami, for instance, the recipient of a \$800 gift was listed only as "Brian."

To identify what the gifts represented, The Post interviewed recipients to find out what they'd received — and matched those gifts to others with the exact same dollar value.

By extrapolation, The Post estimated that Trump claimed credit for at least 2,900 free rounds of golf, 175 free hotel stays, 165 free meals and 11 gift certificates to spas.

"I thought it would be a pretty hot ticket, [and] it was," said Marion Satterthwaite, who runs a charity that helps bring back dogs that U.S. service members have bonded with overseas. She was holding a silent auction, and one of things she auctioned off was a free round of golf donated by Trump's private golf club in Colts Neck, N.J. At that club, Trump appeared to claim donations of 76 foursomes, each valued at \$1,720. Satterthwaite said that, in her case, it sold for less.

But Trump's list was also riddled with apparent errors, in which the "charities" that got his gifts didn't seem to be charities at all.

Trump listed a donation to "Serena William Group" in February 2015, valued at exactly \$1,136.56. A spokeswoman for the tennis star said she had attended a ribbon-cutting at Trump's Loudoun County, Va., golf course that year for a new tennis center. But Trump hadn't donated to her charity. Instead, he had given her a free ride from Florida on his plane and a free framed photo of herself.

The Post sent an annotated version of this list — showing the results of its analysis, and its extrapolations about what each gift represented — to the Trump campaign, along with a detailed list of questions about Trump's giving.

The Trump campaign declined to answer most of the questions or to provide an interview with Trump.

The Post's analysis showed that the small giveaways from Trump businesses seemed to account for the bulk of the 4,844 transactions that Trump took credit for. But they accounted for only about \$6.4 million of the total dollar figure.

The most expensive charitable contributions on Trump's list, by contrast, dealt with transactions related to real estate.

For one, Trump counted \$63.8 million of unspecified "conservation easements." That refers to legal arrangements — which could bring tax breaks — in which a landowner agrees to forgo certain kinds of development on land that he owns. In California, for example, Trump agreed to an easement that prevented him from building homes on a plot of land near a golf course. But Trump kept the land, and kept making money off it. It is a driving range.

In this election, neither of Trump's Republican rivals — Sen. Ted Cruz (Tex.) nor Ohio Gov. John Kasich — has detailed his recent charitable giving. Among the Democrats, former secretary of state Hillary Clinton said she and her husband gave 11 percent of their yearly income, and the Clintons have also established a foundation that has collected \$2 billion for charity around the world, while also increasing their global celebrity and political network. Sen. Bernie Sanders (Vt.) said he gave 5 percent of his yearly income.

Trump has not entirely given up making splashy public gifts.

In 2009, for instance, Trump appeared on the TV show "Extra" and promised that he would pay a struggling viewer's bills. "This is really a bad time for a lot of people," Trump said as the contest was announced.

The winner, who got \$5,000, was a woman who runs a spray-tanning business.

But the contest's rules, posted online, made clear that the winner would not be flown to New York like the family Trump helped in the 1980s. Moreover, the rules said, the winner would have to pay for cab fare.

"The winner must live in New York, provide their own transportation to Trump Tower, and be willing to meet Donald on-camera to accept his check," the rules warned.

According to tax records, the winner's check came from the Donald J. Trump Foundation, the charity created by Trump in the late 1980s. The same was true on Saturday, when Trump made a well-publicized \$100,000 gift to the National September 11 Memorial Museum in New York. The foundation gave the money after Trump made a brief visit to the museum as he campaigned ahead of next week's New York primary.

The Trump Foundation

On the \$102 million list created by Trump's campaign, he claims credit for \$7 million given by the foundation, where Trump serves as president.

The biggest donors to his foundation in recent years have been other people, most notably Vince and Linda McMahon, top executives at World Wrestling Entertainment. They donated \$5 million after Trump made a cameo on "Wrestlemania" in 2007, according to a spokesman for WWE. The spokesman said Trump was paid separately for the appearance. Linda McMahon has since left WWE and is now active in politics. She and her husband both declined to comment about the donation.

Trump's foundation has operated on a smaller scale than some run by his billionaire peers. Filmmaker George Lucas, for instance, who is tied with Trump at 324th place in Forbes's list of the world's billionaires, donated \$925 million to his family foundation in 2012. In 2014, Lucas's foundation gave out \$55 million in donations to museums, hospitals, artistic groups and environmental charities.

Media magnate Sumner Redstone, also tied with Trump in the Forbes rankings, gave \$28 million from his company to his foundation that year, and the foundation in turn gave out \$31 million in gifts.

The Trump Foundation gave out \$591,000 in 2014.

"He's using [the foundation] as a kind of checkbook, with other people's money," Leslie Lenkowsky, a faculty member at Indiana University's school of philanthropy, said after The Post described the recipients of the Trump Foundation's gifts.

"Not a good model. It's not wrong. It's not unique. But it's poor philanthropy."

In 2013, Trump was trying to persuade the V Foundation — a cancer-fighting group founded by Jim Valvano, the college basketball coach who died in 1993 — to hold a fundraiser at his Trump Winery in Virginia.

Trump's foundation gave \$10,000 to the V Foundation that summer, just when the V Foundation later said it was being wooed. He got the fundraiser.

Trump's foundation also gave to the American Cancer Society, the Dana-Farber Cancer Institute and the Leukemia and Lymphoma Society, all of which have held fundraisers at his Mar-a-Lago Club in Palm Beach, Fla.

In 2010, a man named Martin Greenberg was playing in a charity tournament at Trump's course in Briarcliff Manor, N.Y. A \$1 million prize was offered to anybody who got a hole in one.

Greenberg did. But then, hours later, he was called back. The rules said the hole-in-one shot had to go 150 yards. But, according to court documents, Trump's course had made the hole too short.

Greenberg got nothing. He sued.

On the day that Trump and the other parties told the court that they had settled the case, the Donald J. Trump Foundation made its first and only donation to the Martin B. Greenberg Foundation, for \$158,000. Both Greenberg and Trump's campaign declined to comment.

Trump also used the foundation's money to play the role of a big-hearted billionaire on TV — doling out at least \$194,000 to various causes favored by contestants on "Celebrity Apprentice," Trump's spinoff reality show that appeared on NBC.

In 2012, NBC Universal made a \$500,000 donation to the Trump Foundation. NBC Universal declined to comment about that gift.

In some cases, the recipient was a complete stranger: a club member who stopped him at the pool, another golfer, or a woman who'd just walked into his office.

"I'll never forget. He said, 'Debra, you have the 'it' factor. He said, 'I don't know any other beautiful woman going into the inner city,' " said Debra George, a Christian minister in Texas who met Trump when a mutual friend brought her along to his office. Trump asked how she paid for her work.

"It's kind of like walking on air. We trust God," she told him. "He said, 'I'm going to help you.' " Trump's foundation gave her charity \$10,000.

Some recipients said they liked the Trump Foundation's informal approach to giving. "(At) a lot of foundations, you know, there's a grant process," said Barbara Abernathy, whose charity helps children with cancer. Not Trump, whom Abernathy had met at a Mar-a-Lago gala. She later asked his people for money, to help a patient's family afford medicine and a car payment. She got \$1,000 in two weeks."

In 2013, Scott K. York, then the head of the Board of Supervisors in Loudoun County, came to Trump's son to ask for help. An elementary school in the county needed a \$110,000 handicapped-accessible playground. York asked for \$10,000. Trump's foundation gave \$7,500.

A month later, the Trump Foundation gave \$50,000 to the American Conservative Union Foundation. With donations to that group, Politico has reported, Trump was building a relationship that won him prime speaking slots at the Conservative Political Action Conference, a coveted venue for an aspiring Republican presidential candidate.

In this campaign, Trump said he brought in more than \$6 million during a fundraiser for veterans groups he held on Jan. 28 in Iowa.

But the Trump campaign has detailed only about \$3 million worth of donations that have been given to veterans groups. Some were given directly by donors recruited by Trump, and in some cases, the Trump Foundation served as a middleman.

Trump's campaign has said that Trump is continuing to identify and vet new recipients for the money but declined to provide additional details.

Trump spokeswoman Hope Hicks declined to respond to questions regarding whether Trump has followed through on a pledge to donate \$1 million of his own money to the cause.

Still, as he has campaigned, Trump has benefited from a reputation for generosity.

"His limousine broke down one time, a couple stopped and helped him. He paid off their mortgage a few days later. These are all things that you never hear about Donald Trump," Jerry Falwell Jr., the president of Liberty University, said on Fox News's "Hannity" in January.

The Grateful Millionaire. The legend, alive and well.

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In a telephone interview, Falwell, who has endorsed Trump, was asked: Did you ever ask Trump if that story was true?


"I never did," Falwell said. "But, Trey, didn't you search that on Google?"

"I didn't," his son Trey said. "But somebody did."

"It was in some publication in 1995," the elder Falwell concluded. "But I forget which publication."

Anu Narayanswamy and Alice Crites contributed to this report.

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EXHIBIT H

POLITICS

Trump's War With Palm Beach

For Palm Beachers, watching Trump claw and bluster his way through the Republican primary has a familiar ring.

By FRANK CERABINO | September 05, 2015



Getty

Donald Trump's noisy, rule-breaking entrance into national politics may be a revelation for some. But not for residents of his home town of Palm Beach, Fla., where for the past 30 years he has shattered old-money conventions and sensibilities with the same thin-skinned, sue-you-in-a-heartbeat, self-congratulatory ethos that has made him such a mesmerizing character on the national stage.

For decades I've watched most of this comedy-drama from my perch at *The Palm Beach Post*, where I work as a local news columnist on the hunt for humor. And when humor's your bag, there's no greater gift than Donald Trump. A gift I must now share, reluctantly, with my countrymen.

Where do I begin, America, to tell you what life dominated by The Donald is like—an experience you too will have if he enters the White House? There are many stories, but I think I should start with the flagpole on the front lawn of Mar-a-Lago, the 17-acre Palm Beach property Trump bought decades ago.

First you should know that Palm Beach is a town where measurements matter. Leaf blowers require inspections to verify they emit no more than 65 decibels from 50 feet away. Residents holding a garage sale are restricted to one sign that can't be more than 4 square feet in size. And residents flying flags on their property are restricted to flagpoles that are no higher than 42 feet and flags that are a maximum of four feet by six feet.

In October 2006, without getting a permit or a variance, Trump put up an 80-foot flagpole on the front lawn of Mar-a-Lago, with a car dealership-sized American flag of 15 feet by 25 feet flying from it.

Oh, he knew what he was doing. Trump, after all, had been fighting with the town poohbahs from the very moment he'd crashed into the complacent, clubby world of Palm Beach to buy Mar-a-Lago—the former estate of blue-blooded cereal heiress Marjorie Merriweather Post—which turned out to be one of those great deals he couldn't afford. More on that later.

Trump knew from experience that Palm Beach was a stickler for adherence to its ordinances. He had once paid a \$5,000 fine to the town for replacing a section of dead hedges with replacements that weren't quite tall enough.

But Trump had bigger changes in mind than merely out-flagging his neighbors. He was plainly inviting a lawsuit. The town council took the bait, citing the oversized pole and flag as violations of the town code, and fining Trump \$250 a day for every day they remained on the estate.

"The town council of Palm Beach should be ashamed of itself," Trump responded. "They're fining me for putting up the American flag. This is probably a first in United States history." He went on Nancy Grace's national TV show to complain that the Town of Palm Beach was unpatriotic. Then, ignoring the town's violations, which grew to be a \$120,000 fine and counting, he filed a lawsuit against Palm Beach, asking for \$25 million in damages to what he called an abridgment to his constitutional right to free speech.

Tucked into his patriotic posturing was a completely unrelated legal matter that he made part of his multi-million lawsuit: a complaint about the town code that requires large commercial enterprises to be "town serving." The town requires proof from local businesses that at least 50 percent of their business comes from town residents. So, for example, when Neiman Marcus opened on Worth Avenue in Palm Beach, it was allowed to do so by promising that it would only advertise in the town's newspaper, and not in publications that circulated to shoppers who don't live on the island.

For Trump, eliminating the "town serving" requirement would mean that he could offer more memberships to his Mar-a-Lago social club to people who had no connection to Palm Beach, making it easier for him to keep his club full. Softening up the town on the flag issue to pursue some other angle was a classic Trump move. Though he has yet to get this particular exemption waived, Palm Beach has learned from experience that Trump's lawsuits are never settled, just dormant. One of his Palm Beach lawyers said recently that the "town serving" issue is still unresolved and ripe for more litigation.

As for the flag, guess who won?

Trump eventually dropped his lawsuit over the flag, and in exchange the town waived its fines. As terms of a court-ordered mediation, Trump would file for a permit and be allowed to keep an oversized pole on Mar-a-Lago that was 10-feet shorter than original pole and on a different spot on his lawn. The agreement also called for him to donate \$100,000 to veterans' charities.

That's some expensive defiance. But maybe you've got look at in a more Trumpian light. He essentially got what he wanted: The biggest pole on Palm Beach. (Paging Dr. Freud?)

Advantage, once again, Donald Trump. And for Palm Beachers, just another encounter with the human shock wave from New York.

So it has been all along down here, from the moment in 1985 when Trump decided that Mar-a-Lago would be his personal castle. Mar-a-Lago, the last of Palm Beach's estates to stretch from the ocean to the Intracoastal Waterway, was a single-family home of gargantuan proportions: Its Mediterranean-Revival-style mansion had 118 rooms, including 58 bedrooms and 33 bathrooms and a 75-foot tower that could be seen for miles. The property was roomy enough for its own 9-hole golf course and citrus grove.

Built in 1927 for Post, then the richest woman in America, she later willed it to the federal government to be used as a winter White House for American presidents. The home became a National Historic Landmark. But presidents didn't use it and the federal government grew weary of paying for the \$1 million a year it took to maintain it.

So the estate was put up for sale. At the time, Trump was a hotshot 39-year-old New York real estate developer who two years earlier had opened his signature 58-story Trump Tower skyscraper in Manhattan. And the federal government, eager to unload the Florida mansion, agreed to a \$10 million sale—\$7 million for the property and \$3 million for the furnishings—in a contract that required Trump to put down only \$2,812 of his own money.

A Palm Beach County property appraiser would later write in a court brief that a person buying a "rabbit warren condo" in a lower-middle class neighborhood would have had to put more money down than Trump did. And in his first book, *The Art of the Deal*, Trump wrote about his purchase of Mar-a-Lago as an example of his deal-making prowess.

"I've been told the furnishings in Mar-a-Lago alone are worth more than I paid for the house," he wrote. Mar-a-Lago was "as close to paradise as I'm going to get," he wrote.

Palm Beach County agreed by assessing Mar-a-Lago's property at \$11.5 million, 64 percent more than he paid for it. This left Trump in the tough position of bragging publically about getting his spare mansion in Palm Beach for a bargain, while arguing privately in court filings he should get a tax deduction.

“I paid the highest price for a piece of land that’s costing \$2 or \$2 ½ million a year to maintain,” he testified. “Maybe the tax assessment will force us to develop the land, which I’m sure won’t make the town very happy.”

This was the kind of brash talk the old-money aristocrats feared from Trump, who wasn’t the sort of genteel patrician favored by the Palm Beach Social Index-Directory, a yearly published, privately circulated little black book designed to separate the island’s socially acceptable wealthy from the uncouth rich. He was regarded by some as a kind of barbarian at the gated community, a hustler too eager to impress. And his threat of chopping up Mar-a-Lago was an omen of some rough relations on the horizon.

It’s the kind of tactic that the GOP establishment is getting a taste of now, as Trump breaks with party orthodoxy on some issues while bad-mouthing its A-list politicians and pundits. Republican elites would do well to learn that Trump pursues what he wants without much regard for rules. And that rather than fold on his gambles, Trump tends to double down.

At the time his Mar-a-Lago investment was in doubt, Trump had launched another local real estate venture across the Intracoastal Waterway in West Palm Beach—an ailing 33-story, twin-tower complex that a Palm Beach developer had lost in foreclosure. Trump bought the property in 1986 for \$40 million cash, \$3.2 million less than the Bank of New York paid to reclaim the property at a public foreclosure auction. Like Mar-a-Lago, it was panning out to be a deal he couldn’t afford.

Trump renamed the West Palm Beach condo project after himself. And he spent millions to spruce up the public areas of the Trump Plaza of the Palm Beaches and advertise the sale of its luxury condos in Northeastern newspapers.

“This is not a very large deal for me, but it’s a quality deal,” Trump said at the time. “We expect a lot of people in Palm Beach to be buying apartments for family, et cetera.”

But after four years of heavy promoting, fewer than half of the units had been sold, and Trump had borrowed \$60 million from Marine Midland Bank of New York to pay for the project, money he couldn’t repay.

In 1991, two months before he would file for corporate bankruptcy on his Trump Taj Mahal casino in Atlantic City, Trump turned over Trump Plaza of the Palm Beaches to Marine Midland Bank, in exchange for the bank agreeing to forgive Trump for his \$14 million personal guarantee on the loan.

If it was a humbling moment for Trump, he didn’t act that way. For just as we’ve seen more recently on the campaign trail, no matter what he does—whether it’s embarking on a ridiculous birther quest or poisoning his party’s chances with key voter demographics—Trump is always capable of packaging his own failure as success.

So when he lost his West Palm Beach luxury condo to the banks, he took a victory lap.

“It’s great for me because I get off a guarantee,” he said. “Only because of the success of the development could I have done that.”

But it was hardly a success. Only 100 of the 221 units had been sold. And once the banks took over the project from Trump, they unloaded the unsold units in a fire-sale auction that accepted bids of \$75,000 for units that had been previously priced as high as \$470,000.

Trump, who was still trying to find a way to salvage his Mar-a-Lago deal, didn’t want to give his Palm Beach neighbors the idea that he was drowning in debt.

So after the bank sold off the units of the Trump Plaza of the Palm Beaches, Trump took out a full-page ad in The Palm Beach Daily News, the island newspaper known to locals as “The Shiny Sheet” for its high quality paper that eliminates ink rub-off stains. The ad didn’t mention that he had completely lost his financial stake in the condos, or how the project achieved full occupancy.

“This is an advertisement to explain the great success of a development, Trump Plaza of the Palm Beaches, which many people, until recently, had not been fully aware,” the ad said. “When I look at Trump Plaza from Mar-a-Lago, I am proud that even in the horrendous real estate market of the early 1990s, I was able to rescue this previously troubled and unsold development, add management, construction expertise and the name Trump ... and make it into one of Florida’s greatest success stories.”

That “success” didn’t change the fact that Trump still couldn’t afford Mar-a-Lago as a single family home, and nobody was coming along to relieve him from the deal on “paradise” he had made.

His proposed solution was to chop his National Historic Landmark into something he called Mansions of Mar-a-Lago, a development that would put a public road through the middle of the estate, which would lead to the 10 mini-mansions he would build on the property, including one on the front lawn.

The Palm Beach Town Council shot down all of Trump’s proposed changes to the property, even when he reduced his mini-mansion plans from 10 to seven. Instead, they encouraged him to find a buyer if he couldn’t afford to keep the estate intact. After all, New York packaging magnate Nelson Peltz had spent \$21 million to buy the Palm Beach oceanfront estate, Montsorrel, two years after Trump bought Mar-a-Lago. Go find another Norman Peltz to take Mar-a-Lago off your hands, Trump was advised.

Instead, when the town’s government refused to bend to his demands, Trump sued. The lawsuit against the Town of Palm Beach, which would prove to be not his last, would eventually cause his neighbors to lawyer up against him.

“There are rules around here,” Ron Kolins, a lawyer representing one of Trump’s neighbors, told the *Palm Beach Post* at the time, “and those rules apply to everyone, whether or not you have a famous name.”

After his Mansions of Mar-a-Lago plan was rejected, Trump found another way to salvage his stake in Mar-a-Lago. He offered to drop his lawsuit if council members allowed him to convert his estate into a new private club on the island. The Mar-a-Lago Club.

This was a tempting offer. So much of Palm Beach social life was dictated by club memberships. The gentiles and Jews each had their clubs. And there hadn't been a new club on the island in a quarter century. The town would get to have Mar-a-Lago remain in appearance as it was in the Merriweather Post days. And Trump would unburden himself of its expenses by selling off memberships while retaining his ownership of the property.

Membership would be capped at 500, not including spouses and children. The initiation fee would be \$50,000 with \$3,000 annual dues. The members would get to dine there, swim in the pool and attend private parties and special events with world-class singers, lecturers and entertainers.

But many Palm Beachers were still reluctant to trust Trump.

"A lot of people like to think Palm Beach is a little more genteel and old money," socialite Tamara Newell said at the time. "This is a new-money idea at an old-money location."

Though the town eventually approved the club, it only gave Palm Beachers more reasons to peck at him with their disapproval.

The town council met in special session to deny Trump the approval to have wedding night fireworks at Mar-a-Lago, where he held the reception for his 2005 wedding to his current wife, Melania.

"We have not approved any fireworks on land in at least 20 years," Councilman Norman Goldblum said.

And when an Elton John AIDS benefit at Mar-a-Lago drew 900 people a year later, the town fined Trump \$5,000 for allowing more than the agreed maximum of 700 at events there.

There is no issue too petty in Palm Beach, and Trump's combative early years set the stage for retaliation. For example, when Trump changed the coat of arms on Mar-a-Lago's tower to add the name "Trump" he was brought before the members of the town's Landmarks Preservation Commission. They advised him that he needed permission to do this, and they thought the use of his name was too tacky.

"I think it's blatant advertising," landmarks commissioner Wendy Victor said at the time.

Jane Day, the town's landmark consultant, said, "Using the coat of arms to sell real estate in New York is a real problem."

Trump's response: "What am I gonna say, Jones?"

Trump never quite shared the Palm Beach aesthetic that understated elegance was much preferred over ostentatious self-promotion. He was a look-at-me brawler of a guy in a town that had once banned

shirtless jogging by men as too tacky, and had scented its sewer water with lilac and honeysuckle fragrances so that even the local residents' effluent would be understated and pleasant.

So it didn't help that Trump was an irrepressible salesman, always looking to push limits, or to promote his club with the kind of zeal that made it hard to separate fact from fiction.

Like the time he claimed that Princess Diana and her estranged husband Prince Charles had joined the Mar-a-Lago Club, and that he personally signed them both up.

"It's complete nonsense," the Buckingham Palace information officer responded.

By the time Trump was hawking club memberships, I had already gotten a little first-hand experience with Trump's insatiable appetite for shameless self-promotion.

The first January after the divorce to his first wife, Ivana, was final, Trump's publicist called all the local TV news and newspapers outlets in Palm Beach County to say that Trump was about to hold the party of all parties for that winter's Palm Beach social season.

The publicist explained that one reporter from each news outlet would be allowed to attend this party-of-the-year to mingle with a guest list of invited celebrities such as Tom Selleck, Sylvester Stallone and football star Herschel Walker.

I was on the guest list to cover the event for my newspaper. But it turned out that my role in the party was far more complex than I had imagined.

As the real guests arrived, which included busloads of fashion models from Miami, I was part of a local media contingent who wasn't allowed to actually come into the party, but instead would form a visual tableau of over-eager reporters playing the role of gate crashers to those who would see us as their cars drove up to the portico of the mansion.

Trump left us standing in his driveway in a little cluster. We were unaware, at first, of our role. But he couldn't help coming over to wring out every last drop of publicity for the night.

"We're just having a great time in Palm Beach," Trump said at one point, as he walked to our assigned spot on the driveway. "Everybody is coming. Some people are inviting themselves. It's going to be a wild party."

Trump, who seemed to be going out of his way to show he was winning his divorce, had invited a national television news reporter Judd Rose, and his crew from ABC's *Prime Time Live* show, into his home as guests for the weekend. Rose and his crew eventually filmed the money shot of the invited, but shunned local reporters yelling across the driveway at Trump to let us in, while Trump made shooing gestures with his hand, as if to be waving us off.

Rose later told us that we were described by Trump as the people who were inviting themselves to the party. I left, never getting inside that night, and wrote for the next day's newspaper about my experience as a party prop.

Trump called me two days later, saying that I should have told him who I was. My brother, a lawyer in New York, had done some legal work for Trump. "You should have told me," Trump said. "I would have let you in."

"That's OK," I told him. "I got a much better column the way things worked out."

The truth is, the arrival of Trump's oversized ego in Palm Beach was like an insurance plan for a steady stream of readable copy.

And over the years, I've long known what national political reporters are just finding out: That you can't write too much about Trump. He's an inexhaustible source of good stories equally read by people who both admire him and despise him.

While Trump was playing defense against the town's constant attempt to rein him in, he went on the attack against the county and its airport. Airlines routinely used a flight path in and out of Palm Beach International Airport in nearby West Palm Beach that brought the planes directly over Mar-a-Lago.

This didn't sit well with Trump, who argued that the noise and fumes were ruining his investment, and that the decent thing for the county to do was to move the airport farther west. Trump had been arguing this for years, to no avail, while calling the airport director Bruce Pelly, among other things, a "moron" and "the worst airport director in the country."

It turned out to be a useful gripe for Trump, one that he could turn into a new business opportunity, because just south of the airport was 214 acres of vacant scrub land owned by Palm Beach County, land he wanted. So Trump sued the county for \$75 million over the airport noise, then negotiated to drop that lawsuit in exchange for the county giving him a 75-year lease on the nearby property for \$438,000 a year.

That land became the Trump International Golf Club, a \$40 million, 18-hole, Jim Fazio-designed course that imported nearly 2 million cubic yards of dirt to transform the flat scrub land into hilly terrain with waterfalls, rock formations, and a clubhouse four stories above sea level.

Trump, who was planning to open the course with initiation fees starting at \$100,000, wanted the county to do one more thing for him: Move the jail.

That's because no matter how much landscaping he brought to the course, there was no way of disguising the ugly 12-story Palm Beach County Jail that towered over the north side of the course and

was visible from some of the holes. So as he had done with the airport, Trump asked county officials to move the jail. They refused. The sheriff found the idea amusing.

I suggested that the least the county could do was to put a sign on top of the jail to make it appear to Trump's golfers that it was a luxury hotel. I held a rename-the-jail contest in my column. The entries submitted included Bar-a-Lago, and the Breakers In, a takeoff on the famous Palm Beach hotel.

Trump wasn't laughing along. I was banned from covering the opening of the course, and Trump wrote a letter to the editor of the Palm Beach Post to complain. "Doesn't Post columnist Frank Cerabino have anything better to write about than my golf course?" his letter said.

"Perhaps, Mr. Cerabino has problems with the fact that his brother, Tom, is a highly paid lawyer whose firm works for the Trump Organization or that he forgot to thank me for the free meals he received at Mar-a-Lago."

When my brother and his wife were guests at Mar-a-Lago, my wife and I ate dinner there with them, and Trump arrived at the table for dessert, joined us, then insisted on picking up the check.

I've learned that Trump admires or despises journalists based on how useful they are to him, and that his sense of humor doesn't include anything directed at him.

Four years ago, when Trump was pretending to run for president, and making his now-familiar broad statements about how America would change for the better once he brings China and the Middle East to its knees, I wrote another column he didn't like.

He had just told a Republican group how oil prices would drop once a President Trump delivered the news to OPEC: "That price better get lower, and it better get lower fast."

I pointed out in my column that at the same time this theoretical future President Trump was browbeating the world into submission, the real Donald Trump was being pushed around by a featherweight pop singer from Barbados.

Rihanna had been booked to sing at Mar-a-Lago for a Saturday evening event, but bailed at the last minute, claiming a case of bronchitis.

It turned out that Rihanna wasn't in bed, nursing a sore throat that weekend. She was in Southern California, pushing her new fragrance, Reb'l Fleur, at Macy's and singing at the halftime show at NBA All-Star Game.

"I would think if he could control the price of Arab oil with the sound of his voice, he certainly could have restored respect to Mar-a-Lago by getting the foreign-born Rihanna on the phone Saturday morning and saying, 'That bronchitis you don't really have better get cured, and it better get cured fast.'"

Harmless jab, right?

Trump called me up to complain.

“When are you going to write something nice about me?”

The tough guy’s not above working the refs.

Over the years, Palm Beach has gradually come to accept Trump’s outsized personality along with his private club as more of an asset than a potential source of trouble. The club has hosted many glittering social events, charity balls and political fundraisers. And as a concert hall, it has housed Palm Beach Opera shows and performances from some top-notch entertainers such as Celine Dion and Tony Bennett.

As town officials moved on, their successors gradually loosened up their tight reins on the club, easing the restriction on the numbers of outdoor beach barbecues it would allow, permitting the construction of an outdoor pavilion, and allowing the club to build a 14,000-square-foot kitchen on the grounds so waiters wouldn’t have to use golf carts to haul food from inside the mansion.

Trump also figured out a good solution to paying lower taxes on Mar-a-Lago. By giving up development rights on the land to the National Trust for Historic Preservation it eliminated the county property appraiser’s ability to tax the property on the “highest and best use” standard that contemplated that the property could still be chopped up into lots and sold off.

Trump has become a Palm Beach fixture now, but it would be wrong to say he has mellowed.

And I still haven’t written the sort of nice column he has been expecting.

Two years ago, I wrote a column about him during his frivolous lawsuit against comedian Bill Maher, who said that Trump should produce a birth certificate to prove he’s not related to orangutans.

My column quoted an orangutan expert who said that it’s the orangutans, not Trump, who ought to be offended by the comparison.

Trump responded via Twitter:

“One of the country’s dumbest newspapers—The Palm Beach Post—should be put to sleep. It’s dying.”

What’s not dying is Trump’s continued war against Palm Beach International Airport.

When the airport considered expanding by adding another runway, Trump threatened another lawsuit.

The expansion never came, but Trump sued the airport again this year, this time asking for \$100 million from county taxpayers for the sooty residue left by planes flying over Mar-a-Lago.

But if history is a guide, this may not be about the airport at all.

He may be just using it for leverage to get something else he wants, but at the moment, can't have.

The thing with Trump is that he's always at war, a man on a mission to get the next thing, whether it's the biggest pole, the best social gathering of the season, or the idea that the rest of America should be calling him "Mr. President."

And woe be to those who get in his way.

EXHIBIT I

Donald Trump used money donated for charity to buy himself a Tim Tebow-signed football helmet

By David A. Fahrenthold July 1

Did Donald Trump violate IRS rules, by using a charity's money to buy himself a signed football helmet?

Four years ago, at a charity fundraiser in Palm Beach, Donald Trump got into a bidding war at the evening's live auction. The items up for sale: A Denver Broncos helmet, autographed by then-star quarterback Tim Tebow, and a Tebow jersey.

Trump won, eventually, with a bid of \$12,000. Afterward, he posed with the helmet. His purchase made gossip-column news: a flourish of generosity, by a mogul with money to burn. "The Donald giveth, and The Donald payeth," wrote the *Palm Beach Daily News*. "Blessed be the name of The Donald."

But Trump didn't actually pay with his own money.

Instead, the Susan G. Komen organization — the breast-cancer nonprofit that hosted the party — got a \$12,000 payment from another nonprofit, the Donald J. Trump Foundation.

Trump himself sent no money. (In fact, a Komen spokeswoman said, Trump has never given a personal gift of cash to the Komen organization.) He paid the bill with money from a charity he founded in 1987, but which is largely stocked with other people's money. Trump is the foundation's president. But, at the time of the auction, Trump had given none of his own money to the foundation for three years running.

The Washington Post discovered this unusual payment — a charity apparently buying sports memorabilia for a super-wealthy man — this week, during a review of Trump's charitable giving.

Afterward, three experts on tax law questioned whether Trump had violated IRS rules against "self-dealing" — which are designed to keep nonprofit officials from using their charities to help themselves.

Those rules ban the "furnishing of goods" by private foundations — like Trump's — to their own officers. If the rule is broken, the person who breaks it must notify the IRS and may have to pay a tax penalty. There could also be penalties for signing a tax return that failed to mention the violation. In 2012, the tax return for Trump's foundation checked the boxes for "no," it did not break the self-dealing rule.

But did it?

The answer may depend on what became of the helmet and jersey.

If they are still in Trump's possession — perhaps on display at one of his homes or properties — that might be deemed improper, if the IRS ever looks.

"That would be a classic violation of the prohibition on a charity being operated for the private inurement (benefit) of the charity's creator," Brett G. Kappel, an expert on tax-exempt organizations at the Akerman law firm in Washington, wrote in an email. The Trump Foundation does not appear to have offices of its own. It is headquartered at Trump's business offices in New York and has no full-time staff.

The best case for Trump, experts said, would be if he had given the helmet and jersey away to another charity, perhaps to be auctioned off at another fundraiser.

"If ... the foundation paid for it, and they owned the helmet, and the helmet was given to someone as a charitable activity," that would be enough, said John Edie, now retired, who was the longtime general counsel at the Council on Foundations.

Edie said Trump could not get off the hook by simply giving the memorabilia to a friend.

"Spending \$12,000 for a helmet and then giving it to a golfing buddy is not" charity, Edie said.

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So what happened to the the helmet and jersey? Where are they today?

Trump's campaign did not respond to requests for comment. In a Wall Street Journal video of Trump's business office in New York last year, he showed off a table of sports helmets — but the Tebow helmet did not appear to be among them.

One possible reason: The Tebow gear has lost some of its cachet. In hindsight, Trump's famous eye for a good deal seems to have deserted him on the night of the auction. As it turned out, he was buying Tebow gear close to its peak price.

That very night, Tebow's Broncos were demolished by the New England Patriots in the NFL playoffs. The Broncos traded Tebow, and he played only one more full season.

The same kind of autographed helmet and jersey that Trump bought for \$12,000 are now available for about \$415, total, online.

David A. Fahrenthold covers the 2016 presidential campaign for The Washington Post. He has been at the Post since 2000, and previously covered Congress, the federal bureaucracy, the environment, and the D.C. police. 🐦 Follow @Fahrenthold

Campaign 2016

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EXHIBIT J

How Donald Trump retooled his charity to spend other people's money

By David A. Fahrenthold September 10

Donald Trump was in a tuxedo, standing next to his award: a statue of a palm tree, as tall as a toddler. It was 2010, and Trump was being honored by a charity — the Palm Beach Police Foundation — for his “selfless support” of its cause.

His support did not include any of his own money.

Instead, Trump had found a way to give away somebody else's money and claim the credit for himself.

Trump had earlier gone to a charity in New Jersey — the Charles Evans Foundation, named for a deceased businessman — and asked for a donation. Trump said he was raising money for the Palm Beach Police Foundation.

The Evans Foundation said yes. In 2009 and 2010, it gave a total of \$150,000 to the Donald J. Trump Foundation, a small charity that the Republican presidential nominee founded in 1987.

Then, Trump's foundation turned around and made donations to the police group in South Florida. In those years, the Trump Foundation's gifts totaled \$150,000.

Trump had effectively turned the Evans Foundation's gifts into his own gifts, without adding any money of his own.

On the night that he won the Palm Tree Award for his philanthropy, Trump may have actually made money. The gala was held at his Mar-a-Lago Club in Palm Beach, and the police foundation paid to rent the room. It's unclear how much was paid in 2010, but the police foundation reported in its tax filings that it rented Mar-a-Lago in 2014 for \$276,463.

The Donald J. Trump Foundation is not like other charities. An investigation of the foundation — including examinations of 17 years of tax filings and interviews with more than 200 individuals or groups listed as donors or beneficiaries — found that it collects and spends money in a very unusual manner.

For one thing, nearly all of its money comes from people other than Trump. In tax records, the last gift from Trump was in 2008. Since then, all of the donations have been other people's money — an arrangement that experts say is almost unheard of for a family foundation.

Trump then takes that money and generally does with it as he pleases. In many cases, he passes it on to other charities, which often are under the impression that it is Trump's own money.

In two cases, he has used money from his charity to buy himself a gift. In one of those cases — not previously reported — Trump spent \$20,000 of money earmarked for charitable purposes to buy a six-foot-tall painting of himself.

Money from the Trump Foundation has also been used for political purposes, which is against the law. The Washington Post reported this month that Trump paid a penalty this year to the Internal Revenue Service for a 2013 donation in which the foundation gave \$25,000 to a campaign group affiliated with Florida Attorney General Pamela Bondi (R).

Trump's foundation appears to have repeatedly broken IRS rules, which require nonprofit groups to file accurate paperwork. In five cases, the Trump Foundation told the IRS that it had given a gift to a charity whose leaders told The Post that they had never received it. In two other cases, companies listed as donors to the Trump Foundation told The Post that those listings were incorrect.

Last week, The Post submitted a detailed list of questions about the Trump Foundation to Trump's campaign. Officials with the campaign declined to comment.

Trump and his Democratic opponent, Hillary Clinton, have both been criticized during their campaigns for activities related to their foundations.

Critics have charged that the giant Bill, Hillary and Chelsea Clinton Foundation, which employs more than 2,000 people and spends about a quarter of a billion dollars a year, has served as a way for businesses and powerful figures across the world to curry favor with one of America's most powerful families. The Clinton Foundation has also been credited by supporters and critics alike for its charitable efforts.

Trump has claimed that he gives generously to charity from his own pocket: "I don't have to give you records," he told The Post earlier this year, "but I've given millions away." Efforts to verify those gifts have not succeeded, and Trump has refused to release his tax returns, which would show his charitable giving.

That leaves the Trump Foundation as the best window into the GOP nominee's philanthropy.

In the past several days, questions about Trump's foundation have focused on the gift to Bondi's group in 2013. At the time the money arrived, Bondi's office was considering whether to launch an investigation into allegations of fraud by Trump University — accusations that Trump denies.

The investigation never started. Aides to Bondi and Trump say the gift and the case were unrelated. But Democrats have seized on what they see as a clear example of political influence improperly funded by Trump's charity.

"The foundation was being used basically to promote a moneymaking fraudulent venture of Donald Trump's. That's not what charities are supposed to do," Virginia Sen. Tim Kaine, Clinton's running mate, said Friday. "I hope there's a significant effort to get to the bottom of it and find out whether this is the end."

A threadbare operation

Trump started his foundation in 1987 with a narrow purpose: to give away some of the proceeds from his book "The Art of the Deal."

Nearly three decades later, the Trump Foundation is still a threadbare, skeletal operation.

The most money it has ever reported having was \$3.2 million at the end of 2009. At last count, that total had shrunk to \$1.3 million. By comparison, Oprah Winfrey — who is worth \$1.5 billion less than Trump, according to a Forbes magazine estimate — has a foundation with \$242 million in the bank. At the end of 2014, the Clinton Foundation had \$440 million in assets.

In a few cases, Trump seemed to solicit donations only to immediately give them away. But his foundation has also received a handful of bigger donations — including \$5 million from professional-wrestling executives Vince and Linda McMahon — that Trump handed out a little at a time.

The foundation has no paid staffers. It has an unpaid board consisting of four Trumps — Donald, Ivanka, Eric and Donald Jr. — and one Trump Organization employee.

In 2014, at last report, each said they worked a half-hour a week.

The Trump Foundation still gives out small, scattered gifts — which seem driven by the demands of Trump's businesses and social life, rather than by a desire to support charitable causes.

The foundation makes a few dozen donations a year, usually in amounts from \$1,000 to \$50,000. It gives to charities that rent Trump's ballrooms. It gives to charities whose leaders buttonholed Trump on the golf course (and then try, in vain, to get him to offer a repeat donation the next year).

It even gives in situations in which Trump publicly put himself on the hook for a donation — as when he promised a gift “out of my wallet” on NBC's “The Celebrity Apprentice.” The Trump Foundation paid off most of those on-air promises. A TV production company paid others. The Post could find no instance in which a celebrity's charity got a gift from Trump's own wallet.

Another time, Trump went on TV's “Extra” for a contest called “Trump pays your bills!”

A professional spray-tanner won. The Trump Foundation paid her bills.

A rarity among charities

About 10 years ago, the Trump Foundation underwent a major change — although it was invisible to those who received its gifts.

The checks still had Trump's name on them.

Behind the scenes, he was transforming the foundation from a standard-issue rich person's philanthropy into a charity that allowed a rich man to be philanthropic for free.

Experts on charity said they had rarely seen anything like it.

“Our common understanding of charity is you give something of yourself to help somebody else. It's not something that you raise money from one side to spend it on the other,” said Leslie Lenkowsky, the former head of the Corporation for National and Community Service, and a professor studying philanthropy at Indiana University.

By that definition, was Trump engaging in charity?

No, Lenkowsky said.

“It's a deal,” he said, an arrangement worked out for maximum benefit at minimum sacrifice.

In the Trump Foundation's early days, between 1987 and 2006, Trump actually was its primary donor. Over that span, Trump gave his own foundation a total of \$5.4 million. But he was giving it away as fast as he put it in, and by the start of 2007, the foundation's assets had dropped to \$4,238.

Then, Trump made a change.

First, he stopped giving his own money.

His contribution shrank to \$35,000 in 2007.

Then to \$30,000 in 2008.

Then to \$0.

At the same time, Trump's foundation began to fill with money from other people.

But in many other cases, his biggest donors have not wanted to say why they gave their own money, when Trump was giving none of his.

"I don't have time for this. Thank you," said Richard Ebers, a ticket broker in New York City who has given the Trump Foundation \$1.9 million since 2011.

"No. No. No. I'm not going to comment on anything. I'm not answering any of your questions," said John Stark, the chief executive of a carpet company that has donated \$64,000 over the years.

Vince and Linda McMahon declined to comment.

So did NBCUniversal, which donated \$500,000 in 2012. Its gift more than covered the "personal" donations that Trump offered at dramatic moments on "The Celebrity Apprentice" — then paid for out of the Trump Foundation.

Trump's donations to the Palm Beach Police Foundation offered a stark example of Trump turning somebody else's gift into his own charity.

Tax experts said they had rarely heard of anything like what Trump had done, converting another donor's gift into his own.

"I question whether it's ethical. It's certainly misleading. But I think it's legal, because you would think that the other foundation that's . . . being taken advantage of would look out for their own interests," said Rosemary E. Fei, an attorney in San Francisco who has advised hundreds of small foundations. "That's their decision to let him do that."

After three years, the Charles Evans Foundation stopped using Trump as a middleman.

"We realized we don't need to do it through a pass-through," said Bonnie Pfeifer Evans, the widow of Charles Evans and a trustee of the now-defunct foundation.

In 2012, the Charles Evans Foundation stopped giving money to the Trump Foundation.

In 2013, according to tax records, the Trump Foundation stopped giving to the Palm Beach Police Foundation.

The police group, which gave Trump the award, did not know that Trump's money had come from somebody else's pocket. It could not explain why he gave in some years but not others — or why he gave in the amounts he did.

“He’s the unpredictable guy, right?” said John F. Scarpa, the Palm Beach Police Foundation’s president, before The Post informed him about how Trump got the money. He said Trump’s giving wasn’t the only reason he got the award. He also could be counted on to draw a crowd to the group’s annual event. The amount paid to Trump’s club was first reported by BuzzFeed.

The police group still holds its galas at Mar-a-Lago.

Acts of ‘self-dealing’

At the same time that it began to rely on other people’s money, the Trump Foundation sometimes appeared to flout IRS rules by purchasing things that seemed to benefit only Trump.

In 2007, for instance, Trump and his wife, Melania, attended a benefit for a children’s charity held at Mar-a-Lago. The night’s entertainment was Michael Israel, who bills himself as “the original speed painter.” His frenetic act involved painting giant portraits in five to seven minutes — then auctioning off the art he’d just created.

He painted Trump.

Melania Trump bid \$10,000.

Nobody tried to outbid her.

“The auctioneer was just pretty bold, so he said, ‘You know what just happened: When you started bidding, nobody’s going to bid against you, and I think it’s only fair that you double the bid,’ ” Israel said in an interview last week.

Melania Trump increased her bid to \$20,000.

“I understand it went to one of his golf courses,” Israel said of the painting.

The Trump Foundation paid the \$20,000, according to the charity that held the benefit.

Something similar happened in 2012, when Trump himself won an auction for a football helmet autographed by football player Tim Tebow, then a quarterback with the Denver Broncos.

The winning bid was \$12,000. As The Post reported in July, the Trump Foundation paid.

IRS rules generally prohibit acts of “self-dealing,” in which a charity’s leaders use the nonprofit group’s money to buy things for themselves.

In both years, IRS forms asked whether the foundation had broken those rules: Had it “furnish[ed] goods, services or facilities” to Trump or another of its officers?

In both years, the Trump Foundation checked “no.”

Tax experts said Trump could have avoided violating the self-dealing rules if he gave the helmet and the painting to other charities instead of keeping them. Trump’s staffers have not said where the two items are now.

The IRS penalties for acts of “self-dealing” can include penalty taxes, both on charities and on their leaders as individuals.

In other cases, the Trump Foundation’s tax filings appeared to include listings that were incorrect.

The most prominent example is the improper political donation to the group affiliated with Bondi, the Florida attorney general, in 2013. In that case, Trump’s staffers said a series of errors resulted in the payment being made — and then hidden from the IRS.

First, Trump officials said, when the request came down to cut a check to the Bondi group, a Trump Organization clerk followed internal protocol and consulted a book with the names of known charities.

The name of the pro-Bondi group is “And Justice for All.” Trump’s staffer saw that name in the book, and — mistakenly — cut the check from the Trump Foundation. The group in the book was an entirely different charity in Utah, unrelated to Bondi’s group in Florida.

Somehow, the money got to Florida anyway.

Then, Trump’s staffers said, the foundation’s accounting firm made another mistake: It told the IRS that the \$25,000 had gone to a third charity, based in Kansas, called Justice for All. In reality, the Kansas group got no money.

“That was just a complete mess-up on names. Anything that could go wrong did go wrong,” Jeffrey McConney, the Trump Organization’s controller, told The Post last week. After The Post pointed out these errors in the spring, Trump paid a \$2,500 penalty tax.

Donations not received

In four other cases, The Post found charities that said they never received donations that the Trump Foundation said it gave them.

The amounts were small: \$10,000 in 2008, \$5,000 in 2010, \$10,000 in 2012. Most of the charities had no idea that Trump had said he had given them money.

One did.

This January, the phone rang at a tiny charity in White River Junction, Vt., called Friends of Veterans. This was just after Trump had held a televised fundraiser for veterans in Iowa, raising more than \$5 million.

The man on the phone was a Trump staffer who was selecting charities that would receive the newly raised money. He said the Vermont group was already on Trump's list, because the Trump Foundation had given it \$1,000 in 2013.

"I don't remember a donation from the Trump Foundation," said Larry Daigle, the group's president, who was a helicopter gunner with the Army during the Vietnam War. "The guy seemed pretty surprised about this."

The man went away from the phone. He came back.

Was Daigle sure? He was.

The man thanked him. He hung up. Daigle waited — hopes raised — for the Trump people to call back.

"Oh, my God, do you know how many homeless veterans I could help?" Daigle told The Post this spring, while he was waiting.

Trump gave away the rest of the veterans money in late May.

Daigle's group got none of it.

In two other cases, the Trump Foundation reported to the IRS that it had received donations from two companies that have denied making such gifts. In 2013, for instance, the Trump Foundation said it had received a \$100,000 donation from the Clancy Law Firm, whose offices are in a Trump-owned building on Wall Street.

"That's incorrect," said Donna Clancy, the firm's founder, when The Post called. "I'm not answering any questions."

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She hung up and did not respond to requests for comment afterward.

"All of these things show that the [Trump] foundation is run in a less-than-ideal manner. But that's not at all unusual for small, private foundations, especially those run by a family," said Brett Kappel, a Washington attorney who advises tax-

exempt organizations. “Usually, you have an accounting firm that has access to the bank statements, and they’re the ones who find these errors and correct them.”

The Trump Foundation’s accountants are at WeiserMazars, a New York-based firm. The Post sent them a detailed list of questions, asking them to explain these possible errors.

The firm declined to comment.

*Rosalind S. Helderman contributed
to this report.*

David A. Fahrenthold covers the 2016 presidential campaign for The Washington Post. He has been at the Post since 2000, and previously covered Congress, the federal bureaucracy, the environment, and the D.C. police. 🐦 Follow @Fahrenthold

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The Post Recommends

A lot of Donald Trump Jr.’s trail missteps seem to involve white nationalists and Nazis

A series of unfortunate events.

The GOP died this weekend

The GOP made itself uninhabitable for many conservatives.

Christie’s claim that Trump did not ‘on a regular basis’ spout birther nonsense after 2011

This is so obviously false that we wonder how Christie manages to say it with a straight face.

EXHIBIT K

Form 990-PF

Return of Private Foundation

or Section 4947(a)(1) Trust Treated as Private Foundation

OMB No 1545-0052

2014

Department of the Treasury
Internal Revenue ServiceDo not enter social security numbers on this form as it may be made public.
Information about Form 990-PF and its separate instructions is at www.irs.gov/form990pf.

Open to Public Inspection

For calendar year 2014 or tax year beginning

, and ending

Name of foundation THE DONALD J. TRUMP FOUNDATION		A Employer identification number 13-3404773						
Number and street (or P.O. box number if mail is not delivered to street address) C/O WEISERMAZARS LLP 60 CROSSWAYS PK DR		B Telephone number 212.715.7231						
City or town, state or province, country, and ZIP or foreign postal code WOODBURY, NY 11797		C If exemption application is pending, check here <input type="checkbox"/>						
G Check all that apply: <table border="0"> <tr> <td><input type="checkbox"/> Initial return</td> <td><input type="checkbox"/> Initial return of a former public charity</td> </tr> <tr> <td><input type="checkbox"/> Final return</td> <td><input type="checkbox"/> Amended return</td> </tr> <tr> <td><input type="checkbox"/> Address change</td> <td><input type="checkbox"/> Name change</td> </tr> </table>		<input type="checkbox"/> Initial return	<input type="checkbox"/> Initial return of a former public charity	<input type="checkbox"/> Final return	<input type="checkbox"/> Amended return	<input type="checkbox"/> Address change	<input type="checkbox"/> Name change	D 1. Foreign organizations, check here <input type="checkbox"/> 2. Foreign organizations meeting the 85% test, check here and attach computation <input type="checkbox"/>
<input type="checkbox"/> Initial return	<input type="checkbox"/> Initial return of a former public charity							
<input type="checkbox"/> Final return	<input type="checkbox"/> Amended return							
<input type="checkbox"/> Address change	<input type="checkbox"/> Name change							
H Check type of organization: <input checked="" type="checkbox"/> Section 501(c)(3) exempt private foundation <input type="checkbox"/> Section 4947(a)(1) nonexempt charitable trust <input type="checkbox"/> Other taxable private foundation		E If private foundation status was terminated under section 507(b)(1)(A), check here <input type="checkbox"/>						
I Fair market value of all assets at end of year (from Part II, col (c), line 16) \$ 1,273,895. (Part I, column (d) must be on cash basis)		F If the foundation is in a 60-month termination under section 507(b)(1)(B), check here <input type="checkbox"/>						
J Accounting method: <input type="checkbox"/> Cash <input checked="" type="checkbox"/> Accrual <input type="checkbox"/> Other (specify)								

Part I Analysis of Revenue and Expenses (The total of amounts in columns (b), (c), and (d) may not necessarily equal the amount in column (a).)		(a) Revenue and expenses per books	(b) Net investment income	(c) Adjusted net income	(d) Disbursements for charitable purposes (cash basis only)
1 Contributions, gifts, grants, etc., received		497,400.		N/A	
2 Check <input type="checkbox"/> if the foundation is not required to attach Sch B					
3 Interest on savings and temporary cash investments		3,449.	3,449.		STATEMENT 1
4 Dividends and interest from securities					
5a Gross rents					
b Net rental income or (loss)					
6a Net gain or (loss) from sale of assets not on line 10					
b Gross sales price for all assets on line 6a					
7 Capital gain net income (from Part IV, line 2)			0.		
8 Net short-term capital gain					
9 Income modifications					
10a Gross sales less returns and allowances					
b Less: Cost of goods sold					
c Gross profit or (loss)					
11 Other income					
12 Total. Add lines 1 through 11		500,849.	3,449.		
13 Compensation of officers, directors, trustees, etc		0.	0.		0.
14 Other employee salaries and wages					
15 Pension plans, employee benefits					
16a Legal fees					
b Accounting fees		5,000.	0.		5,000.
c Other professional fees					
17 Interest					
18 Taxes					
19 Depreciation and depletion					
20 Occupancy					
21 Travel, conferences, and meetings					
22 Printing and publications					
23 Other expenses		250.	0.		250.
24 Total operating and administrative expenses. Add lines 13 through 23		5,250.	0.		5,250.
25 Contributions, gifts, grants paid		591,450.			591,450.
26 Total expenses and disbursements. Add lines 24 and 25		596,700.	0.		596,700.
27 Subtract line 26 from line 12:					
a Excess of revenue over expenses and disbursements		<95,851.>			
b Net investment income (if negative, enter -0-)			3,449.		
c Adjusted net income (if negative, enter -0-)				N/A	

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Form 990-PF (2014)

625 22

THE DONALD J. TRUMP FOUNDATION

13-3404773

Part XV Supplementary Information**3** Grants and Contributions Paid During the Year (Continuation)

Recipient Name and address (home or business)	If recipient is an individual, show any relationship to any foundation manager or substantial contributor	Foundation status of recipient	Purpose of grant or contribution	Amount
ST FRANCIS FOOD PANTRIES AND SHELTERS 450 SEVENTH AVENUE, SUITE 2306 NEW YORK, NY 10123		PC	GENERAL	1,000.
THE ECONOMIC CLUB OF WASHINGTON D C 1156 15TH STREET, NW, SUITE 600 WASHINGTON, DC 20005		PC	GENERAL	6,000.
THE UCLA FOUNDATION 10920 WILSHIRE BLVD, SUITE 900 LOS ANGELES, CA 90024		PC	GENERAL	5,000.
UJA-FEDERATION 130 EAST 59TH STREET NEW YORK, NY 10022		PC	GENERAL	15,000.
THE UNICORN CHILDREN'S FOUNDATION 21100 RUTH & BARON COLEMAN BLVD, SUITE 250 BOCA RATON, FL 33428		PC	GENERAL	10,000.
THE WAYUU TAYA FOUNDATION INC 225 BROADWAY, SUITE 1905 NEW YORK, NY 10007		PC	GENERAL	1,000.
WOMEN IN NEED INC 115 WEST 31ST STREET NEW YORK, NY 10001		PC	GENERAL	5,000.
THE FAMILY LEADER FOUNDATION 1100 N. HICKORY BOULEVARD, SUITE 107 PLEASANT HILL, IA 50327		PC	GENERAL	10,000.
Total from continuation sheets				