

# CREW | citizens for responsibility and ethics in washington

July 6, 2016

Steve Rumph  
Inspector General  
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Chair  
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Re: Request for Investigation into Attorney General Pam Bondi

Dear Inspector General Rumph and Chair Weston:

Citizens for Responsibility and Ethics in Washington (“CREW”) respectfully requests the Inspector General of the State of Florida Office of the Attorney General and the Florida Commission on Ethics investigate whether Attorney General Pam Bondi violated Florida law by failing to investigate or take legal action regarding complaints against Trump University and related entities after the Trump Foundation made a \$25,000 contribution to a political committee supporting her.

Before and during Attorney General Bondi’s tenure, the Office of the Attorney General (“OAG”) received more than 20 complaints against Trump University, the Trump Institute, and related entities, companies that ran real estate seminars promising to teach students Donald Trump’s business knowledge and secrets. Separately, in late August 2013, New York Attorney General Eric Schneiderman filed a lawsuit against Trump University and related entities, as well as Mr. Trump. At around the same time, Attorney General Bondi personally solicited a campaign contribution from Mr. Trump.

On September 13, 2013, the *Orlando Sentinel* published a story based on comments from OAG reporting that “now Florida Attorney General Pam Bondi’s office is reviewing the New York lawsuit’s allegations, to determine whether Florida should join the multi-state case.” Four days later, a political committee established and run by Attorney General Bondi received a \$25,000 contribution from Mr. Trump’s foundation.

Details of OAG’s decisions regarding the complaints and the New York lawsuit are not known, but a month later OAG effectively asserted it would not join the lawsuit or take similar legal action. OAG also may have decided around this time not to investigate the complaints it received.

This timeline suggests a link between the contribution and OAG's decisions, which, if proven, likely would violate Florida's prohibition on unlawful compensation and the state's standards of conduct for public officials. It is unclear, however, when those decisions were made, who made them, and why they were made. As a result, the Inspector General and the Commission on Ethics should immediately initiate an investigation into Attorney General Bondi's conduct.

### **Background**

#### **Trump University/Trump Institute Complaints and the New York Lawsuit**

Trump University LLC ("Trump University") was established in 2004 in New York by Mr. Trump and two others.<sup>1</sup> Mr. Trump owned 93 percent of the company.<sup>2</sup> In 2010, after New York State repeatedly told Trump University to stop calling itself a "university" because it was not licensed, the company changed its name to Trump Entrepreneur Initiative LLC.<sup>3</sup>

Between 2005 and 2011, Trump University ran real estate seminars that promised to impart Mr. Trump's business knowledge and secrets.<sup>4</sup> Three-day seminars cost \$1,495, and employees were encouraged to use those sessions to sell participants more expensive packages that cost up to \$34,995 per year.<sup>5</sup> In promotional advertisements, Mr. Trump claimed he was overseeing the curriculum and that the faculty was "the best of the best" and would be "hand-picked by me."<sup>6</sup> Former employees have since described Trump University as a "scam" and a "fraudulent scheme."<sup>7</sup>

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<sup>1</sup> *People v. Trump Entrepreneur Initiative LLC d/b/a Trump University LLC, et al.*, Index No. 451463, Verified Petition, ¶ 15, Aug. 24, 2013 (N.Y. Sup. Ct. N.Y. County) ("New York Complaint") (available at <http://online.wsj.com/public/resources/documents/trump.pdf>); see also Entity Information, Trump University LLC, New York Department of State, Division of Corporations (attached as Exhibit A).

<sup>2</sup> Michael Barbaro and Steve Eder, *Former Trump University Workers Call the School a 'Lie' and a 'Scheme' in Testimony*, *New York Times*, May 31, 2016, available at <http://www.nytimes.com/2016/06/01/us/politics/donald-trump-university.html>.

<sup>3</sup> New York Complaint, ¶¶ 7, 16-25.

<sup>4</sup> *Id.* ¶ 1; Julie Pace, Jill Colvin, and Jonathan Lemire, *Trump University: Sales Strategy Foreshadowed Campaign*, *Associated Press*, June 1, 2016, available at <http://bigstory.ap.org/article/1114b455bc25410ab5cc4f11017af2c6/clinton-slams-trump-university-fraudulent-scheme>.

<sup>5</sup> *Id.*; Tom Hamburger, Rosalind S. Helderman, and Dalton Bennett, *Donald Trump Said 'University' Was All About Education. Actually, It's Goal Was: 'Sell, Sell, Sell!'*, *Washington Post*, June 4, 2016, available at [https://www.washingtonpost.com/politics/donald-trump-said-university-was-all-about-education-actually-its-goal-was-sell-sell-sell/2016/06/04/5b6545d0-2819-11e6-ae4a-3cdd5fe74204\\_story.html](https://www.washingtonpost.com/politics/donald-trump-said-university-was-all-about-education-actually-its-goal-was-sell-sell-sell/2016/06/04/5b6545d0-2819-11e6-ae4a-3cdd5fe74204_story.html).

<sup>6</sup> Tom Hamburger and Rosalind S. Helderman, *Trump Involved in Crafting Controversial Trump University Ads, Executive Testified*, *Washington Post*, May 31, 2016, available at [https://www.washingtonpost.com/politics/trump-involved-in-crafting-controversial-trump-university-ads-executive-testified/2016/05/31/f032a488-2741-11e6-ae4a-3cdd5fe74204\\_story.html](https://www.washingtonpost.com/politics/trump-involved-in-crafting-controversial-trump-university-ads-executive-testified/2016/05/31/f032a488-2741-11e6-ae4a-3cdd5fe74204_story.html).

<sup>7</sup> *Id.*; Barbaro and Eder, *New York Times*, May 31, 2016.

In addition, Mr. Trump licensed a separate company to run real estate seminars under the name Trump Institute, receiving a share of the profits.<sup>8</sup> Materials from those seminars used the Trump University name and Mr. Trump appeared in an infomercial promoting them.<sup>9</sup> As with the Trump University seminars, the Trump Institute promised the faculty was handpicked by Mr. Trump, and its seminars cost up to \$2,000.<sup>10</sup> Trump University considered Trump Institute a “historical partner” and provided discounts to students who had been through a Trump Institute seminar.<sup>11</sup>

OAG received at least 22 complaints regarding Trump University, the Trump Institute, and related entities between February 2008 and May 2011.<sup>12</sup> Many of the complainants asserted they were deeply dissatisfied with the program, for which they had paid thousands of dollars and then were unable to get refunds.<sup>13</sup> Several of the complaints were made after Attorney General Bondi was elected in 2010. One complaint that was submitted the night before Attorney General Bondi took office complained about “Donald Trump University,” stating that the complainant had not even had recent communication with his mentor and wished to get at least some of his money back.<sup>14</sup> Another complaint filed in May 2011 by “a student of Trump University” said the person filing the complaint had lost more than \$26,000 and had declared bankruptcy because of it.<sup>15</sup> That complaint noted the New York Attorney General was investigating Mr. Trump and asked whether Florida would join to represent its residents if there was a lawsuit.<sup>16</sup>

In late August 2013, New York Attorney General Schneiderman filed a civil lawsuit against Trump University and related entities, Trump University’s former president, and Mr.

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<sup>8</sup> Jeff Horwitz, Gary Fineout, and Michael Biesecker, *Florida AG Asked Trump for Donation Before Nixing Case*, *Associated Press*, June 6, 2016, available at <http://bigstory.ap.org/article/e16a8223c24048d290883370dc6abe5b/florida-ag-asked-trump-donation-nixing-fraud-case>; Jonathan Martin, *Plagiarized Lessons and Deceptive Tactics: A Look Inside the Trump Institute*, *New York Times*, June 29, 2016, available at [http://www.nytimes.com/2016/06/30/us/politics/donald-trump-institute-plagiarism.html?\\_r=0](http://www.nytimes.com/2016/06/30/us/politics/donald-trump-institute-plagiarism.html?_r=0).

<sup>9</sup> *Id.*

<sup>10</sup> *Id.*

<sup>11</sup> Trump University, 2010 Playbook, at 3, 70, available at <http://static.politico.com/25/88/783a0dca43a0a898f3973da0086f/trump-university-playbook.pdf>.

<sup>12</sup> As discussed below, in response to a CREW Public Records Act request, OAG produced records regarding Trump University, the Trump Institute, the New York lawsuit, and related issues. The request and related records are available at <https://www.scribd.com/collections/16969968/CREW-Trump-University-Florida>, and the document with OAG records cited to this complaint is available at <https://www.scribd.com/document/317528146/PRR-CREW-CommPublic-Records-Act-Request-Trump-University-Trump-Foundation-Response-2>. That document is cited herein as “OAG PRA Response.”

In response to a media request for comment, OAG prepared a spreadsheet of complaints against Trump University/Trump Institute. OAG PRA Response at 275, 282-87. Several complaints named Trump University, while others named the Trump Institute, which listed an address in Boca Raton. *Id.*

<sup>13</sup> See, e.g., Complaint from Tom A. Harb, OAG PRA Response at 150-60; Complaint from David Rolla, OAG PRA Response at 121-22; Complaint from Susan Steinbrenner, OAG PRA Response at 123-24.

<sup>14</sup> Complaint from Aaron O’Brien, OAG PRA Response at 114-15, 1254.

<sup>15</sup> Complaint from Charles Jacobson, OAG PRA Response at 112-13, 1255.

<sup>16</sup> *Id.*

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Trump.<sup>17</sup> The lawsuit alleged that the defendants “engaged in persistent fraudulent, illegal and deceptive conduct in connection with the operation of Trump University,” misleading “consumers into paying for a series of expensive courses that did not deliver on their promises.”<sup>18</sup> The lawsuit sought full restitution for the more than 5,000 consumers nationwide who had been defrauded of more than \$40 million.<sup>19</sup>

Attorney General Bondi’s Solicitation and Receipt of a Campaign Contribution

At around the same time that New York Attorney General Schneiderman filed the lawsuit, Attorney General Bondi personally solicited a campaign contribution from Mr. Trump.<sup>20</sup> The exact date of the solicitation has not been made public, but a spokesman for Attorney General Bondi said she spoke to Mr. Trump “several weeks” before the contribution was received in mid-September 2013.<sup>21</sup> At the time, several political organizations associated with Attorney General Bondi had started operations to support her 2014 reelection campaign. One was And Justice for All, an “electioneering communications organization” Attorney General Bondi established and maintained, and for which she solicited contributions.<sup>22</sup>

Soon after the New York lawsuit was filed, reporters began asking OAG about Trump University/Trump Institute investigations. On September 11, 2013, an *Orlando Sentinel* reporter asked OAG if “the Florida AG [is] going to join the NY AG’s suit v. Trump et. al., and seek recovery of refunds for those who complained about the Florida affiliate?”, and OAG responded that it was “currently reviewing the allegations in the New York complaint.”<sup>23</sup> Based on this comment, the *Orlando Sentinel* reported on September 13 that “now Florida Attorney General Pam Bondi’s office is reviewing the New York lawsuit’s allegations, to determine whether Florida should join the multi-state case.”<sup>24</sup>

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<sup>17</sup> Press Release, New York State Office of the Attorney General, A.G. Schneiderman Sues Donald Trump, Trump University & Michael Sexton For Defrauding Customers Out Of \$40 Million With Sham “University”, Aug. 25, 2013, available at <http://www.ag.ny.gov/press-release/ag-schneiderman-sues-donald-trump-trump-university-michael-sexton-defrauding-consumers>.

<sup>18</sup> *Id.*

<sup>19</sup> *Id.*

<sup>20</sup> Horwitz, Fineout, and Biesecker, *Associated Press*, June 6, 2016.

<sup>21</sup> *Id.*; Tom LoBianco, Drew Griffin, and Scott Zamost, Florida AG Sought Donation Before Nixing Trump University Fraud Case, *CNN*, June 10, 2016, available at <http://www.cnn.com/2016/06/10/politics/pam-bondi-donald-trump-donation/>.

<sup>22</sup> And Justice for All, Electioneering Communication Statement of Organization, Aug. 5, 2013 (attached as Exhibit B); Pam Bondi, Statement of Solicitation for And Justice for All, Aug. 5, 2013 (attached as Exhibit C); Fla. Stat. § 106.0701(1). And Justice for All also registered with the IRS as a political organization. And Justice for All, Form 8871, Political Organization Notice of Section 527 Status, Aug. 7, 2013 (attached as Exhibit D).

<sup>23</sup> OAG PRA Response at 316-17.

<sup>24</sup> Richard Burnett, N.Y.’s Trump U Suit Draws Florida Officials’ Attention, *Orlando Sentinel*, Sept. 13, 2013, available at [http://articles.orlandosentinel.com/2013-09-13/business/os-trump-institute-complaints-20130913\\_1\\_trump-entrepreneur-initiative-trump-university-florida-attorney-general](http://articles.orlandosentinel.com/2013-09-13/business/os-trump-institute-complaints-20130913_1_trump-entrepreneur-initiative-trump-university-florida-attorney-general).



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Four days later, on September 17, The Donald J. Trump Foundation, Inc. ("Trump Foundation"), Mr. Trump's private foundation, made a \$25,000 contribution to And Justice for All, according to Florida campaign finance disclosures filed by And Justice for All.<sup>25</sup> In a news report, And Justice for All's treasurer acknowledged receiving the contribution.<sup>26</sup>

OAG's Decisions Regarding the Complaints and the New York Lawsuit

Attorney General Bondi and OAG have asserted that OAG did not investigate any of the Trump University/Trump Institute complaints, did not join New York Attorney General Schneiderman's lawsuit, and did not take any other legal action related to the complaints or lawsuit. It is unclear, however, when those decisions were made, who made them, and why they were made.

Attorney General Bondi and OAG have provided sometimes varying information to the news media about these decisions. In addition, in response to a public records act request for all records regarding Trump University, the Trump Institute, the New York lawsuit, and related issues, OAG produced thousands of pages of documents to CREW.<sup>27</sup> Those records, however, included few communications about whether OAG should investigate the complaints or whether it should join the lawsuit. Instead, they mostly reflected communications about what OAG should tell the press about those issues. OAG's response also does not appear to have included any communications from Attorney General Bondi, and contained only a handful of emails to her. As a result, while the records provide some information about OAG's apparent decisions, they do not address substantial questions about them.

OAG's statements closest to when the Trump Foundation made the \$25,000 contribution to And Justice for All suggested OAG was considering joining the New York lawsuit or taking similar legal action. As noted above, the *Orlando Sentinel* asked on September 11, 2013 if OAG would be joining the New York lawsuit. After making internal inquiries, OAG told the

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<sup>25</sup> And Justice for All contribution search, Florida Department of State, Division of Elections (attached as Exhibit E); The Donald J. Trump Foundation, 2013 Form 990-PF, Part VIII, Line 1 (excerpts attached as Exhibit F). This contribution violated federal tax law because private foundations may not engage in any political activity. After CREW requested that the Internal Revenue Service investigate the complaint in March 2016, Mr. Trump's representatives admitted it was a mistake for the contribution to have come from the Trump Foundation. See <http://www.citizensforethics.org/press/entry/crew-files-complaint-against-trump-foundation>; David A. Fahrenthold and Rosalind S. Helderman, *Trump Camp Says \$25,000 Charity Contribution to Florida AG Was a Mistake*, *Washington Post*, March 22, 2016, available at [https://www.washingtonpost.com/politics/trump-camp-issues-rare-admission-of-error-charity-donation-to-florida-ag-was-a-mistake/2016/03/22/349c8f8c-efb4-11e5-a61f-e9c95c06edca\\_story.html](https://www.washingtonpost.com/politics/trump-camp-issues-rare-admission-of-error-charity-donation-to-florida-ag-was-a-mistake/2016/03/22/349c8f8c-efb4-11e5-a61f-e9c95c06edca_story.html).

<sup>26</sup> Michael Van Sickler, *Trump Contribution to Pam Bondi's Re-election Draws More Scrutiny to Her Fundraising*, *Tampa Bay Times*, Oct. 17, 2013, available at <http://www.tampabay.com/news/politics/elections/trump-contribution-to-pam-bondis-re-election-draws-more-scrutiny-to-her/2147796>.

<sup>27</sup> CREW Public Records Act request, Mar. 17, 2016, available at <https://www.scribd.com/doc/305140644/Public-Records-Act-Request-Trump-University-Trump-Foundation>. OAG Public Records Act response, available at <https://www.scribd.com/collections/16969968/CREW-Trump-University-Florida>.

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newspaper: “We are currently reviewing the allegations in the New York complaint.”<sup>28</sup> Similar questions from the *Palm Beach Post* on September 18 also resulted in internal discussions about how to respond,<sup>29</sup> and OAG again said it was “reviewing the allegations of the New York complaint.”<sup>30</sup>

Later responses from OAG, however, varied. On October 14, 2013, the *Sentinel* followed up, asking OAG if it had decided whether to join other states in pursuing legal action against Trump University and Mr. Trump, and further asked about the “propriety” of And Justice for All accepting the contribution from the Trump Foundation.<sup>31</sup> In response, OAG told the *Sentinel* on October 15 “there is/was no multi-state investigation; therefore, there was no consideration of whether to join.”<sup>32</sup>

The newspaper’s questions sparked further internal OAG discussions about how to publicly respond and about the substance of the New York lawsuit, but the records do not reflect decisions by Attorney General Bondi or anyone else.<sup>33</sup>

OAG’s statements made around the same time about whether it had investigated the Trump University/Trump Institute complaints it received also were not fully clear. After the *Orlando Sentinel* asked on August 29 whether OAG had investigated Trump University or Mr. Trump in the last five years, OAG responded that the office “has never and does not currently have an investigation regarding Donald Trump, Trump University, or Trump Entrepreneur Institute.”<sup>34</sup> On October 15, OAG similarly noted that in light of the fact that it had only received one complaint two and a half years earlier, “there is no investigation at this time.”<sup>35</sup> Two days later, however, OAG added some nuance to these comments. Responding to an inquiry from the *Tampa Bay Times*, OAG asserted it had taken action against the Trump

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<sup>28</sup> OAG PRA Response at 316.

<sup>29</sup> OAG PRA Response at 651, 677, 712-14.

<sup>30</sup> OAG PRA Response at 661.

<sup>31</sup> OAG PRA Response at 555.

<sup>32</sup> OAG PRA Response at 751. OAG similarly told the News Service of Florida: “There was never a multi-state lawsuit against Trump University; therefore, Florida was never considering joining one.” OAG PRA Response at 643.

<sup>33</sup> OAG PRA Response at 554-60, 587-90, 776-84.

<sup>34</sup> OAG PRA Response at 318.

<sup>35</sup> OAG PRA Response at 751. OAG repeatedly asserted that it had not initiated an investigation because almost no complaints were filed regarding Trump University/Trump Institute since Attorney General Bondi took office in January 2011, in effect ignoring the more than 20 complaints lodged before she took office. However, OAG took action in other matters during Attorney General Bondi’s tenure based on complaints filed or investigations started before she assumed office. See, e.g., Roger Bull, *Attorney General: Beach Blvd. Automotive Put GPS on Cars, Repossessed Them Illegally*, *Florida Times-Union*, Oct. 11, 2011 (OAG complaint filed in October 2011 based on investigation launched in May 2010), available at <http://jacksonville.com/news/florida/2011-10-11/story/attorney-general-beach-blvd-automotive-put-gps-cars-repossessed-them>; Press Release, OAG, *Attorney General Reaches Agreement with XM Brands Over Deceptive Marketing Practices*, Jan. 6, 2011 (noting investigation began in December 2009 following consumer complaints), available at <http://www.myfloridalegal.com/newsrel.nsf/newsreleases/57B23A5ADB456D085257810006D1227>.

Institute.<sup>36</sup> OAG stated it had entered into an Assurance of Voluntary Compliance with the company in 2001 and tried to pursue the company for violating the settlement in 2009.<sup>37</sup> At that point, OAG said, it discovered the company was bankrupt and defunct, and closed the case.<sup>38</sup>

Over the next several years, OAG received more inquiries about the complaints and the New York lawsuit. Responding in 2015 and 2016, OAG insisted it had never said it was reviewing the allegations in the New York lawsuit to determine whether or not to join it and asserted that a staff member had made the decision not to investigate some complaints against Trump University because those could be resolved by the New York lawsuit.

For example, when *CBS News* asked in September 2015 about complaints filed against Trump University, OAG said it had received a total of four complaints between 2011 and 2014, and that “it was determined that all four complaints would be resolved by the New York Litigation, as this litigation was filed on behalf of consumers nationwide.”<sup>39</sup> In a March 4, 2016 response to the *Palm Beach Post*, OAG similarly asserted that because the New York lawsuit was filed on behalf of consumers nationwide, OAG “rightfully determined” a complaint filed in May 2011 “would be addressed” by that lawsuit.<sup>40</sup>

On March 14, 2016, OAG told the *Wall Street Journal* “[w]e never stated, nor would we have stated, that we were reviewing the allegations to determine whether or not to join a ‘multistate complaint’” because the New York lawsuit was not a multistate complaint.<sup>41</sup> The next day, OAG said Attorney General Bondi had not made any decisions on any complaints OAG received, but staff had. Commenting to *WMNF*, OAG asserted: “The Attorney General never made a decision as to whether to investigate the ONE complaint our office received during that time period. After a staff review of the ONE complaint, the decision was rightfully made by our Citizens Services office to refer the complainant to the New York Attorney General’s Office, as their lawsuit sought relief for any and all aggrieved consumers nationwide.”<sup>42</sup>

In recent weeks, OAG, Attorney General Bondi, and her representatives have repeated these assertions and further asserted Attorney General Bondi was not aware of any complaints when she solicited and received the contribution from the Trump Foundation. A spokesman for Attorney General Bondi, for example, told the *Associated Press* in early June 2016 she was unaware of any of complaints OAG received when she requested the donation, and OAG similarly told *CNN* Attorney General Bondi had “no idea” about any complaints against Donald

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<sup>36</sup> OAG PRA Response at 641.

<sup>37</sup> *Id.*

<sup>38</sup> *Id.*

<sup>39</sup> OAG PRA Response at 1432.

<sup>40</sup> OAG PRA Response at 1518.

<sup>41</sup> OAG PRA Response at 1529.

<sup>42</sup> OAG PRA Response at 1532 (emphasis in original).

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Trump at the time.<sup>43</sup> OAG also told *CNN* there was never an investigation and that staff had reviewed the complaints and New York lawsuit.<sup>44</sup> Attorney General Bondi herself told the *Tampa Bay Times* that “I never, nor was my office, investigating [Mr. Trump].”<sup>45</sup>

In addition, Attorney General Bondi has maintained that her office “has made public every document on this issue.”<sup>46</sup> However, as discussed above, the records produced to CREW in response to a public records request included few communications about whether OAG should investigate the complaints or whether it should join the lawsuit, and instead largely reflected communications about what OAG should tell the press about those issues. Furthermore, OAG’s response also apparently did not include any communications from Attorney General Bondi, and only a handful of emails to her. As a result, the records do not address substantial questions about OAG’s decisions. Agencies empowered to conduct thorough investigations, such as the Inspector General and the Commission on Ethics, therefore are needed to examine these decisions.<sup>47</sup>

### **Potential Violations**

#### **Unlawful Compensation or Reward for Official Behavior**

Under Florida law it is illegal for any public servant “to knowingly and intentionally request, solicit, accept, or agree to accept, any pecuniary or other benefit not authorized by law, for the past, present, or future performance, nonperformance, or violation of any act or omission . . . within the official discretion of the public servant.”<sup>48</sup> “Benefit” means any “gain or advantage, . . . including any commission, gift, property, commercial interest, or any other thing of economic value not authorized by law.”<sup>49</sup> A campaign contribution to an electioneering communications organization such as And Justice for All is a benefit under the statute.<sup>50</sup>

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<sup>43</sup> Horwitz, Fineout, and Biesecker, *Associated Press*, June 6, 2016; LoBianco, Griffin, and Zamost, *CNN*, June 10, 2016.

<sup>44</sup> *Id.*

<sup>45</sup> Steve Bousquet, Pam Bondi Breaks Her Silence Over Donald Trump’s \$25,000 Campaign Contribution, *Tampa Bay Times*, June 7, 2016, available at <http://www.tampabay.com/news/politics/stateroundup/pam-bondi-breaks-her-silence-over-donald-trumps-25000-campaign-contribution/2280665>.

<sup>46</sup> LoBianco, Griffin, and Zamost, *CNN*, June 10, 2016; Alex Leary, Bondi’s Office Looked At – But Did Not Investigate – Trump’s Ties to Questionable Business Owners, *Tampa Bay Times*, June 11, 2016, available at <http://www.tampabay.com/blogs/the-buzz-florida-politics/bondis-office-looked-at---but-did-not-investigate---trumps-ties-to/2281264>.

<sup>47</sup> See Fla. Stat. § 20.055(7) (Inspectors General authorized to investigate “misconduct” in state government and must report to law enforcement agencies when it has “reasonable grounds to believe there has been a violation of criminal law”); Fla. Stat. § 112.322 (Commission on Ethics authorized to investigate potential violations “of the code of ethics established in this part and of any other breach of the public trust”).

<sup>48</sup> Fla. Stat. § 838.016.

<sup>49</sup> Fla. Stat. § 838.014.

<sup>50</sup> *State v. Flansbaum-Talabisco*, 121 So. 3d 568, 574-75 (Fla. Dist. Ct. App. 2013).

Attorney General Bondi solicited a campaign contribution from Mr. Trump in August or September 2013. As of that time, OAG had received more than 20 complaints against Trump University and/or Trump Institute, and New York Attorney General Schneiderman filed a lawsuit against Trump University and Mr. Trump on August 25, 2013. The *Orlando Sentinel* published a news report on September 13 stating Attorney General Bondi's office was "reviewing the New York lawsuit's allegations, to determine whether Florida should join the multi-state case." Four days later, And Justice for All, an organization Attorney General Bondi established and maintained, accepted a \$25,000 contribution from the Trump Foundation, an organization controlled by Mr. Trump.

It remains unclear exactly what decisions regarding the complaints and lawsuits were made, when they were made, and why, but within several weeks of And Justice for All accepting the contribution, OAG effectively asserted it would not join the New York lawsuit or take similar legal action. OAG also may have decided around this time not to investigate the complaints. These decisions were within Attorney General Bondi's official discretion.

As a result, if Attorney General Bondi's solicitation or acceptance of the Trump Foundation's \$25,000 contribution to And Justice for All was linked to decisions to not investigate the complaints against Trump University/Trump Institute, or to not join the New York lawsuit or take similar legal action, she likely solicited or accepted unlawful compensation.

#### Improper Solicitation or Acceptance of Gifts

Florida's standards of conduct prohibit a public officer from "solicit[ing] or accept[ing] anything of value to the recipient, including a gift, loan, reward, promise of future employment, favor, or service, based upon any understanding that the vote, official action, or judgment of the public officer . . . would be influenced thereby."<sup>51</sup> If Attorney General Bondi's solicitation or acceptance of the Trump Foundation's \$25,000 contribution to And Justice for All was based on the understanding that her decisions with regard to investigating complaints against Trump University/Trump Institute or to joining the New York lawsuit or taking similar legal action would be influenced by the contribution, she likely improperly solicited or accepted a gift.

#### Unauthorized Compensation

Florida law, codified as the state standards of conduct for public officials, also prohibits a public officer from "accept[ing] any compensation, payment, or thing of value when such public officer. . . knows, or, with the exercise of reasonable care, should know, that it was given to influence a vote or other action in which the officer . . . was expected to participate in his or her official capacity."<sup>52</sup> If Attorney General Bondi accepted the Trump Foundation's \$25,000 contribution to And Justice for All and knew or should have known that it was given to influence

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<sup>51</sup> Fla. Stat. § 112.313(2).

<sup>52</sup> Fla. Stat. § 112.313(4).

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her decisions with regard to investigating complaints against Trump University/Trump Institute or with regard to joining the New York lawsuit or taking similar legal action, she likely accepted unauthorized compensation.

Misuse of Public Position

Florida's standards of conduct further prohibit a public officer from "corruptly us[ing] or attempt[ing] to use his or her official position . . . or perform his or her official duties, to secure a special privilege, benefit, or exemption for himself, herself, or others."<sup>53</sup> If Attorney General Bondi decided to not investigate complaints against Trump University/Trump Institute or to not join the New York lawsuit or take similar legal action in order to secure the Trump Foundation's \$25,000 contribution to And Justice for All, she likely misused her public position.

Conclusion

The available public record suggests Attorney General Bondi's solicitation and acceptance of a \$25,000 campaign contribution from Mr. Trump's private foundation may be linked to decisions to not investigate complaints against Trump University/Trump Institute, or to not join the New York lawsuit or take similar legal action. The Inspector General and the Commission on Ethics should commence an immediate investigation to determine if Florida's laws and standard of conduct for public officials were violated.

Thank you for your prompt attention to this matter.

Sincerely,

A handwritten signature in dark ink, appearing to read 'Noah Bookbinder', with a stylized, flowing script.

Noah Bookbinder  
Executive Director  
Citizens for Responsibility and Ethics in Washington  
455 Massachusetts Ave., NW, Sixth Floor  
Washington, D.C. 20001  
(202) 408-5565 (phone)  
(202) 588-5020 (fax)

Encl.

---

<sup>53</sup> Fla. Stat. § 112.313(6).



# **EXHIBIT A**

# NYS Department of State

## Division of Corporations

### Entity Information

The information contained in this database is current through July 1, 2016.

---

Selected Entity Name: TRUMP UNIVERSITY LLC

Selected Entity Status Information

**Current Entity Name:** THE TRUMP ENTREPRENEUR INITIATIVE LLC

**DOS ID #:** 3117713

**Initial DOS Filing Date:** OCTOBER 25, 2004

**County:** NEW YORK

**Jurisdiction:** NEW YORK

**Entity Type:** DOMESTIC LIMITED LIABILITY COMPANY

**Current Entity Status:** ACTIVE

Selected Entity Address Information

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

THE TRUMP ENTREPRENEUR INITIATIVE LLC

40 WALL ST

32ND FL

NEW YORK, NEW YORK, 10005

**Registered Agent**

NATIONAL REGISTERED AGENTS, INC.

111 EIGHTH AVENUE

NEW YORK, NEW YORK, 10011

This office does not require or maintain information regarding the names and addresses of members or managers of nonprofessional limited liability companies. Professional limited liability companies must include the name(s) and address(es) of the original members, however this information is not recorded and only available by [viewing the certificate](#).

**\*Stock Information**

# of Shares	Type of Stock	\$ Value per Share
-------------	---------------	--------------------

No Information Available

\*Stock information is applicable to domestic business corporations.

**Name History**

Filing Date	Name Type	Entity Name
MAY 21, 2010	Actual	THE TRUMP ENTREPRENEUR INITIATIVE LLC
OCT 25, 2004	Actual	TRUMP UNIVERSITY LLC

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.

[Search Results](#) [New Search](#)

[Services/Programs](#) | [Privacy Policy](#) | [Accessibility Policy](#) | [Disclaimer](#) | [Return to DOS](#)  
[Homepage](#) | [Contact Us](#)

## **EXHIBIT B**

**ELECTIONEERING COMMUNICATION  
STATEMENT OF ORGANIZATION**

(PLEASE TYPE)

13 AUG -6 PM 2:00

DIVISION OF ELECTIONS  
SECRETARY OF STATE

OFFICE USE ONLY

**1. Full Name of Organization**

And Justice For All

Telephone

813/254-3369

Mailing Address (include city, state and zip code)

610 South Boulevard, Tampa, Florida 33606

Street Address (include city, state and zip code)

610 South Boulevard, Tampa, Florida 33606

**2. Affiliated or Connected Organizations**

Name of Affiliated or Connected Organization	Mailing Address	Relationship
Justice for All	610 South Boulevard Tampa, Florida 33606	Affiliated organization

**3. Area, Scope and Jurisdiction of the Organization**

Statewide electioneering communications organization to identify and discuss candidates for statewide, multi-county, legislative, county and municipal elective offices and other activities not prohibited by law.

**4. Identify by Name, Address and Position, the Custodian of Books and Accounts for the Organization**

Full Name	Mailing Address	Street Address	Title or Position
Nancy Watkins	610 South Boulevard Tampa, Florida 33606	610 South Boulevard Tampa, Florida 33606	Treasurer
Robert Watkins			Deputy Treasurer

**5. List by Name, Mailing and Street Address, and Position, Other Principal Officers, Including the Treasurer and Deputy Treasurer, if Any (Include the Top-ranking Officer's (e.g., Chairperson) Name and Information)**

Full Name	Mailing Address	Street Address	Title or Position
Carlos Alfonso	610 South Boulevard Tampa, Florida 33606	610 South Boulevard Tampa, Florida 33606	Chair

**6. In the Event of Dissolution, What Disposition will be Made of the Residual Funds?**

Contribute to electioneering communications organizations or other activities not prohibited by law.

**7. List All Banks, Safety Deposit Boxes, or Other Depositories Used by this Organization for Electioneering Communications**

Name of Bank or Depository	Mailing Address
Bank of Tampa	Post Office Box One Tampa, Florida 33601

**8. List All Reports Required to be Filed by this Organization with Federal Officials, and the Names, Addresses, and Positions of Such Officials, if Any**

Report Title	Dates Required to be Filed	Name & Position of Official	Mailing Address
Form 8871 Form 1120POL Form 990, as may be required	Upon formation March 15, annually May 15, annually	Internal Revenue Service	Ogden, UT 84201

STATE OF <sup>Florida</sup>

Hillsborough

COUNTY

I, Carlos Alfonso

, certify that the information in this Statement

of Organization is complete, true, and correct.

x

  
Signature of Top-ranking Principal Officer of Organization

8/5/13

Date



COATES LAW FIRM, PL  
ATTORNEYS AT LAW

RICHARD E. COATES  
EMMETT MITCHELL, IV  
ROGER N. BEAUBIEN

NOREEN A. FENNER\*  
\*Not an attorney

August 6, 2013

RECEIVED  
13 AUG -6 PM 2:00  
115 EAST PARK AVENUE, SUITE 1  
TALLAHASSEE, FLORIDA 32301  
(850) 681-1029  
FAX (904) 248-9038  
DIVISION OF ELECTIONS  
SECRETARY OF STATE

VIA HAND DELIVERY

Ms. Kristi Bronson  
Division of Elections  
RA Gray Building  
Tallahassee, Florida 32399

RE: And Justice for All

Dear Kristi:

Enclosed for filing are the documents required to form an electioneering communications organization entitled And Justice for All, together with a Statement of Solicitation for Pam Bondi

Please let us know when the Division of Elections certifies the entity or if you need any additional information. Thank you for your assistance.

Sincerely,



Richard E. Coates

Enclosures

## **EXHIBIT C**

# STATEMENT OF SOLICITATION

(Section 106.0701, Florida Statutes)

RECEIVED  
13 AUG -6 PM 2:00

DIVISION OF ELECTIONS  
SECRETARY OF STATE

## Office Use Only

Tracking: \_\_\_\_\_

Account: \_\_\_\_\_

## PART A

☒ Office Holder: Cabinet Officer

☒ Candidate: Cabinet Officer

Name

Pam Bondi

Telephone

Mailing Address

Email Address

City

State

Zip Code

Name of Organization

And Justice for All

## PART B

Relationship Between Office Holder or Candidate and Organization  
(in whole or in part): Established/Maintain

Organization Type:

527

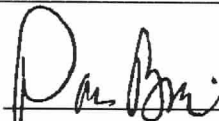
## PART C

Web Address as Required by Section 106.0701(3), F.S. (if website has not been created, put "To be determined") AndJusticeForAllFL.com

## PART D

8/5/13

Date



Signature of Office Holder or Candidate

## INSTRUCTIONS FOR COMPLETING AND FILING FORM DS-DE 102 STATEMENT OF SOLICITATION

### Introductory Information

As this form utilizes drop-down menus, you must enter the information directly on the form prior to printing. After printing, sign the document. Fax or mail **PAGE 1** of the form to the **Division of Elections, Bureau of Election Records, R. A. Gray Building, Room 316, 500 South Bronough Street, Tallahassee, Florida 32399-0250; Fax Number 850-245-6259.**

### Who Must File Form DS-DE 102

The Governor, Lieutenant Governor, members of the Cabinet, state legislators, or candidates for such offices who directly or indirectly solicit, cause to be solicited, or accept any contribution on behalf of an organization that is exempt from taxation under s. 527 or s. 501(c)(4) of the Internal Revenue Code, which such individuals, in whole or in part, establish, maintain, or control, must file Form DS-DE 102.

## **EXHIBIT D**

**Political Organization  
Notice of Section 527 Status**

OMB No. 1545-1693

**Part I General Information**

**1 Name of organization**

And Justice For All

**Employer identification number**

90 - 1009132

**2 Mailing address (P.O. box or number, street, and room or suite number)**

610 S. Boulevard

**City or town, state, and ZIP code**

Tampa, FL 33606 -

**3 Check applicable box:** ☒ Initial notice ☐ Amended notice ☐ Final notice

**4a Date established**

08/06/2013

**4b Date of material change**

08/07/2013

**5 E-mail address of organization**

no@email

**6a Name of custodian of records**

Nancy H. Watkins

**6b Custodian's address**

610 S. Boulevard

Tampa, FL 33606 -

**7a Name of contact person**

Carlos Alfonso

**7b Contact person's address**

610 S. Boulevard

Tampa, FL 33606 -

**8 Business address of organization (if different from mailing address shown above). Number, street, and room or suite number**

610 S. Boulevard

**City or town, state, and ZIP code**

Tampa, FL 33606 -

**9a Election authority**

FL

**9b Election authority identification number**

60771

**Part II Notification of Claim of Exemption From Filing Certain Forms (see instructions)**

**10a** Is this organization claiming exemption from filing Form 8872, Political Organization Report of Contributions and Expenditures, as a qualified state or local political organization? Yes ☒ No ☐

**10b** If 'Yes,' list the state where the organization files reports: FL

**11** Is this organization claiming exemption from filing Form 990 (or 990-EZ), Return of Organization Exempt from Income Tax, as a caucus or associations of state or local officials? Yes ☐ No ☒

---

**Part III Purpose**

---

**12 Describe the purpose of the organization**

To accept contributions and make expenditures for exempt activity as described in Section 527 of the Internal Revenue Code.



**Part IV List of All Related Entities** (see instructions)**13 Check if the organization has no related entities**

14a Name of related entity	14b Relationship	14c Address
Justice for All	Affiliated	610 S. Boulevard Tampa, FL 33606 -

**Part V List of All Officers, Directors, and Highly Compensated Employees** (see instructions)

15a Name	15b Title	15c Address
Robert I. Watkins	Deputy Treasurer	610 S. Boulevard Tampa, FL 33606 -
Nancy H. Watkins	Treasurer	610 S. Boulevard Tampa, FL 33606 -
Carlos Alfonso	Chairman	610 S. Boulevard Tampa, FL 33606 -

Under penalties of perjury, I declare that the organization named in Part I is to be treated as a tax-exempt organization described in section 527 of the Internal Revenue Code, and that I have examined this notice, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete. I further declare that I am the official authorized to sign this report, and I am signing by entering my name below.

Nancy H. Watkins

08/07/2013

**Sign  
Here**

Name of authorized official



Date

# **EXHIBIT E**



# Florida Department of State Division of Elections

## Contributions Query Results

About the Campaign Finance Data Base  
If all contributions for a reporting period are less than 1 dollar they may not be displayed.

### Search Criteria:

Detail of Committees

Election Year: 2014 General Election

With Candidate Last Name Starts With: And justice for all

Committee Type: All

Candidate/Committee	Date	Amount	Typ	Contributor Name	Address	City	State	Zip	Occupati
And Justice For All (ECO)	12/10/2013	1,000.00	CHE	BI SERVICES	P. O. BOX 25207	BRADENTON, FL 34206			RETAIL
And Justice For All (ECO)	08/27/2013	2,500.00	CHE	BLUE CROSS AND BLUE SHIELD OF FLORIDA	P. O. BOX 2210	JACKSONVILLE, FL 32203			HEALTH C
And Justice For All (ECO)	09/23/2013	500.00	CHE	BROAD AND CASSELL	390 N. ORANGE AVENUE, #1400	ORLANDO, FL 32801			LAW FIRB
And Justice For All (ECO)	09/11/2013	2,500.00	CHE	BROWN LORI C.	8820 SOUTHERN BREEZE DRIVE	DAVENPORT, FL 32801			COMMUNIT
And Justice For All (ECO)	08/27/2013	500.00	CHE	CCI COMPANIES, LLC	220 ALHAMBRA CIRCLE, #304	CORAL GABLES, FL 33134			BEVERAGE
And Justice For All (ECO)	09/24/2013	2,500.00	CHE	CESAR DE B CHAMPION ROBERT	1016 PONTE VEDRA BLVD.	PONTE VEDRA BEACH, FL 32082			FINANCIA
And Justice For All (ECO)	09/10/2013	2,500.00	CHE	CHARTER SCHOOLS USA, INC.	6245 N. FEDERAL HIGHWAY, 5TH F	FORT LAUDERDALE, FL 33308			EDUCATIC
And Justice For All (ECO)	09/27/2013	754.00	CHE	COLUMBIA RESTAURANT	2025 E. 7TH AVENUE	TAMPA, FL 33605			RESTAUR
And Justice For All (ECO)	09/27/2013	1,000.00	CHE	CRISER MARSHALL M.	5860 S.W. 118TH STREET	CORAL GABLES, FL 33156			TELECOM
And Justice For All (ECO)	09/22/2013	2,500.00	CHE	CULLEY'S MEADOWOOD FUNERAL HOME	1737 RIGGINS ROAD	TALLAHASSEE, FL 32308			FUNERAL
And Justice For All (ECO)	10/03/2013	2,500.00	CHE	DENMARK CECILIA I.	635 SPICE TRADER WAY, #6	ORLANDO, FL 32818			COMMUNIT
And Justice For All (ECO)	09/30/2013	10,000.00	CHE	ETC CAPITAL, LLC	38955 HILLS TECH DRIVE	FARMINGTON HILLS, MI 48328			PRINTING
And Justice For All (ECO)	12/13/2013	5,000.00	CHE	FACEBOOK, INC.	P. O. BOX 2421	JACKSONVILLE, FL 32203			INVESTME
And Justice For All (ECO)	03/10/2014	-5,000.00	REF	FACEBOOK, INC.	1601 WILLOW ROAD	ORLANDO, FL 32818			SOCIAL Y
And Justice For All (ECO)	10/16/2013	25,000.00	CHE	FLORIDA BLUE	P. O. BOX 2210	JACKSONVILLE, FL 32203			INSURANC
And Justice For All (ECO)	09/30/2013	50,000.00	CHE	FLORIDA CHAMBER OF COMMERCE ALLIANCE, IN	P. O. BOX 11309	MENLO PARK, CA 94025			POLITIC
And Justice For All (ECO)	12/10/2013	25,000.00	CHE	FLORIDA CHAMBER OF COMMERCE ALLIANCE, IN	P. O. BOX 11309	JACKSONVILLE, FL 32302			POLITIC
And Justice For All (ECO)	11/14/2013	25,000.00	CHE	FLORIDA CHAMBER OF COMMERCE ALLIANCE, IN	P. O. BOX 11309	TALLAHASSEE, FL 32302			POLITIC
And Justice For All (ECO)	08/28/2013	10,000.00	CHE	FLORIDA CHAMBER OF COMMERCE ALLIANCE, IN	P. O. BOX 11309	TALLAHASSEE, FL 32302			POLITIC
And Justice For All (ECO)	09/25/2013	25,000.00	CHE	FLORIDA POWER & LIGHT COMPANY	700 UNIVERSITY BLVD.	JUNO BEACH, FL 33408			UTILITIE
And Justice For All (ECO)	09/24/2013	2,500.00	CHE	GERALD G. GLASS, P.A.	2901 S.W. 149TH AVENUE, #400	MIRAMAR, FL 33027			LAW FIRB
And Justice For All (ECO)	08/23/2013	5,000.00	CHE	GOLD COAST BEVERAGE DISTRIBUTORS	10055 N.W. 12TH STREET	JACKSONVILLE, FL 32202			BEVERAGE
And Justice For All (ECO)	08/27/2013	1,500.00	CHE	HEAVENER JAMES W.	111 RIVERSIDE AVENUE	DORAL, FL 33172			GENERAL
And Justice For All (ECO)	09/10/2013	20,000.00	CHE	HEAVENER JAMES W.	3300 UNIVERSITY BLVD., #218	JACKSONVILLE, FL 32202			WINTER PARK, FL 32792
And Justice For All (ECO)	09/10/2013	25,000.00	CHE	HENDERSON GREGORY L.	P. O. BOX 2677	BRANDON, FL 33509			PHYSICIA
And Justice For All (ECO)	09/24/2013	2,500.00	CHE	HERITAGE TITLE INSURANCE AGENCY, INC.	110 S.E. 6TH STREET, #1500	FORT LAUDERDALE, FL 33301			INVESTME
And Justice For All (ECO)	11/10/2013	5,000.00	CHE	HORIZON SHEPHERD, LLC	1306 W. KENNEDY BLVD.	WASHINGTON, DC 20006			ATTORNEY
And Justice For All (ECO)	08/14/2013	1,000.00	CHE	KALANI LORI E.	1825 EVE STREET, N.W.	TAMPA, FL 33606			NAPLES, FL 33409
And Justice For All (ECO)	09/24/2013	25,000.00	CHE	KITILEY JOHN	339 S. PLANT AVENUE	ORLANDO, FL 32819			HEALTH C
And Justice For All (ECO)	10/01/2013	5,000.00	CHE	LEVINE ALAN	9995 THE LAKE	MIAMI, FL 33156			GOVT. RE
And Justice For All (ECO)	09/27/2013	500.00	CHE	LUCAS MICHELLE H.	7380 SAND LAKE ROAD, #500	NORTH PALM BEACH, FL 33410			LAW FIRB
And Justice For All (ECO)	10/31/2013	500.00	CHE	LYONS PETER C.	11141 S.W. 64TH AVENUE	MIAMI, FL 33156			SUPPLY C
And Justice For All (ECO)	11/29/2013	7,000.00	CHE	MARK F. RAYMOND, P.A.	2 S. BISCAYNE BLVD., 21ST FLOOR	MIAMI, FL 33131			HEALTH C
And Justice For All (ECO)	09/30/2013	10,000.00	CHE	MCA HEALTH CARE HOLDINGS, LLC	P. O. BOX 6115	TEMPLE, TX 76503			TRADE AS
And Justice For All (ECO)	11/10/2013	500.00	CHE	MCA HEALTH CARE HOLDINGS, LLC	200 W. CYPRUS CREEK ROAD, #50	WASHINGTON, DC 20005			POLITIC
And Justice For All (ECO)	09/24/2013	5,000.00	CHE	PALM BEACH COUNTY FIREPAC PC	1401 K STREET, N.W., #502	FORT LAUDERDALE, FL 33309			EDUCATIC
And Justice For All (ECO)	08/19/2013	25,000.00	CHE	PINEHILL CAPITAL PARTNERS, LTD.	2228 S. CONGRESS AVENUE, #2-C	TAMPA, FL 33606			INVESTME
And Justice For All (ECO)	11/18/2013	8,000.00	CHE	PROSPERITY FLORIDA PC	1900 W. COMMERCIAL BLVD., #180	WASHINGTON, DC 20004			TRADE AS
And Justice For All (ECO)	12/13/2013	50,000.00	CHE	RECORDING INDUSTRY ASSOC. OF AMERICA, IN	1700 S. MACDILL AVENUE, #240	WASHINGTON, DC 20004			POLITIC
And Justice For All (ECO)	09/23/2013	500,000.00	CHE	REPUBLICAN STATE LEADERSHIP COMM.-FLA.	610 S. BOULEVARD	WASHINGTON, DC 20004			LAW FIRB
And Justice For All (ECO)	09/06/2013	2,718.40	INK	RONALD L. BOOK, P.A.	1201 F STREET, N.W., #675	WASHINGTON, DC 20004			LAW FIRB
And Justice For All (ECO)	09/10/2013	1,500.00	CHE	RONALD L. BOOK, P.A.	P 1201 F STREET, N.W., #675	WASHINGTON, DC 20004			LAW FIRB
And Justice For All (ECO)	09/10/2013	1,500.00	CHE	RONALD L. BOOK, P.A.	18851 N.E. 29TH AVENUE, #1010	AVENTURA, FL 33180			LAW FIRB

3/18/2016

Contributions Query Results - Division of Elections - Florida Department of State

And Justice For All (ECO)	10/01/2013	5,000.00	CHE ROOD JOHN D.	3030 HARTLEY ROAD, #310	JACKSONVILLE, FL 32257	REAL EST
And Justice For All (ECO)	09/27/2013	500.00	CHE RSC EQUITY, LLC	390 N. ORANGE AVENUE, #1400	ORLANDO, FL 32801	EQUITY
And Justice For All (ECO)	08/27/2013	2,500.00	CHE RUMWELL PETER S.	2538 RIVER ROAD	JACKSONVILLE, FL 32207	REAL EST
And Justice For All (ECO)	11/10/2013	1,000.00	CHE STATESTIDE ASSOCIATES, INC.	2300 CLARENDON BLVD., #407	ARLINGTON, VA 22201	GOVT. RE
And Justice For All (ECO)	10/02/2013	4,000.00	CHE STRATEGOS PUBLIC AFFAIRS, LLC	5550 W. EXECUTIVE DRIVE, #550	TAMPA, FL 33609	PUBLIC F
And Justice For All (ECO)	10/08/2013	10,000.00	CHE STRAZ JR. DAVID A.	4401 W. KENNEDY BLVD., #150	TAMPA, FL 33609	BANKER
And Justice For All (ECO)	10/17/2013	7,500.00	CHE SUNSHINE GASOLINE DISTRIBUTORS, INC.	1650 N.W. 57TH AVENUE	MIAMI, FL 33172	PETROLEU
And Justice For All (ECO)	09/17/2013	25,000.00	CHE THE DONALD J. TRUMP FOUNDATION, INC.	725 5TH AVENUE	NEW YORK, NY 10022	FOUNDATI
And Justice For All (ECO)	08/27/2013	2,500.00	CHE THE HORNE GROUP	P. O. BOX 8339	FLEMING ISLAND, FL 32006	GOVT. RE
And Justice For All (ECO)	09/10/2013	10,000.00	CHE THOMAS ROBERT M.	P. O. BOX 784	TALLAHASSEE, FL 32302	POLITICA
And Justice For All (ECO)	09/30/2013	1,000.00	CHE TRANDOTCOM SOLUTIONS, LLC	50 RANCH ROAD	THONOTOSASSA, FL 33592	RANCH EX
And Justice For All (ECO)	09/24/2013	5,000.00	CHE TRIPP SCOTT	2425 WEST LOOP, S., #800	HOUSTON, TX 77027	SOFTWARE
And Justice For All (ECO)	09/16/2013	10,000.00	CHE UNITED STATES SUGAR CORPORATION	110 S.E. 6TH STREET, 15TH FLOO	FORT LAUDERDALE, FL 33301	LAW FIRN
And Justice For All (ECO)	09/27/2013	2,500.00	CHE WASTE MANAGEMENT, INC. OF FLORIDA	111 PONCE DE LEON AVENUE	CLEWISTON, FL 33440	SUGAR
And Justice For All (ECO)	09/11/2013	1,000.00	CHE ZENKER JENNIFER A.	2700 N.W. 48TH STREET	POMPANO BEACH, FL 33073	WASTE MA
				205 W. 84TH STREET, #B	NEW YORK, NY 10024	ATTORNEY
63 Contribution(s) Selected	Total:	1,027,582.40				

Query the Campaign Finance Data Base

[Department of State] [Division of Elections] [Campaign Finance - Contributions]

## **EXHIBIT F**

Form **990-PF**

Department of the Treasury  
Internal Revenue Service

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

- ▶ **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](http://www.irs.gov/form990pf).**

OMB No 1545-0052

**2013**

**Open to Public Inspection**

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

<b>Name of foundation</b> THE DONALD J TRUMP FOUNDATION		<b>A Employer identification number</b> 13-3404773						
<b>Number and street (or P O box number if mail is not delivered to street address)</b> C/O WEISERMAZARS LLP 60 CROSSWAYS PK DR NO 301		<b>B Telephone number (see instructions)</b> (212) 715-7231						
<b>Room/suite</b> (blank)								
<b>City or town, state or province, country, and ZIP or foreign postal code</b> WOODBURY, NY 11797		<b>C If exemption application is pending, check here</b> ▶ <input type="checkbox"/>						
<b>G Check all that apply</b> <table style="width:100%; border: none;"> <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	<b>D 1. Foreign organizations, check here</b> ▶ <input type="checkbox"/> <b>2. Foreign organizations meeting the 85% test, check here and attach computation</b> ▶ <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							
<b>H Check type of organization</b> <table style="width:100%; border: none;"> <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><input type="checkbox"/> Other taxable private foundation</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	<input type="checkbox"/> Other taxable private foundation	<b>E If private foundation status was terminated under section 507(b)(1)(A), check here</b> ▶ <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	<input type="checkbox"/> Other taxable private foundation							
<b>I Fair market value of all assets at end of year (from Part II, col. (c), line 16) ▶ \$ 1,369,746</b>		<b>F If the foundation is in a 60-month termination under section 507(b)(1)(B), check here</b> ▶ <input type="checkbox"/>						
<b>J Accounting method</b> <table style="width:100%; border: none;"> <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)		565,832			
	2	Check <input type="checkbox"/> if the foundation is <b>not</b> 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					
Operating and Administrative Expenses	b	Less Cost of goods sold . . . . .					
	c	Gross profit or (loss) (attach schedule) . . . . .					
	11	Other income (attach schedule) . . . . .					
	12	<b>Total.</b> Add lines 1 through 11 . . . . .		569,865	4,033		
	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	<b>Total operating and administrative expenses.</b> Add lines 13 through 23 . . . . .		5,305	0		5,305	
25	Contributions, gifts, grants paid . . . . .		913,075			913,075	
26	<b>Total expenses and disbursements.</b> Add lines 24 and 25		918,380	0		918,380	
27	Subtract line 26 from line 12						
a	<b>Excess of revenue over expenses and disbursements</b>		-348,515				
b	<b>Net investment income</b> (if negative, enter -0-)			4,033			
c	<b>Adjusted net income</b> (if negative, enter -0-)						



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

<b>5a</b> 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))?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
(2)	Influence the outcome of any specific public election (see section 4955), or to carry on, directly or indirectly, any voter registration drive?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
(3)	Provide a grant to an individual for travel, study, or other similar purposes?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> 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).	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> 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?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
<b>b</b>	If any answer is "Yes" to 5a(1)–(5), did <b>any</b> 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)?		<b>5b</b>	
	Organizations relying on a current notice regarding disaster assistance check here.	<input checked="" type="checkbox"/>		
<b>c</b>	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?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
	If "Yes," attach the statement required by Regulations section 53.4945–5(d).			
<b>6a</b>	Did the foundation, during the year, receive any funds, directly or indirectly, to pay premiums on a personal benefit contract?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
<b>b</b>	Did the foundation, during the year, pay premiums, directly or indirectly, on a personal benefit contract?		<b>6b</b>	No
	If "Yes" to 6b, file Form 8870.			
<b>7a</b>	At any time during the tax year, was the foundation a party to a prohibited tax shelter transaction?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
<b>b</b>	If yes, did the foundation receive any proceeds or have any net income attributable to the transaction?		<b>7b</b>	

**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