

**IN THE UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF NEW YORK**

CITIZENS FOR RESPONSIBILITY AND  
ETHICS IN WASHINGTON, RESTAURANT  
OPPORTUNITIES CENTERS (ROC)  
UNITED, INC., JILL PHANEUF, and ERIC  
GOODE,

*Plaintiffs,*

v.

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

*Defendant.*

Civil Action No. 1:17-cv-00458-GBD

**DECLARATION OF DEEPAK GUPTA**

I, Deepak Gupta, declare as follows:

1. I am an attorney for the plaintiffs in this case, founding principal of the law firm Gupta Wessler PLLC, and a member in good standing of the bar of the District of Columbia. I submit this declaration in support of the plaintiffs' opposition to the defendant's motion to dismiss.

2. Attached is a true and correct copy of an unpublished draft article by John Mikhail entitled *The Definition of 'Emolument' in English Language and Legal Dictionaries, 1523-1806*. In an appendix that is also attached, the article includes over 100 original images of English and legal dictionaries published between 1523 and 1806 and complete transcripts and tables of the definitions contained therein. I obtained this document from the Social Science Research Network ([https://papers.ssrn.com/sol3/papers.cfm?abstract\\_id=2995693](https://papers.ssrn.com/sol3/papers.cfm?abstract_id=2995693)).

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

*/s/ Deepak Gupta*

Dated: August 4, 2017

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Deepak Gupta