

**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-RA

DECLARATION OF JILL PHANEUF

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I, Jill Phaneuf, submit this declaration to describe my efforts to book government events at two Kimpton Hotels in Washington, D.C., the Carlyle Hotel and the Glover Park Hotel. The statements in this declaration are based on my personal knowledge.

1. I am a resident of Washington, D.C. and I book and curate events for the Carlyle Hotel and the Glover Park Hotel. In particular, I aim to book embassy functions, political functions involving foreign governments, and functions for organizations that are associated with foreign governments at the Carlyle Hotel and the Glover Park Hotel. My compensation is determined as a percentage of the gross receipts of the events that I book for these hotels.

The Carlyle Hotel

2. The Carlyle Hotel is located just north of Dupont Circle at 1731 New Hampshire Avenue, Northwest. The Carlyle Hotel is a ten to fifteen-minute taxi or Uber ride from the Trump International Hotel Washington, D.C. I believe the event spaces at the Carlyle Hotel

compete directly for corporate, government, and transient banquet business with event spaces at the Trump International Hotel Washington, D.C.

3. There are approximately 183 government buildings within a two-mile radius of the Carlyle, including 151 embassies, 26 federal government buildings, and six municipal buildings. These government buildings host a variety of events and meetings attended by government officials from both foreign and domestic governments.

4. The Carlyle provides 2,800 square feet of contemporary art-deco inspired and green event space for business and social events. The space is adaptable for a range of uses, including film screenings, fundraisers, book signings, photo shoots and gallery showings. The Carlyle is equipped with the necessary multimedia for business and social events, including high-speed internet, ultramodern A/V equipment, and tech support.

5. Events are catered by the Riggsby, the Carlyle's on-site restaurant featuring upscale American fare by James Beard award-winning chef Michael Schlow. Event guests also can choose from an impressive beverage selection, including options for cocktail demonstrations or sommelier-led wine tasting.

6. The Riggsby projects an intimate and nostalgic yet refined ambiance with its unique "key hole" shaped doorway, open kitchen, wood tables, leather booths, brass finishes, and whimsical décor, including custom designed wallpaper that highlights original artwork by renowned artist Adrienne Schlow. The Washingtonian named the Riggsby one of the "100 Very Best Restaurants" in the D.C. area in 2016. The Washington Post described the Riggsby as the "new glam supper club" and rated it 2.5 out of 3 stars.

7. Chef Schlow has restaurants spanning the country and is one of the most influential and respected chefs in America. He has appeared on the Tonight Show with Jimmy Fallon, Bravo's Top Chef Masters, The Today Show, Good Morning America, The Rachel Ray Show, CBS This Morning, Nightline, and the Food Network. He has received numerous awards, including being named "Best Chef in the Northeast" by the James Beard Foundation, "Best Chef in the Country" by Sante Magazine, and receiving Robert Mondavi's "Culinary

Award of Excellence” which is given to only six recipients a year. His restaurants have been recognized as some of the best in the world by Esquire, Food & Wine, Conde Nast Traveler, and Gourmet. He is the author of the cookbook, *It's About Time, Great Recipes for Everyday Life*, and is regularly requested to appear and speak at events and to the media about the restaurant and hospitality industry.

8. Multiple spaces are available for private events at the Carlyle Hotel, including the Ellington room, the Fitzgerald room, and the Taylor room.

9. The Ellington is a naturally lit, 630 square foot space complete with a large table, elegant white and brass chairs, and art-covered dark wood and maroon walls. It can accommodate 27 to 60 guests. The room includes an 80-inch TV and wall speakers for presentations. The space can be used for business meetings, cocktail receptions, or elegant candle-lit dinners. I believe the Ellington competes directly for corporate, government, and transient banquet business with event spaces at the Trump International Hotel Washington D.C.

10. The Taylor is a spacious 1,473 square foot space that can accommodate up to 120 people. The Taylor features exposed brick walls, plush emerald green arm chairs, elegant brass bottomed standing lamps, a large art deco inspired print of the Capitol building, three built-in projection screens, speakers wired throughout the room, and a serving area for bars and buffets. I believe the Taylor competes directly for corporate, government, and transient banquet business with event spaces at the Trump International Hotel Washington D.C.

11. The Fitzgerald is right off the main dining room of the Riggsby. It is a 250 square foot private dining room with a low lit speakeasy feel that has dark wood lining, leather seating, and art covered walls. It can accommodate 12 guests. I believe the Fitzgerald competes directly for corporate, government, and transient banquet business with event spaces at the Trump International Hotel Washington D.C.

The Glover Park Hotel

12. The Glover Park Hotel is located in upper Georgetown at 2505 Wisconsin Avenue Northwest, near “Embassy Row” on Massachusetts Avenue. The Glover Park Hotel is a fifteen

to twenty-minute taxi or Uber ride from the Trump International Hotel Washington D.C., depending on traffic. I believe the event spaces at the Glover Park Hotel compete directly for corporate, government and transient banquet business with event spaces at the Trump International Hotel Washington, D.C.

13. The Glover Park Hotel is perched on a hill above a tree-lined, picturesque neighborhood and provides impressive panoramic views of the District. The hotel blends metropolitan edge with familial comfort and tranquility and features creative design pieces, including a custom map of D.C.'s Rock Creek Park on the property's eight story façade, original mixed-media artwork, handmade light fixtures, and a variety of natural textiles throughout the communal spaces. The Glover Park Hotel provides the necessary multimedia for business and social events, including wireless internet throughout the premises and audio visual support.

14. There are 151 government buildings within a two-mile radius of the Glover Park Hotel, including 149 embassies and two municipal buildings. These government buildings host a variety of events and meetings attended by government officials from both foreign and domestic governments.

15. The Glover Park Hotel provides 3,800 square feet of contemporary event space for business and social events. The space is adaptable for a range of uses, including meetings, cocktail receptions, and large dinner parties.

16. Events are catered by the Casolare, the Glover Park Hotel's on-site restaurant featuring James Beard award-winning chef Michael Schlow. Casolare offers fresh, seasonal, and healthful cuisine that finds its roots in Southern Italy. The menu is inspired by the Italian tradition that "simple is better" and offers exceptional, flavorful, authentic food in a comfortable and approachable setting. The Washington Post described the restaurant as "a little piece of Puglia [a region in southern Italy] moved into Casolare" and lauded the restaurant for its fresh and quality ingredients. The restaurant features a large wooden bar, white hanging light fixtures, and Tuscan inspired tiled walls.

17. There are four spaces available for private events – the Cocktail Garden, the Walnut Ballroom, the Walnut East Room, and the Walnut West Room.

18. The Cocktail Garden is a 2,000 square foot garden with lush greenery interspersed with lavender, rosemary, and thyme. In the evening, guests can enjoy cocktails under white tents dressed with bistro lights, and with lit lanterns hanging among garden benches. Guests can drink crafted cocktails, punches, and refreshers, as well as a selection of beer and wine. Guests can also eat savory small bites such as watermelon and arugula salad, zucchini pizza with pistachio pesto, and charcuterie and cheese. The Cocktail Garden can accommodate up to 150 people.

19. The Walnut Ballroom is an expansive 1,860 square foot ballroom featuring large floor to ceiling windows, along with white and light wood accents and low lighting. The room features unique wooden art installations that hang from the ceiling. The Walnut Ballroom can accommodate up to 200 people. The room can be arranged to accommodate meetings, cocktail receptions, or a large dinner party. The Walnut Ballroom can be divided into the Walnut East room and the Walnut West room, for event customers seeking a smaller space.

Government Business

20. I started my position booking and curating events for the Carlyle Hotel and the Glover Park Hotel in April 2017.

21. I am actively seeking to book and curate numerous events at the Carlyle Hotel and the Glover Park Hotel for foreign and domestic governmental officials and entities.

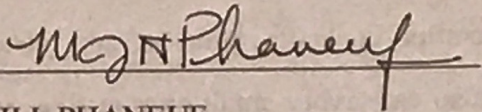
22. I have reached out to the Russian Embassy to organize an evening cocktail reception at the Glover Park Hotel. The Russian Embassy is across the street from the Glover Park Hotel.

23. I met with a senior coordinator for the Japanese Embassy who was interested in renting the Cocktail Garden of the Glover Park Hotel for an event.

24. I have reached out to an organization associated with the Government of Saudi Arabia to book a roundtable event at the Glover Park Hotel.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Executed this 2 day of August 2017.


JILL PHANEUF