

August 10, 2020

District Attorney Cyrus Vance
Manhattan District Attorney's Office
One Hogan Place
New York, NY 10013

Re: Falsified Trump Organization Financials

Dear District Attorney Vance,

In light of reports that the Manhattan District Attorney's office is investigating the Trump Organization's inflation of assets and potential bank and insurance fraud, the American Democracy Legal Fund would like to provide you with our research involving the Trump Organization's history of inflation regarding its overseas golf courses.

The Trump Organization has repeatedly reported fraudulent financial details to the U.S. Office of Government Ethics, while reporting a different set of numbers to UK and Irish regulators. If the Trump Organization has seen fit to fake this information to federal agencies, it is likely they have used falsified information in business dealings regarding these courses.

Background

From 2015 through 2016, Trump was required to file a yearly reporting of his finances with the Federal Elections Commission (FEC) that was reviewed by the Office of Government Ethics (OGE).¹ Since his inauguration in 2017, President Trump is required to file a materially similar document with the OGE (OGE form 278e).² Due to its three golf courses in Scotland and Ireland, the Trump Organization has registered multiple corporate entities in the respective jurisdictions for the purposes of running the golf courses and associated business ventures.

Both the United Kingdom and Ireland require businesses registered in their countries to file yearly statements of company finances.³ The U.K. and Irish filings are required to provide detailed information relating to the income, debt, and overall financial health of those companies. Trump has filed these forms under the following corporate entities:

- Aberdeen – Trump International Golf Club Scotland Limited
- Turnberry – Golf Recreation Scotland Limited
- Doonbeg – TIGL Ireland Enterprises Limited

His United Kingdom and Irish filings for the period covered by the form submitted to the OGE on July 31, 2020 are expected to be filed in October of this year. However, the form submitted on July 31, contains numbers similar to the falsified amounts from prior years.

On His US Filings, Donald Trump Misstated The Values Of His Courses In The U.K.

¹ Office Of Government Ethics, [Viewed 9/6/19](#)

² 5 U.S.C. § 101

³ Companies House [10/22/18](#); Companies Registration Office, [viewed 8/27/19](#)

On every one of his OGE 278 forms covering the period from 2014 through 2018, Trump has claimed that Trump Aberdeen and Trump Turnberry were individually worth “Over \$50,000,000”⁴ which is the maximum asset range required to be reported. However, Trump’s U.K. filings have consistently shown that Trump’s golf courses held a net liability each year.

2014

- On October 3, 2015, Trump Aberdeen filed its Full Accounts with Companies House showing its net liability in 2014 was -£8,620,152.⁵
- On October 7, 2015, Trump Turnberry filed its Group of Companies’ Accounts with Companies House showing its net liability was -£6,727,000 for 2014.⁶
- Combined, the total worth claimed to U.S. officials was over \$100 million while net liabilities claimed to Companies House was -£15,347,152.

2015

The Huffington Post reported that in filings for the year 2015, Donald Trump personally certified to U.S. officials that Aberdeen and Turnberry were worth more than \$100 million, but filings with Companies House made through December 31, 2015 had a value of negative \$32.1 million.⁷

- On October 4, 2016, Trump Aberdeen filed its Full Accounts with Companies House showing its net liability in 2014 was -£8,141,798.⁸
- On October 10, 2016, Trump Turnberry filed its Group of Companies’ Accounts with Companies House showing its net liability was -£13,682,000 for 2015.⁹
- Combined, the total worth claimed to U.S. officials was over \$100 million while net liabilities claimed to Companies House was -£21,823,798

2016

- In an October 6, 2017, filing with Companies House, Trump Aberdeen claimed its net liability was -£9,496,915 for 2016.¹⁰
- For the same reporting period, Trump Turnberry filed a Group of Companies Accounts with Companies House on October 6, 2017 showing its net liability was -£39,469,000.¹¹

⁴ Donald J. Trump – 2014 OGE form 278 Part 2, 7/15/15; Donald J. Trump – 2015 OGE form 278 Parts 2 and 6, 5/16/16; Donald J. Trump – 2016 OGE form 278 Parts 2 and 6, [6/14/17](#); Donald J. Trump – 2017 OGE form 278 Parts 2 and 6, [5/15/18](#); Donald J. Trump – 2018 OGE form 278 Parts 2 and 6, [5/15/19](#)

⁵ Companies House - Trump International Golf Club Scotland Limited – 2014 Full Accounts, [10/3/15](#)

⁶ Companies House - Golf Recreation Scotland Limited – 2014 Group of Companies’ Accounts, [10/7/15](#)

⁷ Huffington Post, [8/20/19](#)

⁸ Companies House - Trump International Golf Club Scotland Limited – 2015 Full Accounts, [10/4/16](#)

⁹ Companies House - Golf Recreation Scotland Limited – 2015 Group of Companies’ Accounts, [10/10/16](#)

¹⁰ Companies House - Trump International Golf Club Scotland Limited – 2016 Full Accounts, [10/6/17](#)

¹¹ Companies House – Golf Recreation Scotland Limited – 2016 Group of Companies’ Accounts, [10/6/17](#)

- Combined, the total worth conveyed to the U.S. officials was over \$100 million and net liabilities represented to Companies House was -£48,965,915.

2017

As reported by the Huffington Post, in 2018 filings for the year 2017, Donald Trump personally claimed Aberdeen and Turnberry were worth more than \$50 million each, but in filings before the U.K. government, balance sheets showed the combined debt of Aberdeen and Turnberry “exceeded their assets by 47.9 million British pounds – the equivalent of \$64.8 million.”¹²

- On October 5, 2018, Trump Aberdeen filed its Full Accounts with Companies House showing its net liability in 2017 was -£10,700,492.¹³
- On October 3, 2018, Trump Turnberry filed its Group of Companies’ Accounts with Companies House showing its net liability was -£37,231,000 for 2017.¹⁴
- Combined, the total worth claimed to U.S. officials was over \$100 million while net liabilities claimed to Companies House was -£47,931,492.

2018

- On October 4, 2019, Trump Aberdeen filed its Full Accounts with Companies House showing its net liability in 2018 was -£11,725,897.¹⁵
- On September 30, 2019, Trump Turnberry filed its Full Accounts with Companies House showing its net liability in 2018 was -£51,000,000 for 2018¹⁶
- Combined, the total worth claimed to U.S. officials was over \$100 million while net liabilities claimed to Companies House was -£62,725,897.

2019

- Full Accounts for Trump Aberdeen and Trump Turnberry for the year 2019 are due to Companies House in October 2020
- On July 31, 2019, the total worth claimed to U.S. officials was over \$100 million

On His US Filings, Trump Misstated His Income From His U.K. Courses

For each year that records are available, both Trump Aberdeen and Trump Turnberry have reported losses totaling into the millions of pounds to U.K. authorities. The two courses have claimed to the U.K.’s Companies House a total loss of £49,746,596 from 2014 through 2018, but, over the same time, Donald Trump

¹² Huffington Post, [8/20/19](#)

¹³ Companies House - Trump International Golf Club Scotland Limited – 2017 Full Accounts, [10/5/18](#)

¹⁴ Companies House - Golf Recreation Scotland Limited – 2017 Group of Companies’ Accounts, [10/3/18](#)

¹⁵ Companies House - Trump International Golf Club Scotland Limited – 2018 Full Accounts, [10/4/19](#)

¹⁶ Companies House - Golf Recreation Scotland Limited – 2018 Group of Companies’ Accounts, [9/30/19](#)

has represented to U.S. officials that he has personally received income totaling nearly \$120 million from the two courses.

As reported by the Huffington Post, in 2017 Donald Trump told U.S. officials with the Office of Government Ethics that he made a total of \$23.8 million between the Trump Aberdeen and Trump Turnberry golf courses, but he also submitted to Companies House documents claiming a £4.6 million, or \$6.3 million, in losses between the two courses.¹⁷ This same pattern of apparently deliberate misstatements has appeared in filings covering the period from 2014 through 2018.

- On October 3, 2015, Trump Aberdeen filed Full Accounts for 2014 in which Aberdeen reported a loss of £1,139,513¹⁸ Trump however had claimed to U.S. officials on July 15, 2015 that he received \$4,349,651 in income from Trump Aberdeen in the 2014 reporting period.¹⁹ Similarly, on October 7, 2015, Trump Turnberry submitted a Group of Companies' Accounts for 2014 in which Turnberry reported a loss of £3,603,000.²⁰ Donald Trump however represented to U.S. officials on July 15, 2015 that he had made \$20,395,000 in income from Trump Turnberry in the 2014 reporting period.²¹
- On October 4, 2016, Trump Aberdeen filed Full Accounts for 2015 in which Aberdeen claimed to have lost £1,096,108.²² Previously on May 16, 2016 Donald Trump told U.S. officials he received an income of \$4,880,743 from Trump Aberdeen in 2015.²³ On October 10, 2016 Trump Turnberry filed a Group of Companies' Accounts for 2015 with the Companies House in which Turnberry claims to have lost to have lost £8,396,000.²⁴ Once again, Donald Trump's personal filing on May 16, 2016 with U.S. officials claimed he received an income of \$18,186,951 from Trump Turnberry in 2015.²⁵
- On October 6, 2017, Trump Aberdeen filed Full Accounts for 2016. Trump Aberdeen claimed to have lost £1,405,308 in 2016.²⁶ However, on June 14, 2017 Donald Trump filed a financial disclosure with U.S. officials where he claimed to have received an income of \$3,803,033 from Trump Aberdeen in 2016.²⁷ On October 6, 2017 Trump Turnberry also filed its yearly report in a Group of Companies' Accounts for 2016 in which it claimed to have lost £17,620,000²⁸ Donald Trump filed a financial disclosure with U.S. officials on June 14, 2017 in which he claimed to have received an income of \$14,487,619 from Trump Turnberry in 2016.²⁹
- On October 5, 2018, Trump Aberdeen filed its Full Accounts for 2017 in which it claimed to have lost £1,255,836.³⁰ On May 15, 2018 Donald Trump filed a disclosure with U.S. officials where he claimed to have received an income of \$3,445,724 from Trump Aberdeen in 2017.³¹ Similarly, on October 3, 2018 Trump Turnberry filed a Group of Companies Accounts with the Companies House in which Trump

¹⁷ Huffington Post, [8/20/19](#)

¹⁸ UK Companies House - Trump International Golf Club Scotland Limited – 2014 Full Accounts, [10/3/15](#)

¹⁹ Office of Government Ethics, Donald Trump 2017 Annual Public Financial Disclosure Report, 7/15/15

²⁰ UK Companies House - Golf Recreation Scotland Limited, Group of Companies' Accounts, Year Ended December 2014 – Consolidated Profit and Loss Account, [10/7/15](#)

²¹ Office of Government Ethics, Donald Trump 2017 Annual Public Financial Disclosure Report, 7/15/15

²² UK Companies House - Trump International Golf Club Scotland Limited – 2015 Full Accounts, [10/4/16](#)

²³ Office of Government Ethics, Donald Trump 2015 Annual Public Financial Disclosure Report, 5/16/16

²⁴ UK Companies House - Golf Recreation Scotland Limited, Group of Companies' Accounts, Year Ended December 2015 – Consolidated Profit and Loss Account, [10/10/16](#)

²⁵ Office of Government Ethics, Donald Trump 2017 Annual Public Financial Disclosure Report, 5/16/16

²⁶ UK Companies House - Trump International Golf Club Scotland Limited – 2016 Full Accounts, [10/6/17](#)

²⁷ Office of Government Ethics, Donald Trump 2016 Annual Public Financial Disclosure Report, [6/14/17](#)

²⁸ UK Companies House - Golf Recreation Scotland Limited, Group of Companies' Accounts, Year Ended December 2016 – Consolidated Profit and Loss Account, [10/6/17](#)

²⁹ Office of Government Ethics, Donald Trump 2017 Annual Public Financial Disclosure Report, [6/14/17](#)

³⁰ UK Companies House - Trump International Golf Club Scotland Limited – 2017 Full Accounts, [10/5/18](#)

³¹ Office of Government Ethics, Donald Trump 2017 Annual Public Financial Disclosure Report, [5/15/18](#)

Turnberry claimed to have lost £3,383,000.³² In his May 15, 2018 filing with the OGE, Donald Trump disclosed an income of \$20,393,118 from Trump Turnberry in 2017.³³

- On October 4, 2019, Trump Aberdeen filed its Full Accounts for 2018 in which it claimed to have lost £1,072,831.³⁴ On May 15, 2019 Donald Trump filed a disclosure with U.S. officials stating that in 2018 he personally profited \$3,543,487 from Trump Aberdeen.³⁵ Similarly, on September 30, 2019 Trump Turnberry filed a Group of Companies Accounts for 2018 with Companies House in which Trump Turnberry claimed to have lost £10,775,000³⁶. In his May 15, 2019 filing with the OGE, Donald Trump disclosed an income of \$23,446,634 from Trump Turnberry in 2018³⁷
- On July 31, 2020, Donald Trump filed a disclosure with U.S. officials stating that in 2019 he personally profited \$4,321,067 from Trump Aberdeen and \$25,691,381 from Trump Turnberry.³⁸ Trump will file Full Accounts for 2019 with the Companies House in October 2020.

In His U.S. Filings, Trump Misstated His Income From His Irish Course

Since 2014, Donald Trump has owned the Trump Doonbeg Golf Course. From 2014 to 2018 the period for which Irish corporate documents are available, Trump Doonbeg has reported a loss each year, totaling €10.4 million. However, Donald Trump has personally represented to United States officials that during the same time period that Doonbeg generated an income in excess of \$10.5 million each year, totaling \$62.7 million.

- On August 25, 2015, TIGL Ireland Enterprises Limited filed an Abridged Financial Statement for 2014 with the Companies Registration office that claimed it lost -€2,549,801.³⁹ On July 15, 2015, Donald Trump represented to U.S. officials that for 2014 he received an income of \$10,755,683 from his Doonbeg golf course.⁴⁰
- On October 28, 2016, TIGL Ireland Enterprises Limited filed an Abridged Financial Statement for 2015 with the Companies Registration office that claimed it lost -€2,578,838.⁴¹ On May 16, 2016, Donald Trump represented to U.S. officials with the Office of Government Ethics that for 2015 Trump received \$10,750,645 in income from his Doonbeg golf course.⁴²
- On October 17, 2018, TIGL Ireland Enterprises Limited filed a Director's Report and Consolidated Financial Statements for 2017, with the Companies Registration office. The filing included an update for the 2016 financial year that updated the loss claimed to -€2,011,240.⁴³ On June 14, 2017, Donald Trump

³² UK Companies House - Golf Recreation Scotland Limited, Group of Companies' Accounts, Year Ended December 2017 – Consolidated Profit and Loss Account, [10/3/18](#)

³³ Office of Government Ethics, Donald Trump 2018 Annual Public Financial Disclosure Report, [5/15/18](#)

³⁴ UK Companies House - Trump International Golf Club Scotland Limited – 2018 Full Accounts, [10/4/19](#)

³⁵ Office of Government Ethics, Donald Trump 2018 Annual Public Financial Disclosure Report, [5/15/19](#)

³⁶ Golf Recreation Scotland Limited Annual Report and Financial Statements, Group of Companies' Accounts, Year Ended December 2017, [9/30/19](#)

³⁷ Office of Government Ethics, Donald Trump 2018 Annual Public Financial Disclosure Report, [5/15/19](#)

³⁸ Office of Government Ethics, Donald Trump 2019 Annual Public Financial Disclosure Report, [7/31/19](#)

³⁹ Ireland Companies Registration Office – TIGL Ireland Enterprises Limited – 2014 Abridged Financial Statements - Sub Num 10049729, [8/25/15](#)

⁴⁰ U.S. Office of Government Ethics, Donald Trump 2014 Annual Public Financial Disclosure Report, 7/15/15

⁴¹ Ireland Companies Registration Office – TIGL Ireland Enterprises – 2015 Abridged Financial Statements - Sub Num 11382965, [10/28/16](#)

⁴² U.S. Office of Government Ethics, Donald Trump 2015 Annual Public Financial Disclosure Report, 5/16/16

⁴³ Ireland Companies Registration Office – TIGL Ireland Enterprises Limited – 2017 Directors Report – Sub Num 13077148, [10/17/18](#)

represented to U.S. officials with the Office of Government Ethics that for 2016 he received an income of \$12,498,172 from Trump Doonbeg.⁴⁴

- On October 17, 2018, TIGL Ireland Enterprises Limited filed a Director's Report and Consolidated Financial Statements for 2017 with the Companies Registration office that claimed it lost -€1,773,817.⁴⁵ On May 15, 2018, Donald Trump claimed to U.S. officials with the Office of Government Ethics that he received an income of \$14,184,974 from Trump Doonbeg in 2017.⁴⁶
- On October 31, 2019, TIGL Ireland Enterprises Limited filed a Director's Report and Consolidated Financial Statements for 2018 with the Companies Registration office that claimed it lost -€1,499,053.⁴⁷ On May 15, 2019, Donald Trump claimed to U.S. officials with the Office of Government Ethics that he received an income of \$14,498,625 from Trump Doonbeg in 2018.⁴⁸
- On July 31, 2020, Donald Trump claimed to U.S. officials with the Office of Government Ethics that he received an income of \$13,474,131 from Trump Doonbeg in 2018.⁴⁹ TIGL Ireland Enterprises Limited will file a Director's Report and Consolidated Financial Statements for 2019 with the Companies Registration office in October 2020.

Donald Trump Failed To Report Loans To Aberdeen And Turnberry On Financial Disclosures

As reported in the Huffington Post in October of last year, Donald Trump has failed to report \$199.5 million in loans that he has made to Trump Aberdeen and Trump Turnberry. Donald Trump personally guaranteed loans to his Aberdeen golf course for \$54.9 million and he has made loans totaling \$144.6 million through his trust to his Trump Turnberry golf course.⁵⁰ In the time since the publication of this story, loans to Aberdeen have increased by £1,185,650 while loans to Turnberry have increased by £7,774,000.

By 2013, the first year in which United Kingdom corporate records revealing transactions with related parties are available, Donald Trump had already lent £37,064,970 to Aberdeen.⁵¹ From 2014 through 2018, Donald Trump personally lent additional amounts to Trump Aberdeen, but never reported the initial or subsequent loans to the FEC or OGE.

- On October 3, 2015, Trump Aberdeen disclosed to the U.K. Companies House a personal loan from "Mr D J Trump, director" for £38,313,850 for 2014.⁵²
- On October 4, 2016, Trump Aberdeen disclosed to the U.K. Companies House a personal loan of £39,361,535 "from a director" for 2015.⁵³

⁴⁴ U.S. Office of Government Ethics, Donald Trump 2016 Annual Public Financial Disclosure Report, [6/14/17](#)

⁴⁵ Ireland Companies Registration Office – TIGL Ireland Enterprises Limited – 2017 Directors Report – Sub Num 13077148, [10/17/18](#)

⁴⁶ Office of Government Ethics, Donald Trump 2017 Annual Public Financial Disclosure Report, [5/15/18](#)

⁴⁷ Ireland Companies Registration Office – TIGL Ireland Enterprises Limited – 2018 Directors Report – Sub Num 13077148, [10/31/19](#)

⁴⁸ Office of Government Ethics, Donald Trump 2018 Annual Public Financial Disclosure Report, [5/15/19](#)

⁴⁹ Office of Government Ethics, Donald Trump 2019 Annual Public Financial Disclosure Report, [7/31/20](#)

⁵⁰ Huffington Post, [8/20/19](#)

⁵¹ Companies House – Trump International Golf Club Scotland Limited – 2013 Full Accounts - Notes to the Financial Statements – 17 Related Parties, [10/7/14](#)

⁵² Companies House – Trump International Golf Club Scotland Limited – 2014 Full Accounts - Notes to the Financial Statements – 17 Related Parties, [10/3/15](#)

⁵³ Companies House – Trump International Golf Club Scotland Limited – 2015 Full Accounts - Notes to the Financial Statements – 18 Related Parties, [10/4/16](#)

- On October 6, 2017, Trump Aberdeen disclosed to the U.K. Companies House a personal loan of £40,616,321 “from Mr D J Trump” for 2016. In the same filing, “Mr D J Trump” was listed as having been a director during 2016 “and up until 19 January 2017.”⁵⁴
- On October 5, 2018, Trump Aberdeen disclosed to the U.K. Companies House that through 2017, “Mr D J Trump” had personally loaned a total of £40,616,321 to Trump Aberdeen and that “DJT Holdings LLC” had loaned an additional £1,306,470 to Aberdeen in 2017.⁵⁵
- On October 4, 2019, Trump Aberdeen disclosed to the U.K. Companies House that through 2017, “Mr D J Trump” had personally loaned a total of £40,616,321 to Trump Aberdeen and that “DJT Holdings LLC” had loaned an additional £2,492,120 to Aberdeen in 2018.⁵⁶

Since 2014, Donald Trump has similarly reported £114,926,000 million in loans from his company and trust to Trump Turnberry in documents filed with U.K. Companies House. He has never reported the loans to the FEC or OGE.

- On October 7, 2015, Trump Turnberry disclosed to the U.K. Companies House a “creditor amount due to parent” for £42,015,000 for 2014.⁵⁷
- On October 10, 2016, Trump Turnberry disclosed to the U.K. Companies House “amounts owed to related parties” of £63,169,000 owed to its parent for 2015.⁵⁸
- On October 6, 2017, Trump Turnberry disclosed to the U.K. Companies House “amounts owed to related parties” of £111,961,000 owed to its parent for 2016.⁵⁹
- On October 3, 2018, Trump Turnberry disclosed to the U.K. Companies House “amounts owed to related parties” of £107,152,000 owed to its parent for 2017.⁶⁰
- On September 30, 2019, Trump Turnberry disclosed to the U.K. Companies House “amounts owed to related parties” of £114,926,000 owed to its parent for 2018.⁶¹

Donald Trump has never reported on his Personal Financial Disclosures the personal loans he has made to Trump Aberdeen or Turnberry

- On July 15, 2015, Donald Trump signed an OGE form 278e for 2014 that contains no mention of his existing and additional loans to Aberdeen or Turnberry.⁶²

⁵⁴ Companies House – Trump International Golf Club Scotland Limited – 2016 Full Accounts - Notes to the Financial Statements – 18 Related Parties, [10/6/17](#)

⁵⁵ Companies House - Trump International Golf Club Scotland Limited – 2017 Full Accounts - Notes to the Financial Statements – 20 Related Parties, [10/5/18](#)

⁵⁶ Companies House - Trump International Golf Club Scotland Limited – 2018 Full Accounts - Notes to the Financial Statements – 20 Related Parties, [10/4/19](#)

⁵⁷ Companies House – Golf Recreation Scotland Limited – Group of companies' accounts - Notes to the Financial Statements – 17 Related Party relationships and transactions, [10/7/15](#)

⁵⁸ Companies House – Golf Recreation Scotland Limited – Group of companies' accounts - Notes to the Financial Statements – 21 Related party transactions, [10/10/16](#)

⁵⁹ Companies House – Golf Recreation Scotland Limited – Group of companies' accounts - Notes to the Financial Statements – 21 Related party transactions, [10/6/17](#)

⁶⁰ Companies House – Golf Recreation Scotland Limited – Group of companies' accounts - Notes to the Financial Statements – 22 Related party transactions, [10/3/18](#)

⁶¹ Companies House – Golf Recreation Scotland Limited – Group of companies' accounts - Notes to the Financial Statements – 24 Related party transactions, [10/7/19](#)

⁶² Donald J. Trump – 2014 OGE form 278 Parts 2 and 6, 7/15/15

- On May 16, 2016, Donald Trump signed an OGE form 278e for 2015 that contains no mention of any loans to Aberdeen or Turnberry.⁶³
- On June 14, 2017, Donald Trump signed an OGE form 278e for 2016 that contains no mention of any loans to Aberdeen or Turnberry.⁶⁴
- On May 15, 2018, Donald Trump signed an OGE form 278e for 2017 that contains no mention of any loans to Aberdeen or Turnberry.⁶⁵
- On May 15, 2019, Donald Trump signed an OGE form 278e for 2018 that contains no mention of any loans to Aberdeen or Turnberry.⁶⁶
- On July 31, 2020, Donald Trump signed an OGE form 278e for 2019 that contains no mention of any loans to Aberdeen or Turnberry.⁶⁷

Potential Applicability to Manhattan District Attorney Investigation

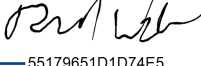
Court filings and press reports have indicated that the Manhattan District Attorney's office is investigating a pattern of the Trump Organization repeatedly providing falsified financial information to banks and insurance agencies.

In the motion to dismiss filed on August 30th, the District Attorney's office mentions "public reporting demonstrates that the Office had a valid basis for requesting each category and timeframe of document listed in the Mazars Subpoena." The aforementioned Huffington Post article is another example in the public record of a potential falsification by the Trump Organization in order to make the company's finances appear more robust.

Additionally, the documents filed in the UK and Ireland provide a small window into the larger Trump Organization's finances – and give additional examples of falsification. Combined with the falsified numbers submitted to OGE, this is another proof point that the only way for the grand jury to receive accurate information on Trump's financials is through tax returns.

In order to aid the district Attorney's investigation, we are providing your office with the publicly available documents from the Federal Government, Ireland, and the United Kingdom that show these additional examples of Trump Organization asset inflation. We hope that you find them useful in your investigation.

Sincerely,

DocuSigned by:


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Brad Woodhouse

American Democracy Legal Fund
455 Massachusetts Avenue NW, Suite 650
Washington, DC 20001

⁶³ Donald J. Trump – 2015 OGE form 278 Parts 2 and 6, 5/16/16

⁶⁴ Donald J. Trump – 2016 OGE form 278 Parts 2 and 6, [6/14/17](#)

⁶⁵ Donald J. Trump – 2017 OGE form 278 Parts 2 and 6, [5/15/18](#)

⁶⁶ Donald J. Trump – 2018 OGE form 278 Parts 2 and 6, [5/15/19](#)

⁶⁷ Donald J. Trump – 2019 OGE form 278 Parts 2 and 6, [7/31/20](#)