

August 10, 2020

Director Christopher Wray
Federal Bureau Of Investigation
935 Pennsylvania Avenue, NW
Washington, D.C. 20535-0001

Re: Request for Investigation of Donald Trump's Annual Financial Disclosures

Dear Director Wray,

The American Democracy Legal Fund respectfully requests the Federal Bureau of Investigation open an investigation into apparent inconsistencies, misstatements, and lies in President Trump's annual financial disclosure filings regarding loans to, and the profit margins of, his golf courses in the U.K. and Ireland. The FBI is the correct venue in which to investigate these discrepancies, as the normal process of appealing to a respective agency inspector general is impossible when the filer is the President of the United States.

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 has been 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. As such, the agency should include the most recent form in any investigation.

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

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](#)

through his trust to his Trump Turnberry golf course.⁴ 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.⁵ 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 2014.⁶
- On October 4, 2016, Trump Aberdeen disclosed to the U.K. Companies House a personal loan of £39,361,535 “from a director” for 2015.⁷
- 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.”⁸
- 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 2017.⁹
- 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 2018.¹⁰

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 2014.¹¹
- 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 2015.¹²

⁴ Huffington Post, [8/20/19](#)

⁵ Companies House – Trump International Golf Club Scotland Limited – 2013 Full Accounts - Notes to the Financial Statements – 17 Related Parties, [10/7/14](#)

⁶ Companies House – Trump International Golf Club Scotland Limited – 2014 Full Accounts - Notes to the Financial Statements – 17 Related Parties, [10/3/15](#)

⁷ Companies House – Trump International Golf Club Scotland Limited – 2015 Full Accounts - Notes to the Financial Statements – 18 Related Parties, [10/4/16](#)

⁸ Companies House – Trump International Golf Club Scotland Limited – 2016 Full Accounts - Notes to the Financial Statements – 18 Related Parties, [10/6/17](#)

⁹ Companies House - Trump International Golf Club Scotland Limited – 2017 Full Accounts - Notes to the Financial Statements – 20 Related Parties, [10/5/18](#)

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

¹¹ Companies House – Golf Recreation Scotland Limited – Group of companies' accounts - Notes to the Financial Statements – 17 Related Party relationships and transactions, [10/7/15](#)

¹² Companies House – Golf Recreation Scotland Limited – Group of companies' accounts - Notes to the Financial Statements – 21 Related party transactions, [10/10/16](#)

- 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 2016.¹³
- 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 2017.¹⁴
- 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 2018.¹⁵

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.¹⁶
- On May 16, 2016, Donald Trump signed an OGE form 278e for 2015 that contains no mention of any loans to Aberdeen or Turnberry.¹⁷
- On June 14, 2017, Donald Trump signed an OGE form 278e for 2016 that contains no mention of any loans to Aberdeen or Turnberry.¹⁸
- On May 15, 2018, Donald Trump signed an OGE form 278e for 2017 that contains no mention of any loans to Aberdeen or Turnberry.¹⁹
- On May 15, 2019, Donald Trump signed an OGE form 278e for 2018 that contains no mention of any loans to Aberdeen or Turnberry.²⁰
- On July 31, 2020, Donald Trump signed an OGE form 278e for 2019 that contains no mention of any loans to Aberdeen or Turnberry.²¹

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

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”²² which is the maximum asset range required to be reported. However, Trump’s U.K. filings have consistently shown that Trump’s golf courses had a net liability each year.

¹³ Companies House – Golf Recreation Scotland Limited – Group of companies' accounts - Notes to the Financial Statements – 21 Related party transactions, [10/6/17](#)

¹⁴ Companies House – Golf Recreation Scotland Limited – Group of companies' accounts - Notes to the Financial Statements – 22 Related party transactions, [10/3/18](#)

¹⁵ Companies House – Golf Recreation Scotland Limited – Group of companies' accounts - Notes to the Financial Statements – 24 Related party transactions, [10/7/19](#)

¹⁶ Donald J. Trump – 2014 OGE form 278 Parts 2 and 6, 7/15/15

¹⁷ Donald J. Trump – 2015 OGE form 278 Parts 2 and 6, 5/16/16

¹⁸ Donald J. Trump – 2016 OGE form 278 Parts 2 and 6, [6/14/17](#)

¹⁹ Donald J. Trump – 2017 OGE form 278 Parts 2 and 6, [5/15/18](#)

²⁰ Donald J. Trump – 2018 OGE form 278 Parts 2 and 6, [5/15/19](#)

²¹ Donald J. Trump – 2019 OGE form 278 Parts 2 and 6, [7/31/20](#)

²² 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](#)

2014

- On October 3, 2015, Trump Aberdeen filed its Full Accounts with Companies House showing its net liability in 2014 was -£8,620,152.²³
- On October 7, 2015, Trump Turnberry filed its Group of Companies' Accounts with Companies House showing its net liability was -£6,727,000 for 2014.²⁴
- 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.²⁵

- On October 4, 2016, Trump Aberdeen filed its Full Accounts with Companies House showing its net liability in 2014 was -£8,141,798.²⁶
- On October 10, 2016, Trump Turnberry filed its Group of Companies' Accounts with Companies House showing its net liability was -£13,682,000 for 2015.²⁷
- 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 2016.²⁸
- 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 -£39,469,000.²⁹
- 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

²³Companies House - Trump International Golf Club Scotland Limited – 2014 Full Accounts, [10/3/15](#)

²⁴ Companies House - Golf Recreation Scotland Limited – 2014 Group of Companies' Accounts, [10/7/15](#)

²⁵Huffington Post, [8/20/19](#)

²⁶Companies House - Trump International Golf Club Scotland Limited – 2015 Full Accounts, [10/4/16](#)

²⁷ Companies House - Golf Recreation Scotland Limited – 2015 Group of Companies' Accounts, [10/10/16](#)

²⁸ Companies House - Trump International Golf Club Scotland Limited – 2016 Full Accounts, [10/6/17](#)

²⁹ Companies House – Golf Recreation Scotland Limited – 2016 Group of Companies' Accounts, [10/6/17](#)

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.”³⁰

- On October 5, 2018, Trump Aberdeen filed its Full Accounts with Companies House showing its net liability in 2017 was -£10,700,492.³¹
- On October 3, 2018, Trump Turnberry filed its Group of Companies’ Accounts with Companies House showing its net liability was -£37,231,000 for 2017.³²
- 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 -£11,725,897.³³
- On September 30, 2019, Trump Turnberry filed its Full Accounts with Companies House showing its net liability in 2018 was -£51,000,000 for 2018³⁴
- 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 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,

³⁰ Huffington Post, [8/20/19](#)

³¹ Companies House - Trump International Golf Club Scotland Limited – 2017 Full Accounts, [10/5/18](#)

³² Companies House - Golf Recreation Scotland Limited – 2017 Group of Companies’ Accounts, [10/3/18](#)

³³ Companies House - Trump International Golf Club Scotland Limited – 2018 Full Accounts, [10/4/19](#)

³⁴ Companies House - Golf Recreation Scotland Limited – 2018 Group of Companies’ Accounts, [9/30/19](#)

loss between the two courses.³⁵ 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 £1,139,513³⁶ 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.³⁷ Similarly, on October 7, 2015, Trump Turnberry submitted a Group of Companies' Accounts for 2014 in which Turnberry reported a loss of £3,603,000.³⁸ 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.³⁹
- On October 4, 2016, Trump Aberdeen filed Full Accounts for 2015 in which Aberdeen claimed to have lost £1,096,108.⁴⁰ Previously on May 16, 2016 Donald Trump told U.S. officials he received an income of \$4,880,743 from Trump Aberdeen in 2015.⁴¹ 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 £8,396,000.⁴² 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 2015.⁴³
- On October 6, 2017, Trump Aberdeen filed Full Accounts for 2016. Trump Aberdeen claimed to have lost £1,405,308 in 2016.⁴⁴ 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 2016.⁴⁵ 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 £17,620,000⁴⁶ 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 2016.⁴⁷
- On October 5, 2018, Trump Aberdeen filed its Full Accounts for 2017 in which it claimed to have lost £1,255,836.⁴⁸ 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 2017.⁴⁹ Similarly, on October 3, 2018 Trump Turnberry filed a Group of Companies Accounts with the Companies House in which Trump Turnberry claimed to have lost £3,383,000.⁵⁰ In his May 15, 2018 filing with the OGE Donald Trump disclosed an income of \$20,393,118 from Trump Turnberry in 2017.⁵¹

³⁵ Huffington Post, [8/20/19](#)

³⁶ UK Companies House - Trump International Golf Club Scotland Limited – 2014 Full Accounts, [10/3/15](#)

³⁷ Office of Government Ethics, Donald Trump 2017 Annual Public Financial Disclosure Report, 7/15/15

³⁸ UK Companies House - Golf Recreation Scotland Limited, Group of Companies' Accounts, Year Ended December 2014 – Consolidated Profit and Loss Account, [10/7/15](#)

³⁹ Office of Government Ethics, Donald Trump 2017 Annual Public Financial Disclosure Report, 7/15/15

⁴⁰ UK Companies House - Trump International Golf Club Scotland Limited – 2015 Full Accounts, [10/4/16](#)

⁴¹ Office of Government Ethics, Donald Trump 2015 Annual Public Financial Disclosure Report, 5/16/16

⁴² UK Companies House - Golf Recreation Scotland Limited, Group of Companies' Accounts, Year Ended December 2015 – Consolidated Profit and Loss Account, [10/10/16](#)

⁴³ Office of Government Ethics, Donald Trump 2017 Annual Public Financial Disclosure Report, 5/16/16

⁴⁴ UK Companies House - Trump International Golf Club Scotland Limited – 2016 Full Accounts, [10/6/17](#)

⁴⁵ Office of Government Ethics, Donald Trump 2016 Annual Public Financial Disclosure Report, [6/14/17](#)

⁴⁶ UK Companies House - Golf Recreation Scotland Limited, Group of Companies' Accounts, Year Ended December 2016 – Consolidated Profit and Loss Account, [10/6/17](#)

⁴⁷ Office of Government Ethics, Donald Trump 2017 Annual Public Financial Disclosure Report, [6/14/17](#)

⁴⁸ UK Companies House - Trump International Golf Club Scotland Limited – 2017 Full Accounts, [10/5/18](#)

⁴⁹ Office of Government Ethics, Donald Trump 2017 Annual Public Financial Disclosure Report, [5/15/18](#)

⁵⁰ UK Companies House - Golf Recreation Scotland Limited, Group of Companies' Accounts, Year Ended December 2017 – Consolidated Profit and Loss Account, [10/3/18](#)

⁵¹ Office of Government Ethics, Donald Trump 2018 Annual Public Financial Disclosure Report, [5/15/18](#)

- On October 4, 2019, Trump Aberdeen filed its Full Accounts for 2018 in which it claimed to have lost £1,072,831.⁵² 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.⁵³ 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 £10,775,000⁵⁴. In his May 15, 2019 filing with the OGE Donald Trump disclosed an income of \$23,446,634 from Trump Turnberry in 2018⁵⁵
- 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.⁵⁶ Trump will file Full Accounts for 2019 with the Companies House in October 2020.

On His US 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 €2,549,801.⁵⁷ 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.⁵⁸
- On October 28, 2016, TIGL Ireland Enterprises Limited filed an Abridged Financial Statement for 2015 with the Companies Registration office that claimed it lost -€2,578,838.⁵⁹ 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.⁶⁰
- 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 -€2,011,240.⁶¹ On June 14, 2017, Donald Trump 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.⁶²

⁵² UK Companies House - Trump International Golf Club Scotland Limited – 2018 Full Accounts, [10/4/19](#)

⁵³ Office of Government Ethics, Donald Trump 2018 Annual Public Financial Disclosure Report, [5/15/19](#)

⁵⁴ Golf Recreation Scotland Limited Annual Report and Financial Statements, Group of Companies' Accounts, Year Ended December 2017, [9/30/19](#)

⁵⁵ Office of Government Ethics, Donald Trump 2018 Annual Public Financial Disclosure Report, [5/15/19](#)

⁵⁶ Office of Government Ethics, Donald Trump 2019 Annual Public Financial Disclosure Report, [7/31/19](#)

⁵⁷ Ireland Companies Registration Office – TIGL Ireland Enterprises Limited – 2014 Abridged Financial Statements - Sub Num 10049729, [8/25/15](#)

⁵⁸ U.S. Office of Government Ethics, Donald Trump 2014 Annual Public Financial Disclosure Report, 7/15/15

⁵⁹ Ireland Companies Registration Office – TIGL Ireland Enterprises – 2015 Abridged Financial Statements - Sub Num 11382965, [10/28/16](#)

⁶⁰ U.S. Office of Government Ethics, Donald Trump 2015 Annual Public Financial Disclosure Report, 5/16/16

⁶¹ Ireland Companies Registration Office – TIGL Ireland Enterprises Limited – 2017 Directors Report – Sub Num 13077148, [10/17/18](#)

⁶² U.S. Office of Government Ethics, Donald Trump 2016 Annual Public Financial Disclosure Report, [6/14/17](#)

- 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 -€1,773,817.⁶³ 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 2017.⁶⁴
- 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 -€1,499,053.⁶⁵ 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 2018.⁶⁶
- 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 2018.⁶⁷ TIGL Ireland Enterprises Limited will file a Director’s Report and Consolidated Financial Statements for 2019 with the Companies Registration office in October 2020.

Legal Violations

Failure To Report Loans On Personal Financial Disclosures

As the previously stated background evidence shows, Donald Trump has never reported on his personal financial disclosure forms, filed with either the FEC or OGE, the loans he personally made to Trump Aberdeen or the loans made from the Trump Organization to Trump Turnberry.

Guidance from the Office of Government Ethics makes it clear that Trump was required to report the loans to Aberdeen and Turnberry. According to the Office of Government Ethics, “The applicable statute excludes certain loans to family members from the reporting requirement. You do not need to report personal loans made by you, your spouse, or a dependent child to a parent, spouse, sibling, or child. **Report a loan made to another party if the value of the loan was more than \$1,000 at the end of the reporting period or if more than \$200 in income was received during the reporting period. The other party may be either a person or an entity.**”⁶⁸ Trump’s own financial disclosures make it clear: he understood he has to report loans owed between his companies, as his disclosure lists a loan due to Chicago Unit Acquisition LLC, a company he controls.⁶⁹

5 USC §104 states that anyone who fails to report required information shall be fined under 18 USC. According to 5 USC §104.

Failure to file or filing false reports, “(a)(1) The Attorney General may bring a civil action in any appropriate United States district court against any individual who knowingly and willfully falsifies or who knowingly and willfully fails to file or report any information that such individual is required to report pursuant to section 102. The court in which such action is brought may assess against such individual a civil penalty in any amount, not to exceed \$50,000. **(2)(A) It shall be unlawful for any person to knowingly and willfully-** (i) falsify any information that

⁶³ Ireland Companies Registration Office – TIGL Ireland Enterprises Limited – 2017 Directors Report – Sub Num 13077148, [10/17/18](#)

⁶⁴ Office of Government Ethics, Donald Trump 2017 Annual Public Financial Disclosure Report, [5/15/18](#)

⁶⁵ Ireland Companies Registration Office – TIGL Ireland Enterprises Limited – 2018 Directors Report – Sub Num 13077148, [10/31/19](#)

⁶⁶ Office of Government Ethics, Donald Trump 2018 Annual Public Financial Disclosure Report, [5/15/19](#)

⁶⁷ Office of Government Ethics, Donald Trump 2019 Annual Public Financial Disclosure Report, [7/31/20](#)

⁶⁸ OGE, viewed [9/4/19](#)

⁶⁹ Donald J. Trump – 2019 OGE form 278 Part 7, [7/31/20](#); Washington Post [10/8/18](#)

such person is required to report under section 102; and **(ii) fail to file or report any information that such person is required to report under section 102.** (B) Any person who- (i) violates subparagraph (A)(i) shall be fined under title 18, United States Code, imprisoned for not more than 1 year, or both; **and (ii) violates subparagraph (A)(ii) shall be fined under title 18, United States Code.**⁷⁰

18 USC §1001 states that if an official knowingly and willfully falsifies a material fact, or makes a materially false statement or representation or makes or uses any false writing or document knowing the document is false or contains any materially false, fictitious or fraudulent statement shall be fined and-or imprisoned up to five years. According to 18 USC §1001,

Statements or entries generally (a) **Except as otherwise provided in this section, whoever, in any matter within the jurisdiction of the executive, legislative, or judicial branch of the Government of the United States, knowingly and willfully-** (1) falsifies, conceals, or covers up by any trick, scheme, or device a material fact; (2) makes any materially false, fictitious, or fraudulent statement or representation; or (3) makes or uses any false writing or document knowing the same to contain any materially false, fictitious, or fraudulent statement or entry; shall be fined under this title, imprisoned not more than 5 years or, if the offense involves international or domestic terrorism (as defined in section 2331), imprisoned not more than 8 years, or both. If the matter relates to an offense under chapter 109A, 109B, 110, or 117, or section 1591, then the term of imprisonment imposed under this section shall be not more than 8 years.⁷¹

In each of Donald Trump's filings covering 2014, 2015, 2016, 2017, and 2018, he submitted a filing without reporting his loans to Trump Aberdeen or Turnberry. Donald Trump's continual failure to report the loan, when he does report it to UK officials raises suspicions that he "knowingly and willfully" violated the law. Donald Trump in violation of OGE regulations and the requirements under 5 USC §102(a)(3) and 5 USC §104 (a)(2)(A)(ii). And as such Donald Trump may personally be subject to penalties under 5 USC §104 (a)(2)(B)(ii) and 18 USC §1001.

Failure To Report True And Correct Information On Personal Financial Disclosure Forms

The clearly contradictory valuations and profits of Donald Trump's golf clubs in the U.K. and Ireland appear to pose potential civil and criminal violations. As Virginia Cantor, an ethics law expert at Citizens for Responsibility and Ethics in Washington said, "The numbers don't appear to add up" and added "That said, it's not at all clear after reviewing the U.K. balance sheet for Aberdeen how they came to \$50 million. ... I think it raises legitimate questions."⁷²

Section 104 of the Ethics in Government Act of 1978 states that anyone who knowingly and willfully falsifies any information required to be reported shall face up to a year in prison and a fine under 18 USC. According to 5 USC §104 (2)(A) **"It shall be unlawful for any person to knowingly and willfully- (i) falsify any information that such person is required to report under section 102."**⁷³

Similarly, the failure to report loans and Donald Trump's apparent knowing failure to report an accurate valuation and income for his courses potentially opens him to prosecution under 18 USC §1001.

⁷⁰ 5 USC, §104 - Ethics in Government Act, Accessed [9/4/19](#)

⁷¹ 18 USC §1001, Accessed [9/4/19](#)

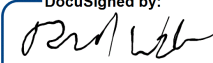
⁷² Huffington Post, [8/20/19](#)

⁷³ 5 USC, §104 - Ethics in Government Act, Accessed [9/4/19](#)

Donald Trump has repeatedly reported information in his personal financial disclosure that has been directly contradicted in U.K. and Irish filings. Donald Trump's personal financial disclosure filings for 2014, 2015, 2016, and 2017 each contain contradictory information which would appear to violate 5 USC §104 (a)(2)(A)(i), and as such, could be subject to penalties under 5 USC §104 (a)(2)(B)(i) and 18 USC §1001.

The laws are clear on what is and what is not reportable on a personal financial disclosure OGE Form 278e. Donald Trump has hidden personal loans to Trump Aberdeen and Turnberry, and reported falsified numbers regarding the income and value of his golf courses. This flagrant and years-long flouting of reporting requirements and U.S. law deserves further scrutiny. We urge you to investigate these matters immediately.

Sincerely,

DocuSigned by:

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Brad Woodhouse

American Democracy Legal Fund

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