

**BEFORE THE FEDERAL ELECTION COMMISSION**

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MARGARET CHRIST  
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v. MUR No. \_\_\_\_\_

LI JUAN "CINDY" YANG  
3189 Hamblin Way  
Wellington, FL 33414

XINYUE "DANIEL" LOU  
192 Petrus Avenue  
Staten Island, NY 10312

SUN CHANGCHUN  
address unknown

JINGZHU "MARGARET" YANG  
c/o AmeriChina  
1345 Ave of the Americas  
Rm.2-113  
New York, NY 10105

JIUSI YAO  
c/o BUDS  
address unknown

MA JIN  
c/o HGGT Limited  
address unknown

LI JING  
63 Wall St  
New York, NY 10005

RECEIVED  
FEDERAL MAIL CENTER  
2019 MAY 22 PM 5:09

JON DENG  
20142 Ocean Key Drive  
Boca Raton, FL 33498

HUI LIU  
20142 Ocean Key Drive  
Boca Raton, FL 33498

RYAN XU  
c/o Blockchain Global  
Level 21 HWT Tower  
40 City Road  
Southbank, Melbourne 3006

LI XIAOHUA  
c/o Huada Group International Co  
22/f Po Shau Ctr  
115 How Ming St  
Kwun Tong, Hong Kong

JOHN DOE, JANE DOE, and other  
persons who made contributions

JOHN DOE, JANE DOE, and other  
persons who knowingly provided  
substantial assistance in the making  
of foreign national contributions,  
and/or allowed their names to be  
used to make contributions

## **COMPLAINT**

1. This complaint is filed pursuant to 52 U.S.C. § 30109(a)(1) and is based on information and belief that Li Juan “Cindy” Yang, Xinyue “Daniel” Lou, Sun Changchun, Jingzhu “Margaret” Yang, Jiusi Yao, Ma Jin, and other unknown person(s) who knowingly provided substantial assistance in the making of foreign national contributions (John Doe, Jane Doe, and other persons), U.S. nationals who allowed their names to be used to facilitate such contributions or other straw

contributions, including Li Jing, Jon Deng, Hui Liu, and/or other unknown persons (John Doe, Jane Doe, and other persons), and foreign national contributors, including Li Xiaohua and Ryan Xu, have violated Sections 30121 and 30222 of the Federal Election Campaign Act (“FECA”), 52 U.S.C. § 30101, *et seq.*

2. Specifically, there is reason to believe that dozens of foreign nationals have made contributions to federal and local political committees, in violation of 52 U.S.C. § 30121, and have done so in the names of other persons, in violation of the straw donor ban at 52 U.S.C. § 30122. For over two years, Chinese nationals residing in China have been invited to U.S. fundraisers for committees including the Trump Victory Fund, a joint fundraising committee between Donald J. Trump for President, Inc., and the Republican National Committee (“RNC”), often at a six-figure cost. The invitations, some of which are topped with the insignia of the Trump Victory Fund, offer attendees an opportunity to attend fundraisers where admission is generally contingent on making a contribution and/or offer attendees an opportunity to take a picture with the President of the United States, a privilege only afforded to contributors who give or raise substantial amounts. Published reports and photographs posted on social media indicate that multiple Chinese nationals who participated in these excursions have gained admission to U.S. fundraisers, and some have appeared in photographs with the President. Although RNC officials and excursion organizers have described Chinese nationals participating in these events as “guests” of U.S. nationals who contributed the necessary sums, it is not plausible that dozens of wealthy U.S. nationals are routinely making contributions of up to \$50,000 using their own funds, and then passing the perks associated with that contribution to

a Chinese tourist who paid a travel firm many times that amount. Instead, it is far more likely that U.S. nationals are being reimbursed for their contributions using some portion of the funds paid by Chinese nationals participating in these political tourism packages. As a result, there is reason to believe (1) that organizers of these fundraising events violated FECA's prohibition on knowingly providing substantial assistance in the solicitation, making, acceptance, or receipt of a foreign national's contribution, 11 C.F.R. § 110.20(h)(1), (2) that U.S. nationals who allowed their name to be used to facilitate such contributions violated the straw donor ban, 52 U.S.C. § 30122, and (3) that the foreign national contributors violated the ban on foreign nationals making contributions, 52 U.S.C. § 30121.

3. "If the Commission, upon receiving a complaint . . . has reason to believe that a person has committed, or is about to commit, a violation of [the FECA] . . . [t]he Commission *shall make an investigation* of such alleged violation . . . ." 52 U.S.C. § 30109(a)(2) (emphasis added); *see also* 11 C.F.R. § 111.4(a).

### FACTS

4. On December 2, 2017, the Trump Victory Fund (I.D.: C00618389) held a fundraiser at the Cipriani restaurant in New York City,<sup>1</sup> and, according to reports in the *Washington Post*<sup>2</sup> and *Miami Herald*,<sup>3</sup> multiple Chinese nationals posed for pictures with President Trump at that fundraiser—a privilege reserved for contributors who

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<sup>1</sup> Eyewitness News, *President Trump in New York City for Fund-Raising Events*, ABC 7 (Dec. 2, 2017), <https://abc7ny.com/trump-heads-to-nyc-to-host-series-of-fundraisers/2727050/>.

<sup>2</sup> Michelle Ye Hee Lee, Anu Narayanswamy, Emily Rauhala & Simon Denyer, *Invitations Offer Wealthy Chinese Access to President Trump at Fundraiser*, WASH. POST (May 25, 2018), [https://www.washingtonpost.com/politics/invitations-offer-wealthy-chinese-access-to-president-trump-at-fundraiser/2018/05/25/3bc6a8ae-5e90-11e8-a4a4-c070ef53f315\\_story.html](https://www.washingtonpost.com/politics/invitations-offer-wealthy-chinese-access-to-president-trump-at-fundraiser/2018/05/25/3bc6a8ae-5e90-11e8-a4a4-c070ef53f315_story.html).

<sup>3</sup> Sarah Blaskey, Nicholas Nehamas & Caitlin Ostroff, *Cindy Yang Helped Chinese Tech Stars Get \$50K Photos With Trump. Who Paid?*, MIAMI HERALD (Mar. 21, 2019), <https://www.miamiherald.com/latest-news/article227941749.html>.

gave \$50,000. For example, the *Post* reported that Li Xiaohua, chairman of Huada International Investment Group, received a photograph with the President,<sup>4</sup> and the *Herald* reported that “cryptocurrency guru” Ryan Xu also received a picture.<sup>5</sup> Neither Xiaohua nor Xu appears to be a U.S. national, according to the *Post* and the *Herald*, nor do their names appear in Commission records as contributors in the 2018 election cycle or past cycles. According to the *Post*,

A Republican Party official who spoke on the condition of anonymity to discuss individuals at a private fundraiser said the Chinese visitors to the Dec. 2 gathering in New York — which encompassed several events, including a breakfast with Trump — were guests of a U.S. citizen donor, whom the official declined to name.<sup>6</sup>

5. The *Miami Herald* later reported that Cindy Yang, who “runs a Florida-based consulting business called GY US Investments that promises to introduce Chinese investors into the president’s orbit,” had “arranged the presence of a large group of business people from mainland China” at the December 2017 event in her capacity as a fundraiser for the National Committee of Asian American Republicans (also known as the “Asian GOP”).<sup>7</sup> The *Miami Herald* identified several of Yang’s guests at this fundraiser from its review of photos and social media posts, none of whom appear in Commission records as having contributed to Trump Victory in their own names.<sup>8</sup>

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<sup>4</sup> Lee, Narayanswamy, Rauhala & Denyer, *supra* note 2.

<sup>5</sup> Blaskey, Nehamas & Ostroff, *supra* note 3.

<sup>6</sup> Lee, Narayanswamy, Rauhala & Denyer, *supra* note 2.

<sup>7</sup> Nicholas Nehamas, Caitlin Ostroff & Sarah Blaskey, *Massage Parlor Magnate Helped Steer Chinese to Trump NYC Fundraiser, Attendee Says*, MIAMI HERALD (Mar. 9, 2019), <https://www.miamiherald.com/news/politics-government/article227358809.html>.

<sup>8</sup> Aaron Albright, Sarah Blaskey, Caitlin Ostroff & Nicholas Nehamas, *Who Has Gained Access to President Trump and Mar-a-Lago Through Cindy Yang?*, MIAMI HERALD (Apr. 8, 2019), <https://www.miamiherald.com/news/nation-world/article228882284.html>. The *Herald* identified Xianqin Qu, Ren Mulhua, Tong Jingling, Jie Yang, Wu Hao, Lou Li, Jiang Rul, Shanjie Li, Yun Li, Huang Yacun, Liang Lu, Lu Zihan, and Zijing Xu as Yang’s guests. *Id.*; see also Blaskey, Nehamas & Ostroff, *supra* note 3.

“However,” the *Herald* reported, “in the weeks before the event, Yang and three associates embarked on a flurry of giving to Trump Victory”:

Yang donated \$23,500 in three payments. Li Jing, a New York-based Chinese socialite who once told a Chinese-language magazine that there is “zero distance” between her and the Trumps, gave \$27,000. (The Asian GOP’s director said Jing had helped Yang recruit guests.)

Although one guest interviewed by the *Herald* said he got his ticket through Jing, she denied being a recruiter or fundraiser for the Asian GOP. She said any donation she made was for herself only and she could not recall contributing \$25,000, although she said she made two \$1,000 donations around that time.

Jon Deng, whom the Asian GOP website listed as director of its Palm Beach County chapter, and his wife donated \$85,000. Neither appears to have attended the event in New York.

Hui Liu said her husband, Deng, was traveling. Asked about the donations, she said: “I do not want to talk about that.” Deng did not return phone messages.<sup>9</sup>

6. Cliff Zhonggang Li, the executive director of the National Committee of Asian American Republicans, told *Mother Jones* “that Yang, working as a volunteer for his group, brought 20 to 30 people to the December 2017 fundraiser in New York. He said Yang’s guests were part of a group of more than 100 Chinese Americans and Chinese citizens who were present at the event, which was reportedly attended by roughly 400 people.”<sup>10</sup> “I don’t know if they contributed indirectly or not,” Li told *Mother Jones*, referring to Chinese citizens:

Li said that he believed Chinese executives who attended may have lacked green cards or US citizenship, and that he was concerned that some attendees might have funneled illegal donations through American straw donors. He noted that he was especially worried about attendees who were not part of the group Yang

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<sup>9</sup> Blaskey, Nehamas & Ostroff, *supra* note 3.

<sup>10</sup> Dan Friedman, *Head of Asian GOP Group Says He ‘Wouldn’t Rule Out’ Illegal Foreign Donations to Trump*, MOTHER JONES (Mar. 15, 2019), <https://www.motherjones.com/politics/2019/03/head-of-asian-gop-group-says-he-wouldnt-rule-out-illegal-foreign-donations-to-trump/>.

brought. But he said he could not rule out similar issues among the contingent that she worked with. “I couldn’t vet everyone,” he said. “I wouldn’t rule out the possibility of wrongdoing.”

Li emphasized that he was not asserting that Yang broke the law. But “nobody can really investigate everyone to make sure that there was no indirect under the table contribution,” he said. “She was bringing people from outside the Asian GOP into this event. I just don’t know.”<sup>11</sup>

7. The *Miami Herald* later reported that Xinyue “Daniel” Lou, a “United States-based promoter for the Chinese Communist Party” and a U.S. citizen, had brought “30 Chinese guests” to the December 2, 2017 fundraiser, after which he “signed a contract with the Republican National Committee to become an official fundraiser for President Donald Trump's reelection campaign at the same time Trump was launching a bellicose trade war against Lou's homeland”:<sup>12</sup>

According to Lou's LinkedIn, RNC Chairwoman Ronna McDaniel offered Lou an official position as a volunteer fundraiser for Trump Victory after Lou brought 30 Chinese guests to a \$2,700-per-seat fundraiser for Trump's reelection held at Cipriani Restaurant in New York on Dec. 2, 2017. As an official fundraiser, Lou subsequently advertised Trump campaign events across the country to his friends on WeChat.

Lou told the *Herald* the RNC had advised him not to comment on his fundraising activities for the committee, his association with Yang, or his previous activities in conjunction with the Communist Party.<sup>13</sup>

8. The *Herald* further reported:

It's a strange-bedfellows tale with national security implications. Trump needed to fill seats at private galas and campaign events, while Chinese capitalists wanted to cozy up to the American businessman-turned-president—an interest encouraged by a communist government looking for access.

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<sup>11</sup> *Id.*

<sup>12</sup> Sarah Blaskey, Caitlin Ostroff, Jay Weaver & Nicholas Nehamas, *How a Chinese Communist Party Promoter Tied to Cindy Yang Joined the Trump Campaign*, MIAMI HERALD (Apr. 25, 2019), <https://www.miamiherald.com/news/politics-government/article229151249.html>.

<sup>13</sup> *Id.*; see also Daniel Lou, LinkedIn, <https://www.linkedin.com/in/daniel-lou-0b922a/> (last viewed May 6, 2019) (Where Lou writes, “After successfully organized 30 Chinese Trump Supporters to attend Breakfast with President Trump event in New York City on December 2 2017, I was invited by RNC Chairwoman Ronna McDaniel to join the Trump Victory Finance Committee as a volunteer fund raiser and has successfully participated in the fund raising functions in Cleveland and Dallas since.”).

Out of this marriage of supply and demand emerged a tacitly Chinese state-endorsed gray market selling tickets to Trump-related events to Chinese business people. It's where Lou's life overlapped with that of Li "Cindy" Yang founder of a chain of South Florida Asian day spas, whose latest start-up involved selling presidential access over Chinese-language social media.<sup>14</sup>

9. On March 3, 2018, Trump Victory held a fundraiser at Mar-a-Lago, with reception admission contingent on a minimum \$2,700 contribution, two seats for dinner in exchange for raising \$25,000, and two dinner tickets and a photo with President Trump in exchange for raising \$50,000, in \$5,400 increments.<sup>15</sup> An invitation circulated in Chinese language media by the company AmeriChina, a translated version of which is attached as Exhibit A, offered “Chinese entrepreneur leaders” a package where they would fly to Palm Beach and “[p]articipate in the dinner and take a one-on-one photo with Trump.” The invitation described RNC Chair Ronna McDaniel and RNC finance chair Todd Ricketts as the “host[s]” of the event. Cindy Yang attended this fundraiser and appeared in a signed photograph with the President;<sup>16</sup> the *New York Times* reported that “[o]ver the weeks leading up to the event, at least nine people in Ms. Yang’s orbit, some of them with modest incomes, made donations at exactly \$5,400”:

One of the \$5,400 political donations came from a 25-year-old woman who gives facials at a beauty school, in a strip mall in nearby Palm Beach Gardens that is owned by Ms. Yang’s family. Another \$5,400 came from a woman who says she worked as a receptionist at a massage parlor owned by Ms. Yang’s husband. A third gift of \$5,400 came from an associate of Ms. Yang’s who had been charged

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<sup>14</sup> Blaskey, Ostroff, Weaver & Nehamas, *supra* note 12.

<sup>15</sup> See, e.g., Alex Leary, *Trump Fundraiser Set for Mar-a-Lago in March*, TAMPA BAY TIMES (Feb. 3, 2018), <https://www.tampabay.com/florida-politics/buzz/2018/02/03/trump-fundraiser-set-for-mar-a-lago-in-march/>; see also George Bennett, *Mar al Lago Make-Up: Trump to Headline March 3 Fundraiser*, POST ON POLITICS BLOG (Feb. 3, 2018), <http://postonpolitics.blog.palmbeachpost.com/2018/02/03/mar-a-lago-make-up-trump-to-headline-march-3-fundraiser/>; <https://cmgpbppostonpolitics.files.wordpress.com/2018/02/trump-invite.jpg>.

<sup>16</sup> Nehamas, Ostroff & Blaskey, *supra* note 7.



in 2014 after a prostitution sting with practicing health care without a license, police records show.<sup>17</sup>

The receptionist, Bingbing Peranio, told the *New York Times* that Yang had helped fill out the check to the President's campaign, and refused to answer if Yang had reimbursed her for the contribution.<sup>18</sup> Since that reporting, the FBI has reportedly opened an investigation into whether Yang reimbursed Peranio for the contribution or "illegally funneled money from China into the president's re-election effort," and has issued a subpoena to Peranio.<sup>19</sup> According to the *Miami Herald's* review of photos and social media posts, at least four other individuals were Yang's guests at this fundraiser.<sup>20</sup>

10. On May 31, 2018, Trump Victory held a fundraiser in Dallas, Texas. The *Post* obtained an invitation to the event, attached as Exhibit B, which was reportedly "circulated to dozens of wealthy entrepreneurs in China":

Topped with the insignia of a real Republican committee raising money for the party and President Trump's reelection campaign, it purported to offer a handshake and a one-on-one photo with the president for \$100,000 — a "VVIP" trip "to be remembered for a lifetime."

The invitation, which Republican Party officials say they had nothing to do with, was not the only such offer. At least two other China-based companies circulated similar solicitations in the past week, offering access to Trump at an official fundraiser in Dallas on May 31, and charging two or three times the price of a ticket.<sup>21</sup>

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<sup>17</sup> Frances Robles, Michael Forsythe & Alexandra Stevenson, *She Extols Trump, Guns & the Chinese Communist Party Line*, N.Y. TIMES (Mar. 16, 2019), <https://www.nytimes.com/2019/03/16/us/cindy-yang-trump-donations.html>.

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

<sup>19</sup> Jay Weaver, Nicholas Nehamas, Caitlin Ostroff & Sarah Blaskey, *Feds Open Foreign-Money Investigation Into Trump Donor Cindy Yang*, MIAMI HERALD (May 9, 2019), <https://www.miamiherald.com/news/politics-government/article230217729.html>.

<sup>20</sup> Albright, Blaskey, Ostroff & Nehamas, *supra* note 8 (identifying Lu Kunning, Lu Biao, Yuan Yue, and Zhu Ruining as Yang's guests).

<sup>21</sup> Lee, Narayanswamy, Rauhala & Denyer, *supra* note 2.

11. The *Post* reported that a Beijing-based man named Sun Changchun organized the invite to the May 31, 2018 Dallas fundraiser, and also arranged for Chinese nationals to attend the December 2, 2017 New York fundraiser.<sup>22</sup> According to the *Post*, he was:

promoting the Dallas event on WeChat, a Chinese messaging service. He claimed to have arranged both the Dallas and New York trips. He told *The Post* that he planned to give the Dallas ticket proceeds to the RNC, but provided no evidence to substantiate that assertion or any relationship with the RNC. His understanding, he said, was that the RNC would in turn donate the money to charity.

Sun's invite claims that he and his associates have "prior experience participating in three Republican president dinners in 2017," including the New York visit. *The Post* could not independently verify his involvement in any trips.

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*The Post* contacted several Chinese guests whose U.S. trips Sun claims to have facilitated, including Li, but none agreed to an interview.<sup>23</sup>

12. On June 29, 2018, Trump Victory held a fundraiser in Milwaukee, Wisconsin. An invitation circulated by the company "Buds" on Chinese language media, a translated version of which is attached as Exhibit C, invited "three Chinese entrepreneurs to visit the United States" and attend the fundraiser, and take a picture with the President.<sup>24</sup> The invitation does not list prices, but according to the *Milwaukee Business Journal*, "For admission to lunch, a listing on the host board and a photo opportunity with Trump, a couple pays \$25,000. At \$35,000 for an individual and \$50,000 for a couple, contributors get a photo opportunity, a seat at a roundtable and a listing on the host board."<sup>25</sup> A translated version of the invite stated:

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<sup>22</sup> *Id.*

<sup>23</sup> *Id.*

<sup>24</sup> Exhibit C.

<sup>25</sup> Rich Kirchen, *Trump's planned Milwaukee visit for Foxconn groundbreaking includes \$2,700-\$100,000 per couple fundraiser*, MILWAUKEE BUSINESS JOURNAL (Jun. 7, 2018),

- On June 29th, we will invite three Chinese entrepreneurs to visit the United States to attend the luncheon of US President Trump, when President Trump will attend the banquet in person. The luncheon is designed for business communication. You will meet face-to-face with President Trump to introduce business plans and needs, and in the discussion with business leaders, grasp the development trend of Sino-US economic and trade relations in advance, and at the same time promote individuals. Reputation and the creation of corporate IP images provide a good opportunity. In addition, you will receive a separate photo shoot with the President, photographed by a White House professional photographer. The event was co- chaired by US Republican President Ronald McDaniel, Finance Chairman Todd Ricketts and Wisconsin's Finance Chairman Ted Kellner.<sup>26</sup>
13. The translated invitation states that an attendee must “[h]old a US visa or green card (Chinese identity: passport of the person to be submitted, personal profile in Chinese and English, company profile; US identity: submit driver's license, social security number)” and submit their passport for a background check.<sup>27</sup>
  14. On March 16, 2018, the Palm Beach Republican Party held its annual Lincoln Day fundraiser at President Trump’s Mar-a-Lago.<sup>28</sup> Cindy Yang attended the event and it was advertised on the National Committee of Asian American Republicans’ website. A “VIP” invitation circulated in Chinese media, a translated version of which is attached as Exhibit D, advertised the Lincoln Day event and suggested attendees could access Ivanka Trump.
  15. On May 22, 2019, the *Washington Post* reported that invitations like these, “promoted online to wealthy entrepreneurs in China,” are “part of a sprawling cottage industry claiming to provide intimate access to Trump, sometimes at official Republican

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<https://www.bizjournals.com/milwaukee/news/2018/06/07/trumps-plannedmilwaukee-visit-for-foxconn.html>.

<sup>26</sup> Exhibit C.

<sup>27</sup> *Id.*

<sup>28</sup> *Lincoln Day Dinner 2019: Sponsorship Levels*, PALM BEACH COUNTY REPUBLICAN PARTY, <https://www.lincolnday.gop/sponsorship> (last visited May 22, 2019).

fundraisers and often for a hefty fee.”<sup>29</sup> The *Post* spoke to an employee of HGGT Limited, “a financial services company registered in Hong Kong that operates in mainland China,” which is circulating an invitation to a June 2019 “President Trump Breakfast” at Mar-a-Lago. A translated version of the invitation is attached as Exhibit E. The invitation is on “Trump Victory” letterhead and states that “RNC Chairwoman Ronna McDaniel and National Finance Chairman Todd Ricketts cordially invite you to a breakfast reception” with President Trump, offering packages priced at \$70,000 and \$15,000.<sup>30</sup> RNC officials told the *Post* that no such event is planned and that they did not authorize the company to use the logo for Trump Victory.<sup>31</sup> The translated website accompanying the invitation describes a “Trump breakfast meeting” limited to 300 participants, and says that “[a] green card or citizen can take a photo with President Trump.”<sup>32</sup> According to the *Post*:

Reached by The Post, an HGGT employee said the company’s owner routinely receives what she described as authentic invitations to exclusive Trump events in the United States and sells some or all of his allotted seats to Chinese nationals.

Communicating via HGGT’s account on WeChat, a Chinese social media platform, the woman gave her name as Cici and said she was a personal assistant to the chief executive and founder, Ma Jin.

The assistant declined to provide her last name or make Ma available for an interview. But a human resources official, contacted at the company by phone, said that anyone reached through the official WeChat account is a confirmed employee of the company.

Cici declined to describe Ma’s citizenship or residency status.

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<sup>29</sup> Michelle Ye Hee Lee, Anu Narayanswamy & Lyric Li, *In China, a Flourishing Industry Claims to Sell Access to President Trump*, WASH. POST (May 22, 2019), [https://www.washingtonpost.com/politics/in-china-a-flourishing-industry-claims-to-sell-access-to-president-trump/2019/05/22/10bd91a0-7739-11e9-bd25-c989555e7766\\_story.html](https://www.washingtonpost.com/politics/in-china-a-flourishing-industry-claims-to-sell-access-to-president-trump/2019/05/22/10bd91a0-7739-11e9-bd25-c989555e7766_story.html).

<sup>30</sup> Exhibit E at 8.

<sup>31</sup> Lee, Narayanswamy & Li, *supra* note 29.

<sup>32</sup> Exhibit E at 9.

Ma's name did not turn up in federal databases of donors who have given more than \$200 to political committees.

Asked whether the company was aware that foreigners are not allowed to make campaign contributions, Cici replied, "Thank you, we are fully aware of that." She then cut off the conversation and blocked the reporter from contacting her.<sup>33</sup>

16. Other invitations circulated in Chinese media include:
  - a. An invitation to President Trump's January 20, 2017 inauguration, which describe the perks associated with donations to the inaugural committee above \$25,000, \$100,000, \$250,000, \$500,000, and \$1 million, but which advertises tickets costing approximately \$28,200 (\$189,500 yuan) to "[o]ccupy the best viewing position seated at the inauguration ceremony, witnessed Trump's oath of office." A translated version is attached as Exhibit F.
  - b. An invitation to an October 2, 2017 "Golden Autumn Dinner" event with President Trump in Washington, D.C., including "a chance to take photos with the President" at a cost of "\$205,000/person." A translated version is attached as Exhibit G.<sup>34</sup>
  - c. An invitation to a February 25, 2018 "Presidential Private Estate Presidential Meeting" at Mar-a-Lago, a translated version of which is attached as Exhibit H, which appears to relate to a gala fundraiser for a nonprofit called "The Truth About Israel."<sup>35</sup> Participation was limited to ten "Chinese entrepreneurs," each charged approximately \$56,000 (380,000 yuan), with the

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<sup>33</sup> Lee, Narayanswamy & Li, *supra* note 29.

<sup>34</sup> There does not appear to be a public record of a Trump Victory fundraiser in Washington, D.C., on October 2, 2017. However, President Trump was in Washington D.C. on that date. *See Trump Discusses Immigration Ideas in Dinner With Republican Lawmakers*, REUTERS (Oct. 2, 2017), <https://www.reuters.com/article/us-usa-immigration/trump-discusses-immigration-ideas-in-dinner-with-republican-lawmakers-idUSKCN1C803M>.

<sup>35</sup> *See* THE TRUTH ABOUT ISRAEL GALA, <http://truthaboutisraelgala.org> (last visited May 6, 2019).

invitation noting, “Because this event is a charity dinner, so the photo with the president is lower than the regular price.”<sup>36</sup> Yang attended this event with three guests, according to the *Miami Herald*.<sup>37</sup>

- d. An invitation to a December 31, 2018 New Year’s Eve event at Mar-a-Lago, a translated version of which is attached as Exhibit I, charging between \$120,000 and \$150,000 for up to four people, noting “a professional photographer has the opportunity to take a photo with the president and the president’s family at the reception.”

#### **SUMMARY OF THE LAW**

17. Federal law prohibits a foreign national from directly or indirectly making a contribution in connection with a Federal, State, or local election, 52 U.S.C. § 30121(a)(1), and prohibits any other person from soliciting a foreign national to make such a contribution, *id.* § 30121(a)(2), or from knowingly providing substantial assistance in the solicitation, making, acceptance or receipt of such a contribution, 11 C.F.R. § 110.20(h)(1).
18. “Contribution” is defined as “any gift . . . of money or anything of value made by any person for the purpose of influencing any election for Federal office.” 52 U.S.C. § 30101(8)(A)(i).

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<sup>36</sup> Exhibit H at 5.

<sup>37</sup> Albright, Blaskey, Ostroff & Nehamas, *supra* note 8 (identifying Kui Zhang, Lei Yu, and Jie Yong as Yang’s guests).

19. “Foreign national” is defined as (1) a “foreign principal,” such as a foreign corporation,<sup>38</sup> and (2) “an individual who is not a citizen of the United States or a national of the United States.” 52 U.S.C. § 30121(b)(1-2).
20. Commission regulations provide that “a foreign national shall not, directly or indirectly, make a contribution or a donation of money or other thing of value, or expressly or impliedly promise to make a contribution or a donation, in connection with any Federal, State, or local election.” 11 C.F.R. § 110.20(b).
21. Commission regulations additionally provide that “[n]o person shall knowingly provide substantial assistance in the solicitation, making, acceptance or receipt of a contribution or donation” prohibited under this section. *Id.* § 110.20(h)(1).
- “Substantial assistance” refers to “active involvement in the solicitation, making, receipt or acceptance of a foreign national contribution or donation with an intent to facilitating the successful completion of the transaction.”<sup>39</sup> Such substantial assistance is provided “knowingly” if the person is “aware of facts that would lead a reasonable person to inquire whether the source of the funds solicited, accepted or received is a foreign national, but the person failed to conduct a reasonable inquiry,” *id.*
- § 110.20(a)(4)(iii), or if a person is “aware of facts that would lead a reasonable person to conclude that there is a substantial probability that the source of the funds solicited, accepted or received is a foreign national,” *id.* § 110.20(a)(ii). Pertinent facts include whether the contributor or donor resides abroad, *id.* § 110.20(a)(5)(iv),

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<sup>38</sup> The statute cross-references the definition of “foreign principal” at 22 U.S.C. § 611(b), which defines “foreign principal” to include “a partnership, association, corporation, organization, or other combination of persons organized under the laws of or having its principal place of business in a foreign country.” 22 U.S.C. § 611(b)(3).

<sup>39</sup> Explanation and Justification for 11 C.F.R. § 110, 67 Fed. Reg. 69928, 69945-46 (Nov. 19, 2002) <https://sers.fec.gov/fosers/showpdf.htm?docid=3182>.

uses a foreign address, *id.* § 110.20(a)(5)(ii), or uses a foreign passport for identification purposes, *id.* § 110.20(a)(5)(i).

22. FECA additionally provides that “[n]o person shall make a contribution in the name of another person or knowingly permit his name to be used to effect such a contribution and no person shall knowingly accept a contribution made by one person in the name of another person.” 52 U.S.C. § 30122.
23. The Commission regulation implementing the statutory prohibition on “contributions in the name of another” provides the following examples of “contributions in the name of another”:
  - a. “Giving money or anything of value, all or part of which was provided to the contributor by another person (the true contributor) without disclosing the source of money or the thing of value to the recipient candidate or committee at the time the contribution is made,” 11 C.F.R. § 110.4(b)(2)(i), and
  - b. “Making a contribution of money or anything of value and attributing as the source of the money or thing of value another person when in fact the contributor is the source.” *Id.* § 110.4(b)(2)(ii).
24. The requirement that a contribution be made in the name of its true source promotes Congress’s objective of ensuring the complete and accurate disclosure by candidates and committees of the political contributions they receive,<sup>40</sup> and ensures that the

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<sup>40</sup> *United States v. O'Donnell*, 608 F.3d 546, 553 (9th Cir. 2010) (“[T]he congressional purpose behind [Section 30122]—to ensure the complete and accurate disclosure of the contributors who finance federal elections— is plain.”) (emphasis added); *Mariani v. United States*, 212 F.3d 761, 775 (3d Cir. 2000) (rejecting constitutional challenge to Section 30122 in light of the compelling governmental interest in disclosure).



public and complainant Christ have the information necessary to evaluate candidates for office and cast an informed vote.

### CAUSES OF ACTION

**I. CINDY YANG, DANIEL LOU, SUN CHANGCHUN, MARGARET YANG, JIUSI YAO, MA JIN, AND JOHN AND/OR JANE DOE VIOLATED THE BAN ON KNOWINGLY PROVIDING SUBSTANTIAL ASSISTANCE TO FOREIGN NATIONALS MAKING CONTRIBUTIONS**

25. FECA prohibits any person from knowingly providing substantial assistance in the solicitation, making, acceptance or receipt of a foreign national's contribution. 11 C.F.R. § 110.20(h)(1). Such substantial assistance is provided "knowingly" if a person is "aware of facts that would lead a reasonable person to conclude that there is a substantial probability that the source of the funds solicited, accepted or received is a foreign national." *Id.* § 110.20(a)(ii).
26. According to published reports, for over two years, Chinese nationals residing in China have been invited to U.S. fundraisers for committees including Trump Victory Fund, Donald J. Trump for President, Inc., the RNC, the Palm Beach Republican Party, and the 45th Presidential Inaugural Committee, often at a six-figure cost. These invitations "are part of a sprawling cottage industry claiming to provide intimate access to Trump, sometimes at official Republican fundraisers and often for a hefty fee,"<sup>41</sup> and offer attendees an opportunity to attend fundraisers where admission is generally contingent on making a contribution, and/or to take a picture with the President, a privilege only afforded to contributors who give or raise between \$25,000 and \$50,000. Organizers made clear that these excursions were for political

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<sup>41</sup> Lee, Narayanswamy & Li, *supra* note 29.

fundraising events, in some cases including the insignia of the Trump Victory Fund so that the invitation resembled an official fundraising invitation. Published reports and photographs posted on social media indicate that multiple Chinese nationals who participated in these “VIP” excursions have gained admission to U.S. fundraisers, and some have taken photographs with the President. For example:

- a. A December 2, 2017 Trump Victory fundraiser in New York City with a \$1,000 admission fee attended by “a large group of business people from mainland China,”<sup>42</sup> and where apparent Chinese nationals appeared in photographs with the President, a privilege reserved for \$50,000 contributors;<sup>43</sup> one organizer expressed concern that “Chinese executives who attended may have lacked green cards or US citizenship” and “that some attendees might have funneled illegal donations through American straw donors”;<sup>44</sup>
- b. A March 3, 2018, Trump Victory fundraiser at Mar-a-Lago, with an invitation offering “Chinese entrepreneur leaders” a package to fly to Palm Beach and “[p]articipate in the dinner and take a one-on-one photo with Trump,”<sup>45</sup> a privilege reserved for individuals who raised \$50,000 in \$5,400 increments. Cindy Yang appeared in a photo at the event after “at least nine people in Ms. Yang’s orbit, some of them with modest incomes, made donations at exactly \$5,400,”<sup>46</sup> triggering an FBI investigation into potential straw donations or

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<sup>42</sup> Nehamas, Ostroff & Blaskey, *supra* note 7.

<sup>43</sup> Blaskey, Nehamas & Ostroff, *supra* note 3; Lee, Narayanswamy, Rauhala & Denyer, *supra* note

2.  
<sup>44</sup> Friedman, *supra* note 10.

<sup>45</sup> See Exhibit A.

<sup>46</sup> Robles, Forsythe & Stevenson, *supra* note 17.

foreign national contributions;<sup>47</sup> Yang additionally invited at least four guests,<sup>48</sup>

- c. A May 31, 2018 Trump Victory fundraiser in Dallas, with an invitation “circulated to dozens of wealthy entrepreneurs in China” that was “[t]opped with the insignia of a real Republican committee raising money for the party and President Trump’s reelection campaign [that] purported to offer a handshake and a one-on-one photo with the president for \$100,000,” organized by a Beijing-based company that claimed “prior experience participating in three Republican president dinners in 2017”,<sup>49</sup>
- d. A June 29, 2018 Trump Victory fundraiser in Milwaukee, Wisconsin, with an invitation to “three Chinese entrepreneurs to visit the United States to attend the luncheon of US President Trump,” and offering “a separate photo shoot with the President, photographed by a White House professional photographer,”<sup>50</sup> a privilege reserved for individuals who contributed at least \$25,000;<sup>51</sup> and
- e. A March 16, 2018 fundraiser for the Palm Beach Republican Party at Mar-a-Lago, with a “VIP” invitation circulated in Chinese media suggesting attendees could access Ivanka Trump.<sup>52</sup>

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<sup>47</sup> Nehamas, Ostroff & Blaskey, *supra* note 7.

<sup>48</sup> Albright, Blaskey, Ostroff & Nehamas, *supra* note 8 (identifying Lu Kunming, Lu Blao, Yuan Yue, and Zhu Ruining as Yang’s guests).

<sup>49</sup> Lee, Narayanswamy, Rauhala & Denyer, *supra* note 2; *see also* Exhibit B.

<sup>50</sup> Exhibit B.

<sup>51</sup> Kirchen, *supra* note 25; *see also* Lee, Narayanswamy & Li, *supra* note 29 (confirming that “[t]he fundraiser advertised did occur”).

<sup>52</sup> *See* Exhibit D; *see also* *Lincoln Day Dinner 2019: Sponsorship Levels*, *supra* note 28.

27. In response to media inquiries, RNC officials and excursion organizers have claimed that the foreign nationals appearing at closed-door fundraisers and in \$50,000 photographs with the President are “guests” of U.S. nationals who made contributions using their own personal funds.<sup>53</sup> But it is not plausible that dozens of wealthy U.S. nationals are routinely making contributions of up to \$50,000 using their own funds, and then are passing the perks associated with that contribution to a Chinese tourist who paid a travel firm many times that amount. It is far more likely that U.S. nationals are being reimbursed for their contributions using some portion of the funds paid by Chinese nationals towards these “VVIP” travel packages.<sup>54</sup> It is not known whether U.S. nationals are making contributions using their personal funds, and then being reimbursed for those contributions by selling the event tickets and photo opportunities to foreign nationals,<sup>55</sup> or whether the U.S. nationals are first receiving payment from foreign nationals for political tourism packages and using those funds to make contributions; in either case, it results in a foreign national directly or indirectly making a contribution, in violation of 52 U.S.C. § 30121.
28. Cindy Yang, as the head of a “consulting business called GY US Investments that promises to introduce Chinese investors into the president’s orbit” and fundraiser for

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<sup>53</sup> See, e.g., Lee, Narayanswamy, Rauhala & Denyer, *supra* note 2.

<sup>54</sup> This inference is strengthened by the fact that travel packages offering access to the president at non-political fundraisers are offered at a discount. Compare Exhibit H (“Because this event is a charity dinner, so the photo with the president is lower than the regular price”), with Exhibit A-D, F-G, I. The itineraries for political and non-political tourism excursions are similar, *see id.*, so the travel and logistical costs for political and non-political fundraisers should also be similar. The fact that foreign nationals are charged a higher rate to attend a political fundraiser is further evidence that some portion of their funds is being used to make contributions in order to gain access to the fundraiser.

<sup>55</sup> In an interview with the *Washington Post*, one employee of a travel firm “said the company’s owner routinely receives what she described as authentic invitations to exclusive Trump events in the United States and sells some or all of his allotted seats to Chinese nationals.” Lee, Narayanswamy & Li, *supra* note 29. The owner’s name did not appear in Commission records as having made contributions. *Id.*

the Asian GOP, “arranged the presence of a large group of business people from mainland China” to attend a Trump Victory fundraiser in December 2017, and “[i]n online ads targeting overseas clients — mostly from China — Yang promoted schmoozy fundraisers as opportunities to mingle with Trump, his family and other top Republicans.”<sup>56</sup> Reporting by the *Miami Herald* identified multiple foreign nationals who were Yang’s “guests” at fundraisers for federal or local political committees,<sup>57</sup> and a Yang associate told *Mother Jones* “that he was concerned that some attendees [at the December 2017 fundraiser] might have funneled illegal donations through American straw donors.”<sup>58</sup>

29. Daniel Lou, a “United States-based promoter for the Chinese Communist Party,” brought “30 Chinese guests” to the December 2017 Trump Victory fundraiser, after which he “signed a contract with the Republican National Committee to become an official fundraiser for President Donald Trump's reelection campaign.”<sup>59</sup>
30. The Beijing-based Sun Changchun is the “head of a Chinese cultural exchange company” who claims to have also arranged for Chinese nationals to attend the December 2017 RNC fundraiser. He circulated an invitation to the May 2018 Trump Victory fundraiser “to dozens of wealthy entrepreneurs in China” promising a \$100,000 photo with the President, and has boasted of experience “participating in three Republican president dinners in 2017.”<sup>60</sup> Changchun told the *Washington Post* that he planned to give the proceeds from one fundraising event to the RNC.<sup>61</sup>

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<sup>56</sup> Albright, Blaskey, Ostroff & Nehamas, *supra* note 8.

<sup>57</sup> *Id.*

<sup>58</sup> Friedman, *supra* note 10.

<sup>59</sup> Blaskey, Ostroff, Weaver & Nehamas, *supra* note 12.

<sup>60</sup> Exhibit B; *see also* Lee, Narayanswamy, Rauhala & Denyer, *supra* note 2.

<sup>61</sup> Lee, Narayanswamy, Rauhala & Denyer, *supra* note 2.

31. Margaret Yang is the founder of AmeriChina Group, a company based in Beijing and New York offering high-end U.S. tours to Chinese clients.<sup>62</sup> According to an invitation posted on the website Sohu, AmeriChina invited “Chinese entrepreneur leaders” to attend the March 2018 Trump Victory fundraiser at Mar-a-Lago and to “[p]articipate in the dinner and take a one-on-one photo with Trump,” an opportunity reserved for individuals who raise \$50,000 in \$5,400 increments.<sup>63</sup> (When contacted by the *Washington Post*, Yang claimed the “invitation appears to have been altered using her company’s logo,” but did not provide an explanation.<sup>64</sup> AmeriChina continues to post other tours under the same account, on the same website.<sup>65</sup>) The AmeriChina website also advertised a customized trip to President Trump’s inauguration,<sup>66</sup> with Yang marketing “a \$15,000 package to the official inauguration ceremony and the formal ball” to Chinese clients.<sup>67</sup>
32. Jiusi Yao is the founder of “Buds,” described as “China’s first design and life aesthetics brand,” whose website advertises U.S. tours to Chinese clients.<sup>68</sup> Buds invited “three Chinese entrepreneurs to visit the United States” to attend the June 29,

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<sup>62</sup> AmeriChina Group, *Founder*, <https://www.americhinagroup.com/en/about#en/founder> (last visited May 10, 2019).

<sup>63</sup> Exhibit A.

<sup>64</sup> Lee, Narayanswamy & Li, *supra* note 29.

<sup>65</sup> Compare AmeriChina, [AxC invites] *US President Trump invites you to participate in the Republican dinner - March 2, China's outstanding entrepreneurs leaders open a new path of Sino-US business cooperation* (Feb. 11, 2018), [http://www.sohu.com/a/222136553\\_527054](http://www.sohu.com/a/222136553_527054), with AmeriChina profile, SoHu.com, [https://mp.sohu.com/profile?xpt=YW1lcmljaGluYWdyb3VwQHNvaHUuY29t&f=index\\_pagemp\\_2&spm=smpc.content.author.3.1557501420446l6c3dyU](https://mp.sohu.com/profile?xpt=YW1lcmljaGluYWdyb3VwQHNvaHUuY29t&f=index_pagemp_2&spm=smpc.content.author.3.1557501420446l6c3dyU) (last visited May 22, 2019).

<sup>66</sup> AmeriChina Group, *President Inauguration*, <https://www.americhinagroup.com/president-inauguration> (last visited May 10, 2019).

<sup>67</sup> Hezi Jiang & Wang Linyan, *Chinese Securing Their Places at Inauguration*, CHINA DAILY (Jan. 20, 2017), [http://usa.chinadaily.com.cn/us/2017-01/20/content\\_28015463.htm](http://usa.chinadaily.com.cn/us/2017-01/20/content_28015463.htm).

<sup>68</sup> See Buds, <https://feng.ifeng.com/author/357978>.

2018 Trump Victory fundraiser in Milwaukee, and to take a photo with the president,<sup>69</sup> a privilege reserved for individuals who contributed at least \$25,000.<sup>70</sup>

33. Ma Jin is the owner of HGGT Limited, “a financial services company registered in Hong Kong that operates in mainland China,” which is circulating an invitation to a June 2019 “President Trump Breakfast” at Mar-a-Lago.<sup>71</sup> Although the RNC told the *Washington Post* that this particular event is not scheduled, according to an HGGT Limited employee, Jin “routinely receives what [the employee] described as authentic invitations to exclusive Trump events in the United States and sells some or all of his allotted seats to Chinese nationals.”<sup>72</sup>
34. The organizers of other fundraising excursions (John and/or Jane Doe), such as those described in Exhibits D, E, F, G, and I, similarly targeted Chinese nationals with Chinese language appeals, including, for example, offering airfare from mainland China as part of a package promising admission to U.S. political fundraising events and in some cases, a photograph with President Trump. Some invitations required attendees to provide passport information or other identification, likely in order to pass a U.S. Secret Service background check.
35. The available evidence indicates that Yang, Lou, Changchun, Yang, Yao, Jin, and John and/or Jane Doe are promoting fundraising events for U.S. political candidates and party committees to wealthy residents of mainland China and arranging for these foreign nationals to directly or indirectly make contributions through straw donors. Admission to these fundraising events is contingent on making a contribution, and the

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<sup>69</sup> Exhibit B.

<sup>70</sup> Kirchen, *supra* note 25.

<sup>71</sup> Lee, Narayanswamy & Li, *supra* note 29; *see also* Exhibit E.

<sup>72</sup> Lee, Narayanswamy & Li, *supra* note 29.

privilege to take a picture with President Trump is also contingent on making a contribution, often between \$25,000 and \$50,000. Given the number of political tourism package invites directed at Chinese nationals, and the routine participation by Chinese nationals in these fundraising events, the most plausible explanation is that U.S. nationals are being reimbursed for their contributions using some portion of the funds paid by Chinese nationals towards the packages, and that by organizing these events and arranging these contributions, there is reason to believe that Yang, Lou, Changchun, Yang, Yao, Jin, and John and/or Jane Doe violated 11 C.F.R. § 110.20(h)(1) by knowingly providing substantial assistance to foreign nationals in making such contributions.

**II. LI JING, JON DENG , HUI LIU, CINDY YANG, AND JOHN AND/OR JANE DOE VIOLATED THE STRAW DONOR BAN**

36. No person shall make a contribution in the name of another person, and no person shall knowingly allow their name to be used to make a contribution in the name of another person. 52 U.S.C. § 30122.
37. As described *supra* count I, the pattern of political tourism packages inviting Chinese nationals to U.S. fundraisers where admission and presidential photos are contingent on making a contribution, and Chinese nationals routinely receiving admission and presidential photos, provides reason to believe that U.S. nationals (John Doe and/or Jane Doe) are being reimbursed for their contributions using some portion of the funds paid by Chinese nationals towards the packages.
38. Additionally, the *Miami Herald* reported that Cindy Yang invited multiple “guests” to the December 2, 2017 Trump Victory fundraiser, none of whom appear in



Commission records as having contributed to Trump Victory in their own names.<sup>73</sup>

“However,” the *Herald* reported, “in the weeks before the event, Yang and three associates embarked on a flurry of giving to Trump Victory”:

Yang donated \$23,500 in three payments. Li Jing, a New York-based Chinese socialite who once told a Chinese-language magazine that there is “zero distance” between her and the Trumps, gave \$27,000. (The Asian GOP’s director said Jing had helped Yang recruit guests.)

Although one guest interviewed by the *Herald* said he got his ticket through Jing, she denied being a recruiter or fundraiser for the Asian GOP. She said any donation she made was for herself only and she could not recall contributing \$25,000, although she said she made two \$1,000 donations around that time.

Jon Deng, whom the Asian GOP website listed as director of its Palm Beach County chapter, and his wife donated \$85,000. Neither appears to have attended the event in New York.

Hui Liu said her husband, Deng, was traveling. Asked about the donations, she said: “I do not want to talk about that.” Deng did not return phone messages.<sup>74</sup>

39. Therefore, there is reason to believe that Jing, Deng, Liu, and/or other unknown persons (John Doe and/or Jane Doe) violated 52 U.S.C. § 30122 by “[g]iving money” to Trump Victory, “all or part of which was provided to” each individual by another person (*i.e.*, the true contributor(s)), without disclosing the true source of money at the time of making the contribution. *See* 11 C.F.R. § 110.4 (b)(2)(i). Based on published reports, there is reason to believe these individuals violated 52 U.S.C. § 30122 by “knowingly permit[ting their] name to be used to effect such a contribution.” 52 U.S.C. § 30122.
40. Additionally, based on published reports, there is reason to believe that the true source of those contributions, Cindy Yang and/or other unknown persons (John Doe

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<sup>73</sup> Albright, Blaskey, Ostroff & Nehamas, *supra* note 8.

<sup>74</sup> Blaskey, Nehamas & Ostroff, *supra* note 3.

and/or Jane Doe), violated 52 U.S.C. § 30122 by “[m]aking a contribution of money” to Trump Victory Fund “and attributing as the source of the money . . . another person” when in fact Yang and John Doe and/or Jane Doe were the true source of the funds.

**III. LI XIAOHUA, RYAN XU, AND OTHER FOREIGN NATIONALS VIOLATED THE BAN ON FOREIGN NATIONALS MAKING CONTRIBUTIONS**

41. There is reason to believe that Li Xiaohua, Ryan Xu, and potentially dozens of other apparent foreign nationals have indirectly made contributions to federal and local political committees, in violation of 52 U.S.C. § 30121.
42. As described *supra* Count I, given the pattern of political tourism packages inviting Chinese nationals to U.S. fundraisers where admission and presidential photos are contingent on making a contribution, and Chinese nationals routinely appearing at fundraising events and in pictures with the President, there is reason to believe that at least some foreign nationals indirectly made contributions in order to receive these privileges. For example, at a December 2, 2017 Trump Victory fundraiser in New York City, where an event organizer expressed concern “that some attendees might have funneled illegal donations through American straw donors,”<sup>75</sup> apparent foreign nationals Xiaohua and Xu appeared in photographs with the President, a privilege reserved for \$50,000 contributors.<sup>76</sup>
43. Therefore, based on published reports, there is reason to believe that Li Xiaohua, Ryan Xu, and other foreign nationals violated 52 U.S.C. § 30121(a)(1) by indirectly making contributions in connection with U.S. elections.

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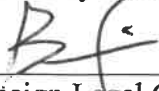
<sup>75</sup> Friedman, *supra* note 10.

<sup>76</sup> Blaskey, Nehamas & Ostroff, *supra* note 3; Lee, Narayanswamy, Rauhala & Denyer, *supra* note 2.

### PRAYER FOR RELIEF

44. As a result, there is reason to believe that organizers of these fundraising events (Li Juan “Cindy” Yang, Xinyue “Daniel” Lou, Sun Changchun, Jingzhu “Margaret” Yang, Jiusi Yao, Ma Jin, and/or John Doe, Jane Doe, and other persons) violated FECA’s prohibition on knowingly providing substantial assistance in the solicitation, making, acceptance or receipt of a foreign national’s contribution, 11 C.F.R. § 110.20(h)(1), and that U.S. nationals who allowed their name to be used to facilitate such contributions or other straw contributions (Li Jing, Jon Deng, Hui Liu, Cindy Yang, and/or John Doe, Jane Doe, and other persons), violated the straw donor ban, 52 U.S.C. § 30122, and that foreign national contributors (including Li Xiaohua and Ryan Xu) violated the ban on foreign nationals making contributions, 52 U.S.C. § 30121, and conduct an immediate investigation under 52 U.S.C. § 30109(a)(2).
45. Further, the Commission should seek appropriate sanctions for any and all violations, including civil penalties sufficient to deter future violations and an injunction prohibiting the respondents from any and all violations in the future, and should seek such additional remedies as are necessary and appropriate to ensure compliance with the FECA.

Respectfully submitted,



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Counsel to the Campaign Legal Center,  
Margaret Christ

May 22, 2019

# VERIFICATION

The complainants listed below hereby verify that the statements made in the attached Complaint are, upon their information and belief, true.

Sworn pursuant to 18 U.S.C. § 1001.



For Complainant Margaret Christ

A handwritten signature of Margaret Christ in cursive script.

Margaret Christ

Sworn to and subscribed before me this 22 day of May 2019.

A handwritten signature of the Notary Public, Moshe Zev Pasternak.

Notary Public



For Complainant Campaign Legal Center

A handwritten signature of Brendan M. Fischer in cursive script.

Brendan M. Fischer

Sworn to and subscribed before me this 22 day of May 2019.

A handwritten signature of the Notary Public, Moshe Zev Pasternak.

Notary Public

# EXHIBIT A



AmeriChina

185 articles

100,000 total reading

[View TA's article >](#)

[AxC invites] US President Trump invites you to participate in the Republican dinner - March 2, China's outstanding entrepreneurs leaders open a new path of Sino-US business cooperation

2018-02-11 01:47 entrepreneur



Since taking office, US President Donald Trump has paid special attention to the development of cooperation between China and the United States, and has given a certain degree of promotion and assistance.

In January 2017, Trump met with **Chinese entrepreneur Ma Yun** in New York , and Alibaba's share price rose immediately;

In June, Trump attended a national community leader dinner in Washington, DC, to meet with many Chinese entrepreneurs. Trump said at the dinner that " **very Chinese entrepreneurs are very welcome to invest in the United States**" ;

np approved **Foxconn** to build a manufacturing park in Wisconsin.

many people in the industry believe that meeting with President Trump ' help the company's international strategic development.

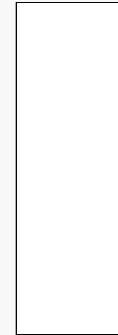


**Quip for Sale**

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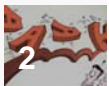
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TOYOTA



to



**AmeriChina** In order to help Chinese Entrepreneur leaders to open a new road of **China-US business cooperation** , carefully planned investment study tour of the high-end custom!

**We invite you to meet with US President Donald Trump for a dinner party** to gain an in-depth understanding of investment in the United States, the future development of the international economy, and talk about current affairs with the political and business elite, **and leave an exclusive commemorative photo** .

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**AmeriChina** sincerely for you

**Tailor-made** this high-end investment study tour

**Help you shape** high net worth individuals





to



Introduction to the event

US Republican Party Chairman **Ronald McDaniel** and Republican finance chairman **Todd • Ricketts** , cordially invite you to the American President **Donald Trump** have dinner, chat investment experience in the United States, plan to jointly invest in the United States, and can be obtained **with River President Vladimir photo separate** valuable opportunities.

One-on-one photo with President Trump



AmeriChina invites Chinese entrepreneur leaders who have a need for US investment to meet face-to-face with President Trump and introduce their investment plans and needs.

Sea Lake Manor, Palm Beach, Florida

March 2, 2018

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Host introduction

Rhone McDaniel

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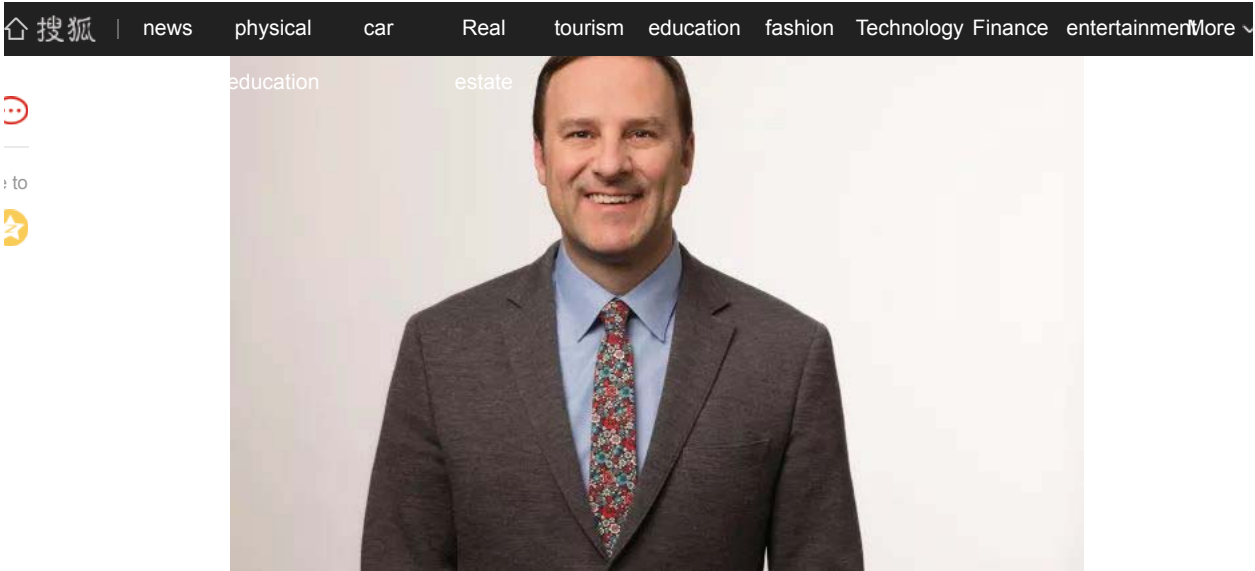


to



**Rhona McDaniel** , Chairman of the US Republican National Committee, former chairman of the Michigan Republican Committee. Rhona McDaniel is the third-generation politician of the family. She is the granddaughter of two Michigan governors and members of the Nixon government cabinet, George Romney, and the daughter of former Massachusetts Governor Mitt Romney. .

**Todd Ricketts**



**Todd Ricketts** , American businessman and politician, is the co-owner of the Chicago Cubs, a member of the board of directors of TD Ameritrade, and the current chairman of the Republican National Committee.

mouth

**schedule**

**Day 1** (March 1)

Arrive and stay at Palm Beach

**Day 2** (March 2)

Morning: Visit the scenery of Palm Beach

Afternoon: Preparation for the dinner

Evening: Participate in the dinner and **take a one-on-one photo with Trump**

**Day 3** (March 3)

Take the flight

mouth

**Travel service**

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Pick up and drop off the **whole limousine car service** and translation;

to

Dedicated to lead the **Trump dinner**



And have a special person to assist **with one-on-one photo with Trump** ;

**Upscale business package** (excluding airfare)



Palm Beach



Luxury car service

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➔ to

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mouth

**Contact information**

▾



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# EXHIBIT B

美国总统特朗普总统达拉斯晚宴

邀请函



RNC CHAIRWOMAN RONNA MCDANIEL

*and*

NATIONAL FINANCE CHAIRMAN TODD RICKETTS

*Cordially Invite You To An Evening With*

DONALD J. TRUMP

*President of the United States*

THURSDAY, MAY 31, 2018

*Dallas, Texas*

\*ADDITIONAL DETAILS AVAILABLE UPON RSVP\*



一、晚宴时间：2018 年 5 月 31 日

二、地点：美国得克萨斯州 达拉斯

5 月 31 日的会面，将在达拉斯举行，达拉斯是美国德克萨斯州第三大城市，美国第九大城市。1999 年，达拉斯被拉夫堡大学的全球化与世界级城市研究小组与网络列为第三类世界级城市，即小型世界级城市。市区大部分分布在充满绿色的小山

# EXHIBIT C





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# Buds | Inviting you to attend the luncheon of US President Trump

buds Buds <More

2018-06-12 11:19:31

# buds



Trump Luncheon

On June 29th, we will invite three Chinese entrepreneurs to visit the United States to attend the luncheon of US President Trump, when President Trump will attend the banquet in person. The luncheon is designed for business communication. You will meet face-to-face with President Trump to introduce business plans and needs, and in the discussion with business leaders, grasp the



广告



development trend of Sino-US economic and trade relations in advance, and at the same time promote individuals. Reputation and the creation of corporate IP images provide a good opportunity. In addition, you will receive a separate photo shoot with the President, photographed by a White House professional photographer. The event was co- chaired by US Republican President Ronald McDaniel , Finance Chairman Todd Ricketts and Wisconsin’s Finance Chairman Ted Kellner .



Donald Trump

The 45th president of the United States, commercial tycoon, politician, television celebrity and writer. Donald Trump is Chairman and President of the Trump Group and the founder of Trump Entertainment, graduated from the University of Pennsylvania. 2 016 Nian 11 9, to win the US presidential election. On January 20, 2017, he was sworn in.

Please enter a subtitle

details of the event





#### Details

- Time: noon on June 29
- Location: Milwaukee
- Total number of lunches: 80 people
- Chinese entrepreneur VIP quota: 3 people
- Form: Round Table Luncheon

#### stroke

- June 28th: Arrive in Milwaukee and attend the reception dinner
- June 29th: President Trump Luncheon
- June 30th: Leaving Milwaukee

#### material

- Hold a US visa or green card ( Chinese identity: passport of the person to be submitted, personal profile in Chinese and English, company profile; US identity: submit driver's license, social security number)

- Submit your passport and conduct a background review. Those who have a criminal record in the US will not be able to pass the review.

- After the background review is passed, you will receive an official invitation confirmation letter.

Please enter a subtitle

Host introduction



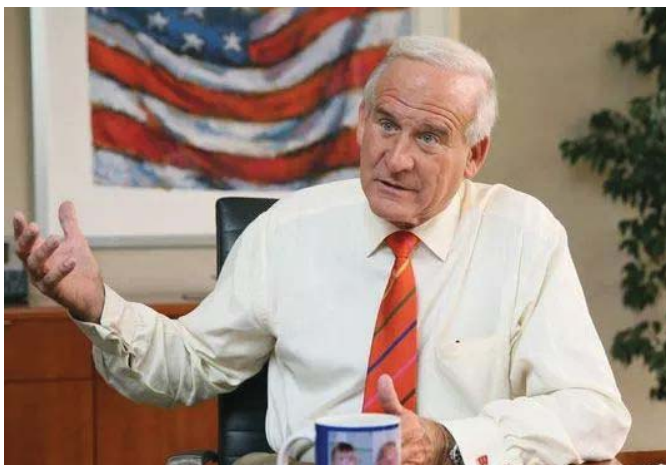
Ronna Romney McDaniel

Chairman of the US Republican National Committee, former chairman of the Michigan Republican Committee. Rhone McDaniel is the third-generation politician of the family. He is the granddaughter of two Michigan governors and members of the Nixon government cabinet, George Romney, and the niece of former Massachusetts Governor Mitt Romney.



Todd Ricketts

American businessman and politician, co-owner of the Chicago Cubs, a member of the board of directors of TD Ameritrade, is currently the finance chairman of the Republican National Committee. He has served in securities and investment companies. In 2013, he began to serve as one of the chairman and CEO of the US non-profit government advocacy organization "End Expenditure". In 2016, he was an important financier and sponsor of the Trump Electoral College; 2016 11 On the 30th, he was nominated by Trump as the Deputy Minister of Commerce.



Ted Kellner

American politician, currently the financial chairman of Wisconsin, USA. It and its family have long been loyal supporters of the University of Wisconsin, and have long and generously donated to the school.



Long press the QR code to contact buds for consultation and registration

Editor: Zeng Fanna

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Buddy founder Yao Jiusi

Forbes China's elite under the age of 30, the outstanding young people of the Davos Forum, graduated from the University of Pennsylvania



Sina Weibo: Yao Jiusi

WeChat public number: buds2016

Media cooperation: budsdesign@hotmail.com

This article comes from the Dafeng, only on behalf of the Dafeng from the media point of view.

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View all comments >>

# EXHIBIT D





## Invitation: The first US dollar Ivanka Trump invites you to a Lincoln dinner



Beijing Wake Inter...

Posted on 2018-01-13 17:40:03

[Complaint](#)

Reading number: 1697

2018-01-13 Bedroom Traveler Beijing Feile Sleeper

### Invitation card

Dear VIP:

Intimate contact with the United States in the first thousand gold; in-depth exchanges with members of the US Congress, thinking collision; together with top entrepreneurs to discuss the way of business; Trump top members private gathering, a total of gorgeous appointments...

Ivanka Trump's global meeting, I look forward to your visit!





## 伊万卡特朗普全球见面会



### Legendary female

"

When Trump was asked who was most dependent on the past year after being elected president of the United States, Trump first mentioned the name of daughter Ivanka.

Carl Icahn, a longtime friend of the Trump family and a famous Wall Street investor, said: "I think her father really is listening to her. I mean he respects her very much, not just because she is his daughter."

An insider on the Trump campaign team also told the New York Times that Ivanka "is one of the few people who can influence his ideas."

"

Ivanka Trump, the daughter of the Republican President of the United States, Ivanka Trump, a female entrepreneur who made Hilary admire, looks like a supermodel, but worked diligently.

**Ivanka Trump:** Born in New York, USA on October 30, 1981, world model supermodel and vice president of Trump Real Estate Group. He graduated from Wharton Business School and has been on the list of the world's top ten rich women in Forbes magazine for several consecutive years.

**Father:** Donald Trump, the Republican presidential candidate, the New York real estate king.

**Mother:** Ivana Trump was a famous Czech skier and was once a model, a New York socialist star.

**Husband:** Jared Kushner, graduated from Harvard University, received a JD and MBA from the Law School and Business School of New York University, and was the son of Charles Kushner, a large real estate developer.

**On March 6, 2018, the legendary female Ivanka Trump, waiting for you in Miami, USA.**

----- For more details, please consult your private overseas service consultant.

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# EXHIBIT E

Quickly grab the Trump breakfast invitation, the last few, we are just waiting for you!

From Ma Jin Denver Channel [Ma Jin Denver Channel](#) 3/1

Click on the top [blue word](#) ▲ attention subscribe to [Ma Jin Denver Channel](#)

Welcome to the circle of friends ❤️

♦ written in front

This is an invitation letter from US President Trump, from the world's only six-star diamond award private CLUB - Winter White House...

This may be the highest level invitation you have received at this stage of your life...

This is an opportunity that can be met and not sought, together to explore the most high-profile social circle in the United States...

### US President's Spring Breakfast Meeting

300 American political and business elites will gather at Haihu Manor



01

Haihu Manor





In June 2019, US President Trump will hold a presidential breakfast meeting at Haihu Manor. Hongji Group is fortunate to receive an invitation letter for this event. You are now invited to join the United States to participate in this event and experience the elite of the top American circles. Life, with the political and business elite to drink wine, and Trump intimate photo, the itinerary must be wonderful.

Why did Trump choose to host so many banquets at Haihu Manor?

Why is Haihu Manor called "Winter White House"?

Xiaobian takes you to find out



Haihu Manor was listed in the list of historic buildings in the United States as early as 1980.

Mar-a-Lago is located in Palm Beach, Florida, USA - the premier destination for American high-class vacations. In addition to the wealthy wealthy, many political and other celebrities are frequent visitors. The Haihu Manor is the most luxurious mansion in the prime location of Palm Beach, known as the "Gem of the Crown" in Palm Beach. People familiar with Trump say that the status of Haihu Manor in his heart is just as important as his Trump Tower in New York, where he is more likely to interact with people he likes more casually.



The Haihu Manor surrounded by palm trees has 126 rooms, including 58 bedrooms and 33 bathrooms. There is also a 1900 square meter ballroom and three bomb shelters. Outdoor tennis courts, swimming pools, golf courses, etc., as well as entertainment facilities such as a hair salon, cinema and chess room.





This lavish manor has been in Palm Beach for 90 years, and its builder is Maholly Post, the heiress of the Potter family of General Foods' "Oatmeal King." Gold lamps are set with colorful gemstones, gold foil in the living room, and 16th-century Flemish tapestries. The restaurant is decorated with precious murals... it is the ultimate dream of all the top richest people in private palaces. luxurious. Comfortable. huge.

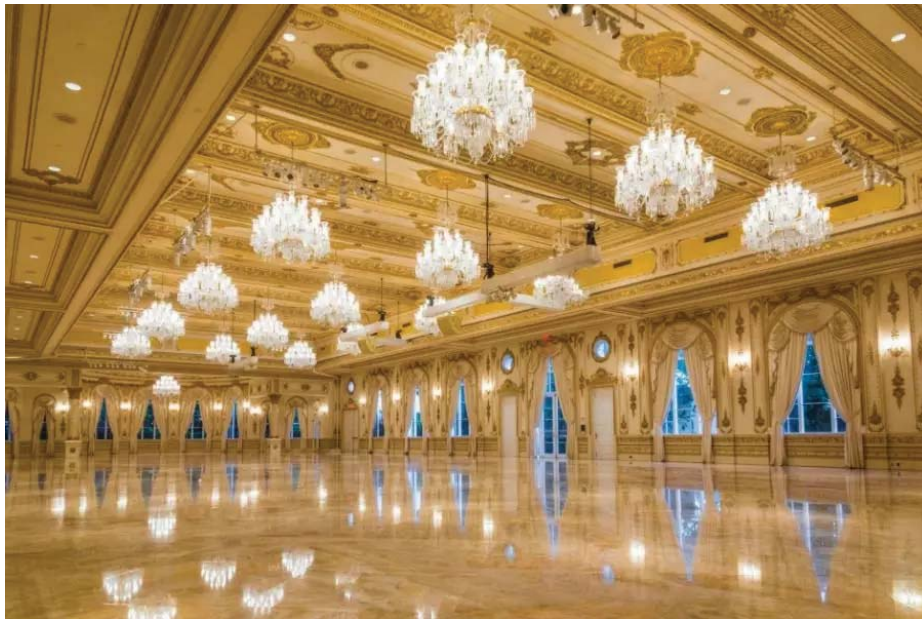




In 1973, when Mahalli died, he donated the Haihu Manor to the US federal government, hoping it would become the president's winter palace. However, President Nixon and later Jimmy Carter felt that they could not control this extravagance. They were unwilling to come here, and the annual maintenance cost and tax burden of up to \$3 million was too heavy, so the US government returned the manor. This luxury estate, which even the US government could not afford, was bought by the wealthy real estate agent Trump in 1985. What is unexpected is that the local tyrant Trump who only makes a house to make big money will actually Became the president of the United States, and Haihu Manor has finally become a veritable "presidential palace."



The savvy businessman Trump is clearly more aware of the value and charm of the Haihu Manor. In addition to the luxury living of the family, he established the Haihu Club, often holding concerts and concerts in the manor, and even hosted beauty contests. The members of the club are not rich and expensive, and the membership fee is not affordable for the average person. The \$200,000 "starts". Today, the club has 500 members, and there are restrictions on the number of new places each year, only accepting 20 or 30 people.



Haihu Manor not only looks beautiful and luxurious, but also has a literary style. Many big-name stars like it. The 1900-square-meter grand ballroom in the manor is the place where Trump and his current wife Melana hold a wedding. In 1994, Michael Jackson and Elvis Presley, the daughter of Elvis Presley, had a honeymoon at Haihu Manor. Celine Dion, Billy Joel and other singers have held concerts here, and the annual International Red Cross annual dance party is held here. Various banquets, evening parties and concerts take turns.



In 2016, Trump was elected president of the United States. After he became president, he hosted foreign leaders, company executives and other guests here. Haihu Manor became a sub-center of the US government, known as the "Southern White House", also known as the "Winter White House", nowadays the sea lake As early as the Sea Lake

Club, the manor formed an upper elite circle, which shows its important role in Trump's internal affairs.



## Brief introduction



TRUMP  
PENCE  
\*\*\*  
VICTORY



弘基集团  
HGGT LIMITED

RNC CHAIRWOMAN RONNA MCDANIEL  
AND  
NATIONAL FINANCE CHAIRMAN TODD RICKETTS  
CORDIALLY INVITE YOU TO A  
BREAKFAST RECEPTION  
WITH



PRESIDENT OF THE UNITED STATES

DONALD J. TRUMP

★ 海湖庄园早餐会 ★  
2019年6月

NO.1 与特朗普总统合影套餐

\$70000

\* 包含三天二晚4星酒店机场接送, 本地游全程吃住行安排, 不包括往返机票。

NO.2 普通出席套餐

\$15000

\* 包含三天二晚4星酒店机场接送, 本地游全程吃住行安排, 不包括往返机票。

**Time** : June 2019

**Location** : Mar-a-lago, Palm Beach, Florida

**Event** : President Trump Breakfast



**Participants** : American political and business celebrities, including super rich billionaires, members of parliament, white house officials, etc.

**Other participants :**

Republican Chairman: Ronna McDaniel

Florida Senator: Rick Scott

Governor of Florida: Ron Sandys

**Highlights of the event :**

1. Exclusively arrange the entire experience of Trump to entertain the leaders and routes of the Tian Dynasty leaders
2. At the Trump breakfast meeting, listen to Trump's speech at the scene. The number of participants in the breakfast meeting is no more than 300.
3. Can take small video photos, etc., can be taken with the scene celebrity dignitaries
4. Includes 2 nights accommodation
5. A green card or citizen can take a photo with President Trump

**Activity itinerary :**

Day 1 - Arrive in Palm Beach, Florida, arrange pick up

Day 2 - Participate in the breakfast meeting of President Trump at Haihu Mountain Villa

Day 3 - Leaving Florida



# 特朗普总统 ▶ 海湖庄园 早餐会邀请函

参加对象：美国政商界名流，包括超级富豪亿万富翁、国会议员、白宫官员等

其他参会嘉宾：  
共和党主席：Ronna McDaniel  
佛罗里达参议员：Rick Scott  
佛罗里达州长：罗恩德桑蒂斯



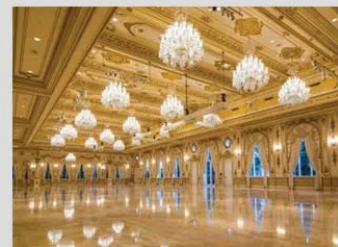
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## 早餐会精彩内容：

1. 全程独家安排体验特朗普招待天朝领导人场所及路线
2. 参加特朗普早餐会，现场聆听特朗普演讲，早餐会参会人数不超过300人
3. 可拍摄小视频照片等，可与现场名人政要合影
4. 包括两晚住宿
5. 特朗普总统合影



特朗普总统合影套餐 USD 70000



普通出席套餐 USD15000

Day is morning, and outstanding Chinese entrepreneurs participate Stuttgart Trump presidential breakfast, break time and space constraints; updated regularly and continuously synchronize the forefront of overseas business thinking, is to create a comprehensive learning environment, the more you small series Select the following value-added projects and invite you to make progress together and strive to help you.

1, **2019 Buffett Shareholders Meeting and US Asset Allocation Investment Investigation Project, invites you to go to Buffett to invest in art feast**

# 2019股东大会

# 巴菲特

Warren Buffett

- 朝圣股神巴菲特震撼现场
- 尊享奥巴马定制商务考察
- 私密VIP尊享团，漫步第五大道
- 深度探访摩根士丹利，华美银行、联合国…
- 游览大都会艺术博物馆，登高地标帝国大厦…
- 体验美式生活，探讨美式教育理念

—— 奥巴马-纽约 ——

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## 2, 2019 South African Studies + South African Wildlife Conservation Ambassador Recruitment





出发日期: 2019.7.20

# 2019亲子研学 + 南非野生动物保护大使

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 承办单位: 弘基财商学院  
 路有户外俱乐部、南非野生动物保护区



### 3, Singapore Talent Invitation Program, become our financial venture partner, free to own Singapore identity



### 4, CWMA International Certification Wealth Management Seminar Admissions Project

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- 财富管理规划；
- 金融市场与投资工具；
- 投资理财角度看宏观经济与政策；
- 投资理财角度看财务管理与税务筹划；
- 个人保险规划与决策购买；
- 高端客户的顾问式行销；
- 财富管理顾问前瞻——领导艺术

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香港及内地知名金融分析师、  
北京大学EMBA总裁班特聘讲师、  
悉尼大学金融高级研修班特聘教授  
国家高级理财规划师

**李教授**  
南洋理工大学数学专业本科  
哥伦比亚大学统计学硕士学位  
耶鲁大学运筹学/管理科学硕士学位  
哈佛大学经济学博士学位  
任教于斯坦福大学、马里兰大学、  
伯克利加州大学

**钱教授**  
新加坡管理大学经济管理学院  
经济学讲席教授 博士生导师  
原新加坡大华银行基金经理  
美国哈佛大学经济学博士

课程时间：2019年4月5日至2019年4月9日  
课程地点：新加坡  
课程费用：15800元  
(含新加坡期间的住宿、规定行程用车、  
培训资料费、考试费、认证费、部分  
餐食费用及参观导游费用)



关国哈佛大学经济学博士  
原新加坡大华银行基金经理  
美国哈佛大学经济学博士

willam Lee  
南洋理工大学商学院客座教授  
瑞银UBS亚太区客户经理  
新加坡财商联合会协会副主席

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# CWMA

## 关于CWMA 国际认证财富管理师

CWMA证书是目前世界“管理财富”培训认证中的黄金证书之一，CWMA注重营销使用技能，信息交流和实务，因此受众更加广阔。调查有关显示，在美国、香港以及新加坡银行从业人员中，CWMA证书持有者的比例最高。CWMA进入新加坡以来，迅速得到众多机构认同，并且与新加坡成为战略伙伴关系，目前CWMA在世界范围内拥有近万名会员，且会员皆来自世界五百强金融机构。

主办单位：新加坡财商联合会（SFG）  
协办单位：弘基财商学院  
新加坡DBS金融机构  
新加坡法国安盛集团

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For more exciting events, please post the link below:

[Inviting you to go to North America: 2019 Buffett Shareholders' Meeting is now accepting registration, the best investment is yourself](#)

[\[Fly to South, to South Africa\] 2019 South African Studies + South African Wildlife Conservation Ambassador Recruitment Guide](#)

[\[Hongji New Spring Koi\] Come, free to have Singapore identity, the luckiest person is actually you!](#)

[The world will envy you, have Singapore identity for free, the strongest passport on the surface](#)

**The number of places is limited, the registration is fast, and the early bird forecast name has more surprises! Quickly stamp the QR code below!**

— END —

**Ma Jin Nuggets Channel, work together to achieve wealth freedom**



Public ID: Ma Jin Nuggets Channel

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receive  
iPhone Xs Max



# EXHIBIT F

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# Invitation from Trump: The US Presidential Inauguration Ceremony is waiting for you to witness the important moments of the United States and enjoy the art capital of New York!

2016-12-22 14:34New United States / York



Clinton said to Clinton before going out:

"Tonight, the two presidents are sleeping together."

Hillary arrived home at night.

Clinton: "Is Trump coming or am I going?"



The in full swing of the US presidential election finally has results

This election has attracted the attention of the whole world.

The next most important ceremony in the United States is of course

45th President - Donald Trump's inauguration

24-hour hot text

大家都在搜

1 The fact that the ancie did his wife and was to 66,0

2 Forget Wuzhizhou Isla are the most worthwhil 30

3 ※Traveling small dictio ※You may not know th 13,0

This domestically unpc island is beautiful, not 33,0

The world's first quality once severely exclude 17,0

Popular



Once again being a foreign aid pit! CBA pseudo-domin

The woman has long hair h ere, and she has a lifetime

Before the end of his deat h, Chairman Mao handed

The most venomous invent ion in history is specifically

货到付款

这鞋太牛了 没穿过这么好的鞋

24-hour hot text

1 The first iconic landscape of Gulangyu Island in Xiamen is 66,000 reading

2 The sexy portrait of the eye-catching photographer under 3073 reading

3 ※Traveling small dictionary ※You may not know these 13,000 reading



0

share to



On January 20th, 2017 , we invite you to participate in the unique presidential inauguration ceremony, to observe the presidential inauguration ceremony and witness the swearing-in ceremony of the 45th President of the United States in the Capitol.



Island is beautiful, not to lose to

### 24-hour hot text

1 The fact that the ancient did his wife and was to 66,0

2 Forget Wuzhizhou Island are the most worthwhile 30

3 ※Traveling small dictionary  
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This domestically unpopular island is beautiful, not 33,0

The world's first quality once severely excluded 17,0

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▲ The stage where Trump's inaugural speech is under construction

**US Presidential Inauguration Ceremony**

The inauguration of the US president marked the beginning of the term of the new US president. The traditional project of the inauguration ceremony has also gradually expanded, from the initial simple inauguration ceremony to a one-day event including parades, speeches and dances.



24-hour hot text

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share to



On the day of the oath, known as the **Inauguration Day** , it is a public holiday in the United States. From 1793 to 1933, it was March 4, and after 1933, the inauguration day was January 20.

## 24-hour hot text

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24-hour hot text

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▲ Presidential Inauguration Ceremony of 2009

CNN received a copy of the 58th Presidential Inaugural Committee Funder's Welfare Handbook, which showed that the donor's donation of \$ 1 million would receive a lunch coupon with the cabinet nominee and congressional leader, and the vice president and vice president. Tickets for the lady's dinner voucher, lunch coupon with the first family, tickets for the "Grand Candlelight Dinner" attended by Mrs. Trang's Lady and Burns, and admission tickets for the inaugural parade, the swearing ceremony and the inaugural ball.

The following are the basic contents of different packages -

- \$1 million and above

fourZhang and the cabinet's appointed staff and congressional leaders' "Leader Luncheon" coupon

Four tickets to the "Intimate Dinner" of the Vice President Peng Sis

Eight "Ms. Luncheon" coupons for women members of the first family in the future

Eight "Candlelight Dinner" coupons, when Trump, his wife Melaniya and Burns will attend

0

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ball and a "entertainment" welcome reception

Eight Trump inauguration vouchers



\$500,000 to \$99.99 million

Two Vice Presidential Dinner Coupons

Four "Ms. Luncheon" and "Candlelight Dinner" coupons

Four VIP coupons, including inaugural parades, concerts, fireworks displays, inaugural dances, and an "entertainment" welcome reception

Four Trump sworn in as a ceremony ticket



\$250,000 to \$499.99 million

Two "Ms. Luncheon" and "Candlelight Dinner" coupons

Four VIP coupons, including inaugural parades, concerts, fireworks displays and an "entertainment" welcome reception

Two inaugural ball tickets

24-hour hot text



The fact that the ancie  
did his wife and was to  
66,0



Forget Wuzhizhou Isla  
are the most worthwhil  
30



※Traveling small dictio  
※You may not know th  
13,0






This domestically unpo  
island is beautiful, not  
33,0



The world's first quality  
once severely exclude  
17,0

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▲ The picture above shows Obama and his wife at the inaugural ball

- \$100,000 to \$249,900
- Two

tickets for "close policy discussion" with the appointed cabinet members during dinner
- Four

VIP coupons, including inaugural parades, concerts, fireworks displays and an "entertainment" welcome reception
- Two

inaugural ball tickets
- Two

Trump inauguration vouchers



- 25,000 to 99,000 US dollars
- Four coupons

, using the range, including the inaugural tour line, concerts, fireworks, inaugural balls and a "full of entertainment" welcome reception
- Two

Trump inauguration vouchers



0

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Departure date : January 19, 2017

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Private trip

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the luxury shopping on Five Avenues.

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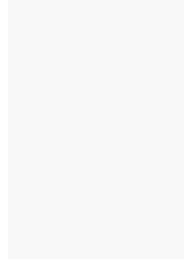
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This domestically unpo  
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33,0

The world's first quality  
once severely exclude  
17,0



Heavy | Chengdu Green Road into “Net Red” Luo Qiang’s on-site office gave “Gold Ideas” to promote the construction of Jincheng Greenway

 Butterfly wings · Today 10:23



Already in the end

24-hour hot text



The fact that the ancie  
did his wife and was to  
66,0



Forget Wuzhizhou Isla  
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30



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# EXHIBIT G



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## [ILSclub exclusive VVIP invitation] Trump invites you to join the US President's Golden Autumn Dinner

2017-07-11 17:39

Trump



I love learning club

He was the first US president to be abandoned by the mainstream media and was able to win. The first president who was denied by all the elites in his party could still win the campaign. The campaign funds were far behind, and they did not invest a lot of money. The President of the United States, a US president who was almost predicted to fail by all major polls and was also elected, was condemned by most entertainment stars and won the US president. He was the first to write Twitter English slag can see Understand the President of the United States, and foreign teachers do not necessarily give you a living example of teaching English... The most inspirational person in the world! Many people on the Internet also said that he was the first man in human history to quarrel with a woman. He is Trump! !



It is said that Trump is a businessman politician and some people do not recognize it, but the objective fact is that he is a businessman politician, which is very different from the pure politicians of the Democratic Party and the Republican Party. If you pay attention,

### 24-hour hot text

大家



The fact that the ancient eunuchs did his wife and was too cruel  
5.9 million reading

Po



Gold commented on the world Fei Jin to discuss social security  
40,000 reading



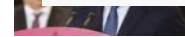
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货到付款



这鞋太牛了  
没穿过这么好的鞋

### 24-hour hot text



In March, the transaction volume of second-hand houses  
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If the financial crisis comes, which one is more dangerous in  
7940 reading



Betting on the "big insurance" listing insurance life insurance  
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Do you want to be a guest at the White House? Do you want to dine with a number of US national senators, parliamentarians, politicians, celebrities? Want to work with his daughter Ivanka? Do you want to have dinner with Trump's popular White House cabinet members? Do you want to be the second Chinese to talk to him after Ma Yun? Nothing is impossible..., the opportunity is coming, I love learning clubs. The US chapter has good news. The club has a VVVIP opportunity to let you know Trump, the exclusive domestic channel, the deadline for registration on July 29, crazy roaming What are you waiting for! !

theme

US President's Golden Autumn Dinner

Organizer

Organizer

American Republican Conference

Exclusive domestic co-organizer

I love learning club

time

October 1 - 4, 2017

Activity planning

24-hour hot text

- The fact that the ancient eun... did his wife and was too crue... 5.9 million rea
- Gold commented on the worl... Fei Jin to discuss social secu... 40,000 rea
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**October 1st :** Arrive in Washington, stay at the President Hotel, 400 meters from the White House: Trump International Hotel;

The hotel was transformed from the original classical architectural post office in Washington. It is the second tallest building in the US Capital Territory. It is elegant and brilliant, and has special significance.

**October 2nd :** Visit the White House in the morning;

At noon, a welcome luncheon was held at the Capital Hill Club (the top high-end club in Washington, DC); a number of US national senators, parliamentarians, and celebrities attended the luncheon;

In the afternoon, attend the VIP reception of the President's Golden Autumn Dinner, accept the meeting of US President Trump, as well as a number of cabinet ministers and politicians, one-on-one conversations, and a chance to take photos with the President. (Confirmed before the event is January.)

In the evening, attending the dinner of the president's speech, and the American celebrities, gathered together and gathered together.

**October 3rd :** Special breakfast/lunch with morning/noon and White House cabinet

Afternoon - Meeting with Ms. Ivanka

**October 4th :** Leaving Washington

**cost**

**Participate in Trump Presidential Activities:** \$205,000/person

24-hour hot text

1

The fact that the ancient eun did his wife and was too crue

5.9 million rea

2

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40,000 rea

3

The three generations of the grandson and the grandson

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If the financial crisis comes, which one is more dangerous

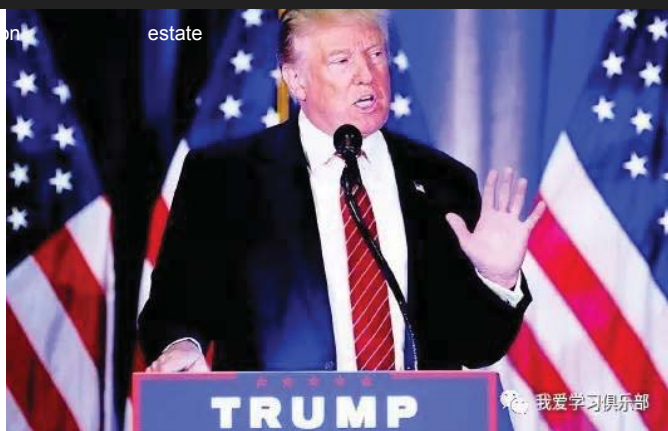
7940 rea

Betting on the "big insurance listing insurance life insuranc

3712 rea

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**Participate in the Ivanka meeting** : 45,000 US dollars / person, no more than 20 people



## 24-hour hot text



1 The fact that the ancient eunuch did his wife and was too cruel  
5.9 million reads



2 Gold commented on the world Fei Jin to discuss social security  
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3 The three generations of the grandson and the grandson  
18,000 reads



4 If the financial crisis comes, which one is more dangerous  
7940 reads



5 Betting on the "big insurance" listing insurance life insurance  
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1, the price does not include: China and the United States round-trip ticket

2. Prices include: 4 days and 3 nights hotel single room; October 2nd White House visit, Capitol Hill Club welcome luncheon and Senator meeting, President VIP reception, dinner; October 3 Cabinet Breakfast/Lunch, Ivanka meeting.

### sign-up process

Submit application materials at the end of July; preliminary review is appropriate, 80% deposit will be submitted before August 5th to ensure location; 9

The full payment will be confirmed by the 1st of the month. If you cannot participate for personal reasons, you cannot arrange a refund. Please arrange your time reasonably.

### Deposit instructions

To participate in Trump's presidential activities, you need to pay 80% of the US dollar deposit to ensure the location; to participate in the Trump activities and participate in the Ivanka activities, you need to deliver 85% of the deposit.

### ways of registration

#### 1. Information requirements:



0

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(2) E-mail : Send e-mail title to esuya315@126.com: "Name + company + position + phone + Trump dinner registration", the content of the e-mail is the audit information, and then the staff contact.

payment method

Remittance payment : ICBC: 6222020200062285909, account name: Zhao Weizhen, bank: Beijing Shijingshan octagonal north branch, remarks: "name + Trump registration."

Contact

Teacher Zhao : 13911385040

Trump Introduction

Donald Trump was born in New York on June 14, 1946. He is a Republican politician, entrepreneur, businessman, and the 45th President of the United States.



After graduating from the Wharton School of the University of Pennsylvania in 1968, he entered his father's real estate company and began to run the company in 1971, officially entering the business community. In the following decades, Trump began to establish his own real estate kingdom, known as the "king of real estate." In addition to real estate, Trump extends its investment to other industries, including casinos and golf courses. He is also involved in the entertainment industry. He is the host of TV shows such as the American Celebrity Apprentice Apprentice and serves as the chairman of the Miss Universe beauty pageant. The American magazine Forbes has estimated Trump's net worth of about \$4.5 billion, and Trump claims more than \$10 billion.



Trump has supported the Republican and Democratic main presidential candidates in the past 20 years. In June 2015, Trump officially participated in the 2016 US presidential

24-hour hot text

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On November 9, 2016, Donald Trump has won 276 electoral votes, more than 270 electoral votes, and was elected the 45th president of the United States.

At noon on January 20, 2017, Trump was sworn in in Washington, DC, and officially became the 45th president of the United States.

I love studying club overseas study department

July 10, 2017

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

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24-hour hot text

1



The fact that the ancient eun did his wife and was too crue

5.9 million read

2



Gold commented on the worl Fei Jin to discuss social secu

40,000 read

3



The three generations of the grandson and the grandson

18,000 read



If the financial crisis comes, which one is more dangerous

7940 read



Betting on the "big insurance listing insurance life insuranc

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ofo的“一切正常”都活在声明里

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财经观察报 · 今天 07:13

“润芝堂”产品畅销全球, 创始人李汉德原来是个“毛泽东迷”!

大湾区发布 · 今天 09:54

看穿个股期权诈骗的真面目, 受骗后该如何维权

华轩挚信 · 今天 02:12

商业时报 · 03-31 21:50

第一财经 · 今天 10:04

政商参阅 · 今天 11:30

财经ABC · 今天 04:46

财经头条精选 · 今天 08:17

FX678 · 昨天 21:01

有道热点 · 昨天 23:28

商客白华 · 昨天 08:44

新京报 · 今天 09:17

小白读财经 · 昨天 22:00

华商韬略官方账号 · 今天 04:25

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Finance

entertainment

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sohu.com

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偷见财经

今天 00:08

搜狐

sohu.com

绿城服务：已与杭州“保姆纵火案”受害人家属达成和解

地产深度报道

今天 10:21

搜狐

sohu.com

一大波新股民狂奔入场！3月深市新增开户数近300万 环比翻倍

华尔街见闻

今天 10:02

搜狐

sohu.com

苹果向高通、三星买5G芯片遭拒 三星称因“产能不足”

中金网

今天 00:02

搜狐

sohu.com

期货投资诈骗越来越多，被骗了能追回么？

华轩挚信

昨天 02:47

搜狐

sohu.com

当舞蹈老师存下70万，买套房子几年赚回700万，今拥有几百套豪宅

担扑

今天 03:35

搜狐

sohu.com

好消息，5月1号起，社保费率降至16%、养老金上涨5%、医保报销比例提高10%！

Xiao Ai to work

03-26 20:54

搜狐

sohu.com

The property market will not warm up, so that housing prices will pick up

Beijing Youth Daily

Yesterday 17:01

Already in the end

24-hour hot text

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# EXHIBIT H



Home

health

Food

fashion

Fortune

entertainment

tourism

Anime

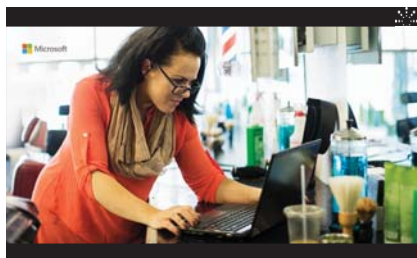
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International

## US Presidential Private Estate Presidential Meeting Dinner Invitation

2018/01/26 Source: Yue Yuan

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# You are Invited!



## The Mar-a-Lago Club

1100 South Ocean Blvd  
Palm Beach, Florida 33480  
Sunday, February 25<sup>th</sup> 2018  
5:30 pm – 9:30pm  
Black Tie

## 雷射減脂讓厚片變薄啦！

掰掰袖、大腿肉完美退散♥雕琢曲線  
就找【楊氏羅丹·雷射減脂】還妳最初的美麗

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說這專頁讀

2.6 萬 按讚次數

成為朋友中第一個說這讀的人

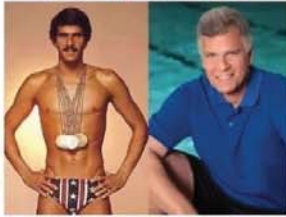


*By Invitation Only***Honored Guests****Danny Ayalon, Honoree**

Danny Ayalon is the former Israeli Ambassador to the United States 2002-2006. He also served as Deputy Foreign Minister and as a member of the Knesset. Both his parents were in the military in the 1948 War of Independence, & his father fought in the Golani Brigade. "Truth About Israel" is a not-for-profit with the fervent mission to spread that message of THE IRON DOME OF TRUTH on a worldwide platform, advocating for Israel and disseminating the true facts and benefits for humanity which have their origins in the Jewish State. Ambassador Ayalon's organization grooms future diplomats and "ambassadors of good will", and prepares students and business leaders to educate others as to Israel's invaluable place in today's world. And using social media & other resources, Israel is promoted throughout the international community.

**Elayne Flamm, Honorary Chairperson**

Elayne Flamm's dedication to Israel extends over decades and countless philanthropic endeavors. As National President for Friends of Akim USA, she was honored in 2009 for her achievements as "Fundraiser of the Year" by Israel President Shimon Peres. Ambassador Danny Ayalon was a Keynote Speaker at one of the many Palm Beach Galas she orchestrated for AKIM. Spanning over 16 years, her work with AKIM has made a "game-changing" difference in countless lives of the physically and mentally disabled with programs, housing, employment and proud military service. She served as Chairman of the Manhattan Division of Israel Bonds in the 1980's, and her current nonprofit involvement extends to participation with the International Society of Palm Beach, Israel Bonds, Israel Cancer Association USA and her role as President of the Advisory Board of Jezreel International. Ms. Flamm started out in the performing arts and changed gears with her devotion to causes for Israel, where she also has a home. She attributes her fundraising success to her devotion to God, advising younger women entering the workforce to keep their eyes on God as they seek professional advancement. She cites her late husband, Donald Flamm, the inspiration behind the Voice of America, as a motivator in her accomplishments, as well as her cherished children and grandchildren.

**Mark Spitz, Special Guest**

On September 5<sup>th</sup>, 1972, six members of an Arab terrorist group known as Black September dressed in Olympic sweat suits and murdered eleven Israel athletes. The Jewish Olympic hero in Munich that day will deliver his compelling presentation. On that day Mark was surrounded by US Marines and went on to win 7 gold medals and set 7 world records at that Olympics. His records held until 2008! Over the life of his career, he won 9 Olympic golds, 5 Pan American Golds, 31 AAU and 8 NCAA titles. He set World Records 35 times.

**Congressman Ron DeSantis**

Congressman Ron DeSantis, a former JAG officer, Harvard Law, & Yale undergraduate was promoted to Lieutenant & worked as JTF-GTMO with the Guantanamo Bay detainees. In 2007, he was assigned to Seal Team One & deployed to Iraq. In 2008, he was appointed by the US DOJ as a Federal Prosecutor. He has been awarded the Bronze Star Medal & the Iraq Campaign Medal.

**Congressman Brian Mast**

Congressman Brian Mast was a part of Operation Enduring Freedom where he stepped on an improvised explosive device in Kandahar & lost both his legs. He was a volunteer in the Israel Defense Forces, awarded the Bronze Star Purple Heart, Defense Meritorious Service Medal, and the Army Commendation Medal.

**Congresswoman Claudia Tenney**

Congresswoman Tenney is an ardent supporter of both Israel & our Veterans. On June 9<sup>th</sup>, Representatives Claudia Tenney and Brad Schneider announced the introduction of new bipartisan legislation to strengthen the processes that ensure Israel's qualitative military edge over regional adversaries. On June 20<sup>th</sup>, Congresswoman Claudia Tenney announced that the Veterans Affairs and Related Agencies

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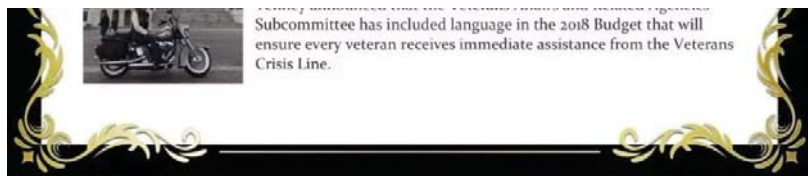
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2.6 萬 按讚次數

[成為朋友中第一個說這讚的人](#)



Dinner time

First, dinner time

February 25, 2018

location

Second, the location

President Trump Private Estate, Florida, USA - Mara Lago



Introduction

Introduction to Trump Presidential Private Estate Mar a Lago

The Mar a Lago Club is owned and operated by US President Donald Trump. Mar a Lago is the only private club in the world to receive the 6-Star Diamond Award from the Academy of Hospitality Management. It is an invitational and membership system. It is considered to be the most sought-after private club in the world and is called "Trump Winter White House" by the world.



64 Vintage Moments From History Caught On Camera

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Attendant

Third, important attendees

President of the United States: Donald Trump

US House of Representatives: Rong De Santis

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2.6 萬 按讚次數

成為朋友中第一個說這讀的人

US House of Representatives: Claudia Turney

Former US Ambassador to the United States and 9 Olympic Gold Medal Winners: Mark Spitz

Waiting for political and business celebrities, more than 200 top entrepreneurs in the world

All male guests are required to enter the suit + bow tie, female guests evening dress! The seat is VVIP, the best seat for this event! Just a few meters away from the presidential speech! (only ten places)



Itinerary plan

Fourth, the itinerary

Precise theme tour of the presidential dinner

| 时间                       | 行程安排   | 地点                       |
|--------------------------|--|--------------------------|
| 2018/02/24               | 成员从国内乘坐飞机到达美国佛罗里达州   | 美国佛罗里达                   |
| 2018/02/25<br>(上午下午自由活动) | 参观棕榈滩：了解历史、人文、美食及购物。<br>备注：棕榈滩是属于美国佛罗里达州东南部的旅游城镇，在美国一直扮演着超级富有的角色，因为这里是美国最有名的亿万富豪区，这里也是美国亿万富豪的度假胜地，每年都有吸引美国乃至世界各地超级富豪到此度假，因此棕榈滩的旅游业相当发达。棕榈滩也是美国豪宅价格最高的地区之一，平均豪宅价格超过4900万美元。 | 美国<br>佛罗里达<br>棕榈滩        |
| 2018/02/25<br>(晚上)       | 晚上由专人陪同前往总统海湖庄园参加晚宴活动。   | 美国<br>佛罗里达 棕榈滩<br>总统海湖庄园 |
| 2018/02/26               | 飞机返回祖国，结束终生难忘的总统晚宴之旅   | 返回祖国                     |

Charge Details

Five, the cost details

Only attend the presidential dinner

RMB 88,000 (no photo, including pick-up and one-night hotel)

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Q

雷射減脂讓厚片變薄  
啦！

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就找【楊氏羅丹·雷射減脂】還妳最  
初的美麗

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說這專頁讚 2.6 萬 按讚次數

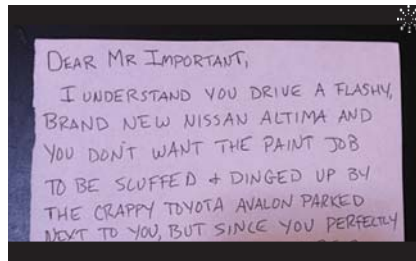
成為朋友中第一個說這讚的人



The VVIP seat of the Presidential Dinner is a one-on-one photo with President Trump.

The total cost is 380,000 yuan

● Pick up



**Hilarious Windshield Notes Left Drivers Laughing**

Sponsored by NinjaJournalist

- One night 5-star hotel single room
- Three meals a day
- Driver costs
- Guide fee
- Translation fee

#### application process

#### Six, the application process

- Provide the participant's name, telephone number, personal and company profile in English and Chinese, ID card, passport page and visa page scanned documents (requires security review)
- Ten places, first come first served

US President Donald Trump held a private estate dinner on February 25 at his private mansion, Haihu Villa.

All the attendees were top political figures and celebrities.

Intimate communication, one-on-one photo taking.

Open only 10 tables for Chinese entrepreneurs , first come first served!

Because this event is a charity dinner,

So the photo with the president is lower than the regular price!

The identity needs to be reviewed, and interested entrepreneurs please reply.

#### ▼ scan code consultation ▼

Telephone number 13903119778

#### ▼ Previous selection ▼



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### Olivia Newton-John Remarried At 59

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idollady 2018.01.24 | 普通大衣靠边站，2018双排扣大衣才最值得买！



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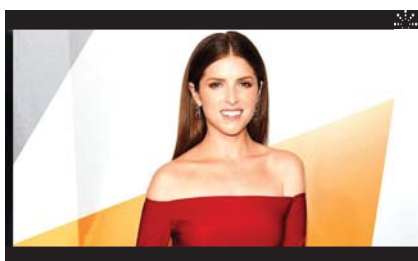
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### Anna Kendrick's Inspirational Transformation

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#### you might be interested

- The ultra-luxury private manor covering an area of more than 100,000 square meters has become the most popular destination this week.
- These two days, this place is destined to attract the attention of the world!
- What is the story behind the Henan guys attending the Trump dinner? Face-to-face dialogue
- The meeting of the Haihu Manor is an opportunity for the Chinese dollar to develop personal relationships.
- Why did the Trump Sea Lake Manor, where Michael Jackson lived, mixed into the swindler hype?

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- Xi Jinping and his wife Peng Liyuan attended the welcome dinner hosted by US President Trump and his wife Melaniya
- 1653 yuan to live in the "Winter White House", see Trump, about?
- What are the little-known past events of Haihu Manor, where the US dollar first met?
- Secret | The \$8 million Haihu Manor is valued at 250 million! What are the secrets of Trump's "Private White House"?
- Using the presidential status to help the public? Trump estate banquet to make money

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說這專頁讚 2.6 萬 按讚次數

成為朋友中第一個說這讚的人

# EXHIBIT I

| Basic Information  |  |
|--------------------|--|
| product name       | With the US President Trump's New Year's Journey |
| Area               | Beijing  |
| price              | \$120,000  |
| Start and end time | 2018-12-31 - 2018-12-31                          |
| consumer hotline   | 4006880598                                       |
| Video address      |  |

US President's New Year's Eve Dinner Invitation

The world's only 6-star diamond award private club, Florida Palm Beach Sea Lake Estate



The current US President Trump (Champ) has hosted President Xi and Mrs. Peng at Haihu Manor. Here you can experience the life of the top private clubs in the United States, and enjoy the professional golf course, swimming pool facilities and unobstructed private

Beach and palatial bar ballroom. What's more important is that you can get close to the members of the Trump Club and face the US president and the aides... Is this a great opportunity for the elite ? What are you waiting for, act now! ! !

First, the time: 2018 Nian 12 Yue 31 Ri

2. Location: Haihu Manor (Mar-a-Lago)

Third, the qualifications and conditions for attending the dinner (currently only four places):

Participants need to have sufficient financial and social status, and pass a rigorous background, qualification and security review. Once they are invited to attend the White House, they must submit their application by November. Other participants must complete the payment by December. Related procedures. According to the invitation letter, go through all the procedures for going abroad.

This is the best feast in the United States in a year.

The longest feast: 5 pm to the fireworks porch to 1 am

The longest interaction and photo opportunity with the president's family and top riches is not allowed to carry a mobile phone or camera. A professional photographer has the opportunity to take a photo with the president and the president's family at the reception.





**Fourth, attending guests:**

Cd

US President Trump and his first daughter, Ivanka and her husband





The eldest son and the couple, the second son and the couple, the president, the banker's sister, and the husband's members of the Trump staff

America's top billionaire

**Ba**

**Five, travel hotspots:**

2. Make friends with the elite and become a member of Haihu Manor. This opportunity is the first pass. It is very difficult to apply for membership. It must be strictly reviewed by three member recommendations and identity backgrounds to be approved.

4.2019 in 1 Yue 1 Ri at the Trump golf course, and business tycoons fighting a docking friendship golf (based on customer needs other arrangements, cost extra)

5. Take a dip in Miami on a private jet or private yacht.

## Sixth, itinerary planning

A Itinerary: VIP Service B Itinerary: Supreme Service

« »

1, the price: 120,000 US dollars (including the United States 1, the price: 150,000 US dollars (including the United States  
Round-trip ordinary airfare in the country) All expenses for domestic and international flights

2, 3 days 2 nights (only participate in the New Year's Eve 2, 6 days 5 nights (New Year's Eve dinner + Regal High Feast) Wolf Ball, Washington + Miami)

3, Miami five-star hotel 1 night 3, Congress, White House visit two-day tour

4, Haihu Manor Residence 1 night 4, Haihu Manor Residence 1 night

Note: Full-time pick-up luxury car and special features 5, Miami luxury tour, 2 nights 5 stars

Hua cuisine, if you stay in New York, Huasheng Hotel

Don't pay for other cities.

« « « « « « « « « «

Note: Expected to arrive in Washington on December 25

SAR, one night Washington six-star Trump

Grand Hotel (depending on White House time)

« « « « « « « « « «

※ If the customer has other needs, additional fees will be customized according to the needs of the guests.

Elite people believe that they have already perceived themselves differently. Why can't you be in the president's feast?