



April 6, 2026

The Honorable Jeanine Ferris Pirro
U.S. Attorney for the District of Columbia
601 D Street, NW
Washington, D.C. 20001

Sent via email (usadc.webmaster@usdoj.gov)

Dear Ms. Pirro:

Campaign Legal Center (“CLC”) writes to request that the U.S. Attorney’s Office for the District of Columbia investigate whether lobbyists’ undisclosed donations to President Donald J. Trump’s legacy projects violate federal lobbying law. Specifically, the Lobbyist Disclosure Act, as amended (“LDA”), requires lobbyists to disclose donations to entities that the president “established, financed, maintained, or controlled.”¹ If lobbyists did not disclose donations to the following entities, they may have violated the LDA and could be subject to civil penalties:² the White House Ballroom Project (“Ballroom Project”); Freedom 250; the Donald J. Trump and the John F. Kennedy Memorial Center for the Performing Arts (“Trump Kennedy Center”); and the Trump Presidential Library (collectively, “Trump Legacy Projects”).

The scale of these potential violations is unprecedented and warrants an investigation to uphold the integrity and purpose of the LDA. Media reporting identifies approximately 35 lobbying organizations that failed to disclose millions of dollars in donations to Trump Legacy Projects, but the total number of individual lobbyists and organizations involved is unknown.

¹ 2 U.S.C. § 1604(d)(1)(E)(iii).

² 2 U.S.C. § 1606(a).

The LDA is intended to provide “public awareness of the efforts of paid lobbyists to influence the public decisionmaking process” and “increase public confidence in the integrity of Government.”³ Your office is responsible for enforcing this law and delivering the necessary transparency for the public.⁴ For these reasons, an investigation is needed to expose violations and inform the public of hidden attempts to influence the president.

I. Lobbyist Employers are Required to Disclose Donations to Entities Established, Financed, Maintained, or Controlled by the President

Federal lobbying law requires lobbyists and organizations that employ in-house lobbyists (“lobbyist employers”) to disclose certain donations to entities that benefit government officials, including organizations closely connected to the president. Pursuant to the LDA, as amended by the Honest Leadership and Open Government Act of 2007 (“HLOGA”), lobbyists must disclose in semi-annual donation reports called LD-203s, *inter alia*, the amount donated to: 1) “an entity established, financed, maintained, or controlled by a . . . covered executive branch official, or an entity designated⁵ by such official;”⁶ and 2) “each Presidential library foundation, and each Presidential inaugural committee.”⁷ A “covered executive branch official” includes the president.⁸

The LDA’s semi-annual reporting requirement overlaps with reporting requirements under the Federal Election Campaign Act (“FECA”), and the LDA’s reference to “an entity established, financed, maintained, or controlled” by an official is the same phrase used in campaign finance law. Congress’ guidance interpreting the LDA (“LDA Guidance”) explains that the semi-annual reporting requirement “is written broadly, and, in light of other legal provisions . . . it may be prudent to consult with the Federal Election Commission as well.”⁹ The Federal Election Commission’s regulations provide that determining whether an official

³ 2 U.S.C. § 1601(1), (3).

⁴ 2 U.S.C. § 1605(8).

⁵ Matt Corley and Adam Rappaport, *White House ballroom donations should be disclosed on lobbying disclosure reports*, CREW (Feb. 4, 2026), <https://www.citizensforethics.org/reports-investigations/crew-investigations/white-house-ballroom-donations-should-be-disclosed-on-lobbying-disclosure-reports/>.

⁶ 2 U.S.C. § 1604(d)(1)(E)(iii).

⁷ 2 U.S.C. § 1604(d)(1)(F).

⁸ 2 U.S.C. § 1602(3).

⁹ Lobbying Disclosure Act Guidance (Feb. 28, 2025), <https://lobbyingdisclosure.house.gov/ldaguidance.pdf> (“Lobbying Disclosure Act Guidance”).

“established, finances, maintains, or controls an entity,”¹⁰ depends on factors, including but not limited to, whether the official:

- 1) “directly or through [his] agent, had an active or significant role in the formation of the entity;”¹¹
- 2) “directly or through [his] agent, has the authority or ability to hire, appoint, demote, or otherwise control the officers, or other decision-making employees or members of the entity;”¹²
- 3) “directly or through [his] agent, causes or arranges for funds in a significant amount or on an ongoing basis to be provided to the entity;”¹³
or
- 4) “directly or through [his] agent, has the authority or ability to direct or participate in the governance of the entity through . . . formal or informal practices or procedures.”¹⁴

Factors that indicate an entity is not established, financed, maintained, or controlled by an official are also described in the LDA Guidance.¹⁵ For example, an official’s role in creating the organization is not significant if an “organization [was] established by a person before that person became a covered official and where that official has no relationship to the organization after becoming a covered official.”¹⁶ If the official’s role in financing or fundraising for the organization is a “de minimis donation to a charity (in proportion to the charity’s overall receipts of donations) [that] is not an indication of financing, maintaining, or controlling the charity (although supplemental facts might require reporting the donation).”¹⁷

Accordingly, if an official established an organization after entering office, formally or informally participates in the governance of the entity and has solicited significant proportions of the organization’s overall fundraising, it is evidence that the entity is established, financed, maintained, or controlled by the official.

Regarding presidential libraries, the LDA requires that donations to a presidential library foundation must be reported with the date, name of the official,

¹⁰ 11 C.F.R. § 300.2(c)(2).

¹¹ 11 C.F.R. § 300.2(c)(2)(ix).

¹² 11 C.F.R. § 300.2(c)(2)(iii).

¹³ 11 C.F.R. § 300.2(c)(2)(viii).

¹⁴ 11 C.F.R. § 300.2(c)(2)(ii).

¹⁵ Pub. L. No. 110-81 (2007), <https://www.congress.gov/bill/110th-congress/senate-bill/1>.

¹⁶ Lobbying Disclosure Act Guidance at 22.

¹⁷ *Id.*

and recipient of the funds that equal or exceed \$200.¹⁸ This requirement also includes donations to the presidential inaugural committee.

The U.S. Attorney’s Office for the District of Columbia is responsible for enforcing the LDA.¹⁹ Those who knowingly fail to comply are subject to a civil fine of not more than \$200,000. “Whoever knowingly and corruptly fails to comply . . . shall be imprisoned for not more than 5 years or fined.”²⁰

II. Lobbyists Did Not Disclose Donations to President Trump’s Ballroom Project

On July 31, 2025, the White House announced that the East Wing would be demolished, and a new state ballroom would be constructed in its place.²¹ President Trump said the construction costs for the Ballroom Project, expected to be more than \$250 million at the outset of the project, would be paid for with private donations, not public funds.²²

This entity is also known as the East Wing Modernization Project²³ and is funded by donations to the Trust for the National Mall earmarked²⁴ for the Ballroom Project. The Trust for the National Mall, a 501(c)(3) organization that supports the National Park Service, acts as a pass-through organization to enable tax-deductible donations for the Ballroom Project, but it is not involved in soliciting donations or managing the operations of the project.²⁵

At least 26 known lobbyist employers donated to the Ballroom Project without complying with the reporting requirements. President Trump’s extensive role in forming, fundraising, and directing the Ballroom Project, which resulted in

¹⁸ 2 U.S.C. § 1604(d)(1)(F).

¹⁹ 2 U.S.C. § 1605(a)(8).

²⁰ 2 U.S.C. § 1606(b).

²¹ The White House, *The White House Announces White House Ballroom Construction to Begin* (Jul. 31, 2025), <https://www.whitehouse.gov/briefings-statements/2025/07/the-white-house-announces-white-house-ballroom-construction-to-begin/> (attached as Exhibit A).

²² Darlene Superville, *9 things to know about the \$250 million ballroom Trump is adding to the White House*, PBS News (Oct. 23, 2025), [https://www.pbs.org/newshour/politics/9-things-to-know-about-the-250-million-ballroom-trump-is-adding-to-the-white-house#:~:text=Who%20is%20paying%20the%20\\$250,list%20and%20breakdown%20of%20funds.&text=Some%20\\$22%20million%20for%20the,own%20money%20Trump%20is%20contributing.](https://www.pbs.org/newshour/politics/9-things-to-know-about-the-250-million-ballroom-trump-is-adding-to-the-white-house#:~:text=Who%20is%20paying%20the%20$250,list%20and%20breakdown%20of%20funds.&text=Some%20$22%20million%20for%20the,own%20money%20Trump%20is%20contributing.)

²³ Joshua Fisher Declaration ¶ 4, *Nat’l Tr. for Historic Preservation in the U.S. v. Nat’l Park Serv.*, No. 1:25-cv-04316-RJL (D.D.C. Jan. 15, 2026), <https://storage.courtlistener.com/recap/gov.uscourts.dcd.287645/gov.uscourts.dcd.287645.30.1.pdf>.

²⁴ Jessica Bowron Declaration ¶¶ 12-13, *Nat’l Tr. for Historic Preservation in the U.S. v. Nat’l Park Serv.*, No. 1:25-cv-04316-RJL (D.D.C. Jan. 15, 2026), <https://storage.courtlistener.com/recap/gov.uscourts.dcd.287645/gov.uscourts.dcd.287645.30.3.pdf>.

²⁵ *Id.* ¶¶ 11-13.

raising over \$350 million, subjects the lobbyist employers who donated to the project to the LDA's reporting requirements. To date, only one company has reported a donation to the Ballroom Project on its LD-203 report.²⁶

A. President Trump's Role in Establishing, Financing, Maintaining, or Controlling the Ballroom Project

The Ballroom Project appears to be established, financed, maintained, or controlled by the president.

1. *Establishing*

President Trump "directly or through [his] agent, had an active or significant role in the formation"²⁷ of the Ballroom Project. He began publicly discussing the formation of the project in June 2025, when he said, "I'm going to give . . . the White House the most beautiful ballroom you've ever seen."²⁸ A month later, on July 31, 2025, the White House announced the beginning of the ballroom construction because President Trump "expressed his commitment"²⁹ to solving the problem of the White House not having a large event space.

President Trump was involved in establishing the Ballroom Project during the weeks prior to the White House construction announcement, holding "several meetings with members of the White House Staff, the National Park Service, the White House Military Office, and the United States Secret Service to discuss design features and planning."³⁰ The announcement also made clear that President Trump himself chose the lead architect of the project, showing that he was closely involved in the initial establishment stages.³¹ Additionally, the White House Chief of Staff explained President Trump's role in establishing and leading the project when she announced that "[t]he President and the Trump White House are fully committed to working with the appropriate organizations to preserving the special history of the White House while building a beautiful ballroom."³²

²⁶ Vantive US Healthcare LLC Lobbying Contribution Report, Year-End 2025, <https://lda.gov/filings/public/contribution/c205e636-9a57-43e0-9e72-166ec938b826/print/>.

²⁷ 11 C.F.R. § 300.2(c)(2)(ix).

²⁸ Interview: Miranda Devine Interviews Donald Trump for Her Pod Force One Podcast Transcript (Jun. 9, 2025), <https://rollcall.com/factbase/trump/transcript/donald-trump-interview-miranda-devine-podcast-june-9-2025>.

²⁹ The White House, *The White House Announces White House Ballroom Construction to Begin* (Jul. 31, 2025), <https://www.whitehouse.gov/briefings-statements/2025/07/the-white-house-announces-white-house-ballroom-construction-to-begin/>.

³⁰ *Id.*

³¹ *Id.*

³² *Id.*

2. *Financing or Maintaining*

The president “directly or through [his] agent, causes or arranges for funds in a significant amount or on an ongoing basis to be provided”³³ to the project. From the beginning of the Ballroom Project, President Trump has stated that he will fund the project himself and with private donors.³⁴ This was confirmed by the White House: “President Trump, and other patriot donors, have generously committed to donating the funds necessary to build this approximately \$200 million dollar structure.”³⁵

President Trump has arranged for funds for the Ballroom Project by engaging his top political fundraiser, Meredith O’Rourke. According to reporting, Ms. O’Rourke “is leading the effort, paired with the Trust for the National Mall, an organization that supports the National Park Service.”³⁶ Importantly, the trust’s nonprofit status means donations to the Ballroom Project are tax deductible.³⁷ According to media reports, Ms. O’Rourke President Trump’s political fundraiser solicits donations that pass through the Trust for the National Mall, but the Trust has no role in soliciting the donations. In fact, President Trump appears to have complete authority over fundraising through his agent, Ms. O’Rourke, as the Trust for the National Mall informed Congress that “it has not been involved in conversations to solicit funds or regarding the design or planning for the project. In addition, the Trust has no contractual agreement with fundraiser Meredith O’Rourke related to the Ballroom project.”³⁸

President Trump’s own fundraising efforts raised over \$350 million for the Ballroom Project.³⁹ Lobbyist employers confirmed that the White House’s solicitations prompted their donations. For example, Microsoft informed Congress

³³ 11 C.F.R. § 300.2(c)(2)(viii).

³⁴ Arden Farhi & Jennifer Jacobs, *Who’s paying for the White House ballroom and what’s in it for them*, CBS News (Sep. 19, 2025), <https://www.cbsnews.com/news/trump-white-house-ballroom-donor-names/>.

³⁵ The White House, *The White House Announces White House Ballroom Construction to Begin* (Jul. 31, 2025), <https://www.whitehouse.gov/briefings-statements/2025/07/the-white-house-announces-white-house-ballroom-construction-to-begin/>.

³⁶ Arden Farhi & Jennifer Jacobs, *Who’s paying for the White House ballroom and what’s in it for them*, CBS News (Sep. 19, 2025), <https://www.cbsnews.com/news/trump-white-house-ballroom-donor-names/>.

³⁷ *Id.*

³⁸ Trust for the National Mall Letter Response to Senator Elizabeth Warren (Jan. 28, 2026), https://www.warren.senate.gov/imo/media/doc/response_from_the_national_trust_to_senator_warren_-_january_2026.pdf.

³⁹ Remarks: Donald Trump Speaks at a Homeland Security Roundtable (Oct. 23, 2025), <https://rollcall.com/factbase/trump/transcript/donald-trump-remarks-homeland-security-roundtable-october-23-2025/>.

that it was “contacted by a fundraiser for the effort regarding a possible donation,”⁴⁰ and Amazon explained that it “communicated with the fundraising group working on the White House Ballroom project.”⁴¹ These solicitations from the president’s agents included invitations for certain donors to attend at least one dinner with the president at the White House to recognize the donors. At the dinner, president unveiled his plans to build an arch over the Arlington Memorial Bridge with the leftover funds from the Ballroom Project,⁴² indicating that his efforts to finance the White House Ballroom project were successful enough to also fund other legacy projects.⁴³

3. *Controlling*

President Trump “directly or through [his] agent, has the authority or ability to direct or participate in the governance of”⁴⁴ and the “authority or ability to hire [or] appoint”⁴⁵ people to, the Ballroom Project. The White House has emphasized President Trump’s leadership role with the project’s development, design, and construction. The official announcement of the project revealed that “President Trump has chosen McCrery Architects as lead architect,” demonstrating his control over the project’s design and overall direction, as well as his hiring authority.⁴⁶

Other public statements detail the president’s involvement in sharing the designs for the new ballroom,⁴⁷ explaining the design elements,⁴⁸ and even shopping

⁴⁰ Microsoft Letter Response to Senator Elizabeth Warren (Dec. 16, 2025), <https://www.warren.senate.gov/imo/media/doc/Microsoft%20Response%20to%20Senator%20Warren%20and%20Representative%20Min%20on%20Ballroom%20Donations.pdf>.

⁴¹ Amazon Letter Response to Senator Elizabeth Warren (Dec. 16, 2025), <https://www.warren.senate.gov/imo/media/doc/Amazon%20Response%20to%20Senator%20Warren%20and%20Representative%20Min%20on%20Ballroom%20Donations.pdf>.

⁴² Seung Min Kim, *WATCH: Trump hosts dinner for donors to \$250 million White House ballroom project*, PBS News (Oct. 16, 2025), <https://www.pbs.org/newshour/politics/watch-trump-hosts-dinner-for-donors-to-250-million-white-house-ballroom-project>.

⁴³ Aishvarya Kavi, *What to Know About Trump’s Plan for a Triumphal Arch*, N.Y. Times (updated Oct. 24, 2025), <https://www.nytimes.com/2025/10/21/us/politics/trump-arch-washington-memorial.html>.

⁴⁴ 11 C.F.R. § 300.2(c)(2)(ii).

⁴⁵ 11 C.F.R. § 300.2(c)(2)(iii).

⁴⁶ The White House, *The White House Announces White House Ballroom Construction to Begin* (Jul. 31, 2025), <https://www.whitehouse.gov/briefings-statements/2025/07/the-white-house-announces-white-house-ballroom-construction-to-begin/>.

⁴⁷ Junho Lee, Ashley Wu, & Jon Huang, *Trump’s Lopsided Vision for the White House*, N.Y. Times (Mar. 4, 2026), <https://www.nytimes.com/interactive/2026/03/04/us/politics/trump-white-house-east-wing-ballroom-design-plan.html>.

⁴⁸ Donald J. Trump (@realDonaldTrump), TruthSocial (Feb. 3, 2026), <https://truthsocial.com/@realDonaldTrump/posts/116008650149765600> (attached as Exhibit B).

and planning to pay for the marble and onyx for the ballroom.⁴⁹ President Trump delegated management of the project to the Director for White House Management and Administration.⁵⁰ The director suggested that the president is responsible for final design of the ballroom, as it is “the subject of ongoing discussions between the president, the architect, and the relevant contractors.”⁵¹ The National Park Service determined that although it has authority over the White House, “it was in the best interests of the United States for [the Executive Residence at the White House] to contract for and directly manage the Project.”⁵² In other words, the National Park Service concedes that the Ballroom Project is under the complete authority of President Trump.

Overall, a lobbyist employer must report their donations if an entity is established, financed, maintained, *or* controlled by the president. The Ballroom Project meets that standard. The nature of the president’s close involvement with the Ballroom Project is publicized directly by the president and the White House, providing notice to all lobbyist employer donors that disclosure requirements apply.

B. Lobbyist Employers Failed to Disclose Donations to the Ballroom Project

Under the LDA, any donations to entities directly or indirectly affiliated with an executive branch or legislative branch official must be disclosed if the entity is established, financed, maintained, or controlled by an official. Despite the publicly available information about the Ballroom Project outlined above, at least 26 lobbyist employers did not disclose the details of the donations.

The identities of many of the lobbyist employers were revealed on October 23, 2025, when the White House released a list of donors to the Ballroom Project.⁵³ Some of these lobbyist employers acknowledged their awareness that President Trump is leading the project. For example, Lockheed Martin told Congress that it “is grateful for the opportunity to help bring the president’s vision to reality and make this addition to the People’s House, a powerful symbol of the American ideals

⁴⁹ Adam Cancryn, *Trump shops for marble for new White House ballroom*, CNN (Jan. 2, 2026), <https://www.cnn.com/2026/01/02/politics/white-house-ballroom-marble-trump>.

⁵⁰ Joshua Fisher Declaration ¶ 3, *Nat’l Tr. for Historic Preservation in the U.S.*, No. 1:25-cv-04316-RJL (D.D.C. Jan 15, 2026),

<https://storage.courtlistener.com/recap/gov.uscourts.dcd.287645/gov.uscourts.dcd.287645.30.1.pdf>.

⁵¹ *Id.* ¶ 13.

⁵² Jessica Bowron Declaration ¶ 10, *Nat’l Tr. for Historic Preservation*, No. 1:25-cv-04316-RJL (D.D.C. Jan. 15, 2026),

<https://storage.courtlistener.com/recap/gov.uscourts.dcd.287645/gov.uscourts.dcd.287645.30.3.pdf>.

⁵³ Kit Maher, Jake Tapper, & Alejandra Jaramillo, *White House releases list of donors for Trump’s multi-million-dollar ballroom*, CNN (Oct. 23, 2025),

<https://www.cnn.com/2025/10/23/politics/ballroom-donors-white-house-trump>.

we work to defend every day.”⁵⁴ Other companies explained that their “decision to give money was based on a desire to show support for Mr. Trump while backing what they view as a nonpartisan cause”⁵⁵

The following 26 lobbyist employers donated to the Ballroom Project according to the White House and public reporting, but they did not disclose amount, date, or any information about the donations in their lobbying reports for the relevant time period:

**Known Lobbyist Employers Who Did Not Report
Donations to the Ballroom Project**

Akin Gump*	Comcast Corporation	Palantir Technologies Inc.
Altria Group	Google	Parsons Corporation*
Amazon	HP Inc.	Reynolds American
Apple	Lockheed Martin	Ripple
Ballard Partners*	Meta Platforms	Roblox*
BlackRock	Micron	SHW Partners*
Booz Allen Hamilton	Microsoft	T-Mobile
Caterpillar	Miller Strategies*	Union Pacific Railroad
Coinbase	NextEra Energy Inc.	

*Individuals, including registered lobbyists representing these lobbyist employers, likely donated to the Ballroom Project

In contrast, Vantive reported their donation towards the Ballroom Project on their LD-203, likely because they recognized President Trump’s participation in the project required reporting under the LDA.⁵⁶

The publicly available information on numerous lobbyists’ donations to the Ballroom Project, coupled with seemingly widespread LDA non-compliance, signals the potential of many unknown individual lobbyists and lobbyist employers who have donated to the project, are not in any media reports, and failed to file the necessary disclosures.

⁵⁴ Ashleigh Fields, *Who’s funding Trump’s \$250M ballroom renovation?*, The Hill (Oct. 21, 2025), <https://thehill.com/homenews/administration/5565273-trump-white-house-ballroom-funding-plans/>.

⁵⁵ Arden Farhi & Jennifer Jacobs, *Who’s paying for the White House ballroom and what’s in it for them*, CBS News (Sep. 19, 2025), <https://www.cbsnews.com/news/trump-white-house-ballroom-donor-names/>.

⁵⁶ Vantive US Healthcare LLC Lobbying Contribution Report, Year-End 2025, <https://lda.gov/filings/public/contribution/c205e636-9a57-43e0-9e72-166ec938b826/print/>.

III. Lobbyists Did Not Disclose Donations to Freedom 250

Freedom 250 is a recently created organization designed to plan and finance various events during the nation’s semiquincentennial.⁵⁷ It is a non-profit LLC that is technically a wholly owned subsidiary of the National Park Foundation (“NPF”). However, publicly available information indicates that President Trump, not NPF, directs and controls operations and fundraising of Freedom 250.

Similar to the Ballroom Project, President Trump has publicly indicated that he is involved in the Freedom 250’s creation, fundraising, and decision-making. The president’s control and influence over Freedom 250 distinguishes it from another organization authorized to plan such events, America 250, which is the bipartisan entity created by Congress in 2016.⁵⁸ Many lobbyists have not disclosed donations to Freedom 250, even with the common knowledge of the president’s central leadership role in the organization.

A. Trump’s Role in Establishing, Financing, Maintaining, and Controlling Freedom 250

Freedom 250 appears to be an entity established, financed, maintained, or controlled by the president.

1. *Establishing*

President Trump “directly or through [his] agent, had an active or significant role in the formation”⁵⁹ of Freedom 250. On January 29, 2025, President Trump “established the White House Task Force on Celebrating America’s 250th Birthday,” naming himself as the Chair of the Task Force.⁶⁰ In December 2025, the “funding arm of Task Force 250”⁶¹ was announced when President Trump posted a video stating that “We have created a new public-private partnership. It’s called Freedom 250. Working with states, companies, and organizations across the country, we will

⁵⁷ Dan Diamond, Cat Zakrzewski, & Emily Davies, *Trump allies expand role in planning America’s 250th anniversary*, The Washington Post (Mar. 5, 2026), <https://www.washingtonpost.com/politics/2026/03/05/america-250-freedom-250-trump-celebration/>.

⁵⁸ Pub. L. No. 114-196 (July 22, 2016).

⁵⁹ 11 C.F.R. § 300.2(c)(2)(ix)

⁶⁰ The White House, *Celebrating America’s 250th Birthday* (Jan. 29, 2025), <https://www.whitehouse.gov/presidential-actions/2025/01/celebrating-americas-250th-birthday/> (attached as Exhibit C).

⁶¹ Karissa Waddick, *Trump launches Freedom 250 to add his mark on USA 250 celebrations*, USA Today (Dec. 19, 2025), <https://www.usatoday.com/story/news/nation/2025/12/19/trump-america-250-political/87832202007>.

renew the patriotism, pride, and pioneering spirit of America, and lay the groundwork for the next 250 years of independence and freedom.”⁶²

In addition, President Trump “has the authority or ability to hire, appoint, demote, or otherwise control the officers, or other decision-making employees or members of the entity.” Beyond naming himself chair, a position that typically comes with these powers, the president selected the leader of Freedom 250, Keith Krach. Mr. Krach confirmed the dominant role of the president, saying “I am grateful to President Trump for the opportunity to execute his vision for Freedom 250.”⁶³ Freedom 250 LLC was registered as a non-profit in Washington, DC in November 2025.⁶⁴

2. *Financing or Maintaining*

The president “directly or through [his] agent, causes or arranges for funds in a significant amount or on an ongoing basis to be provided”⁶⁵ to Freedom 250. The same political fundraiser President Trump deputized to solicit donations for the White House Ballroom project also arranges funds for Freedom 250: “Meredith O’Rourke, the president’s top fund-raiser, is amassing private donations for Freedom 250. Her team is circulating a solicitation, obtained by The New York Times, offering ‘bespoke packages’ for donors.”⁶⁶ The president participates directly in the packages for donors. Those contributing at least \$1 million will receive an “invitation to a private *Freedom 250* thank you reception hosted by President Donald J. Trump, with a historic photo opportunity.”⁶⁷

3. *Controlling*

In addition, the president “directly or through [his] agent, has the authority or ability to direct or participate in the governance of”⁶⁸ Freedom 250. Freedom 250 was established as the president’s own vehicle to make decisions for the

⁶² The White House (@WhiteHouse), X (Dec. 18, 2025), <https://x.com/WhiteHouse/status/2001635004074373225?s=20> (attached as Exhibit D).

⁶³ Keith Krach, President Trump Appoints Keith Krach CEO of Freedom 250, Leading America’s 250th Birthday Celebration (Dec. 22, 2025), <https://keithkrach.com/article/president-trump-appoints-keith-krach-ceo-of-freedom-250-leading-americas-250th-birthday-celebration/> (attached as Exhibit E).

⁶⁴ District of Columbia Government Foreign Registration Form for Freedom 250 LLC (attached as Exhibit F).

⁶⁵ 11 C.F.R. § 300.2(c)(2)(viii).

⁶⁶ Kenneth P. Vogel, Lisa Friedman, & David A. Fahrenthold, *For \$1 Million, Donors to U.S.A. Birthday Group Offered Access to Trump*, N.Y. Times (Feb. 8, 2026), <https://www.nytimes.com/2026/02/08/us/politics/freedom-250-trump-donors.html>.

⁶⁷ Freedom 250 Sponsorship Packages, <https://perma.cc/H9MG-XPP3>.

⁶⁸ 11 C.F.R. § 300.2(c)(2)(ii).

semiquincentennial that are not limited by the bi-partisan entity created by Congress, America 250. America 250 explains this distinction: “Freedom 250 will lead the delivery of the president’s national signature events.”⁶⁹

President Trump participates significantly in Freedom 250’s event planning. As the Chair of the Task Force, he develops the vision that Freedom 250 implements. His involvement included the signing of “an Executive Order launching the Freedom 250 Grand Prix of Washington, DC.”⁷⁰ President Trump also “indicated in his announcement video that Freedom 250 would help facilitate a National Garden of American Heroes, a sculpture garden of 250 prominent American figures; a ‘beautiful triumphal arch’ near the Lincoln Memorial in the style of the Arc de Triomphe in Paris; and a U.F.C. fight on the White House grounds.”⁷¹

B. Lobbyist Employers Failed to Disclose Donations to Freedom 250

Freedom 250 revealed the names of a few lobbyists who donated to the project, but we the date, amount, or the identity of any other donors is unknown because no lobbyist has disclosed donations to Freedom 250 in their LD-203 reports. Specifically, the following lobbyist employers are listed as sponsors on the Freedom 250 website,⁷² but they have not disclosed their donations:

Known Lobbyist Employers Who Did Not Report Donations to Freedom 250

Deloitte	Oracle
ExxonMobil	Palantir
John Deere	Penske
Mastercard	

In sum, it is reasonable to assume that President Trump’s selection of the same person to fundraise for his Ballroom Project and Freedom 250 results in

⁶⁹ *Presidential Initiatives*, America 250, <https://america250.org/presidential-initiatives/> (last visited Apr. 1, 2026).

⁷⁰ The White House, Fact Sheet: President Donald J. Trump Celebrates American Greatness with the Freedom 250 Grand Prix of Washington, D.C. (Jan. 30, 2026), <https://www.whitehouse.gov/fact-sheets/2026/01/fact-sheet-president-donald-j-trump-celebrates-american-greatness-with-the-freedom-250-grand-prix-of-washington-d-c/> (attached as Exhibit G).

⁷¹ Kenneth P. Vogel, Lisa Friedman, & David A. Fahrenthold, *For \$1 Million, Donors to U.S.A. Birthday Group Offered Access to Trump*, N.Y. Times (Feb. 8, 2026), <https://www.nytimes.com/2026/02/08/us/politics/freedom-250-trump-donors.html>.

⁷² Freedom 250, Freedom 250 Network, <https://freedom250.org/freedom-250-network> (attached as Exhibit H).

similar solicitations of lobbyist employers. However, there has been even less transparency concerning the Freedom 250 donors. President Trump’s role in Freedom 250 implicates the lobbyist disclosure requirements and an investigation is needed to reveal the extent of LDA violations.

IV. Lobbyists Did Not Disclose Donations to the Trump Kennedy Center

President Trump has engaged in a multifaceted project to control, shutter, and remake the John F. Kennedy Center for the Performing Arts. Although the Kennedy Center was created before President Trump entered office, his extensive role in re-forming, directing, and financing the newly renamed Trump Kennedy Center is evidence that this current entity triggers lobbyist disclosure requirements.

The Trump Kennedy Center is a public private partnership wherein it receives federal funding every year to “pay for capital repairs and maintenance of the buildings and grounds.”⁷³ The artistic programs, education initiatives, and most administrative functions are almost entirely paid through donations from individuals, corporations, private individuals, and ticket sales.⁷⁴

As detailed below, President Trump is the first president to lead the organization as the chair of the Board of Trustees, and the donations he directly and indirectly solicits have only been disclosed by a few lobbyist employers.

A. Trump’s Role in Establishing, Financing, Maintaining, and Controlling the Trump Kennedy Center

The Trump Kennedy Center appears to be an entity established, financed, maintained, or controlled by the president.

1. Establishing

Publicly available information suggests that President Trump “directly or through [his] agent, had an active or significant role in the formation” of the Trump Kennedy Center.⁷⁵ On February 7, 2025, President Trump announced that “[a]t my direction, we are going to make the Kennedy Center in Washington D.C., GREAT AGAIN.”⁷⁶ President Trump terminated members of the John F. Kennedy Center

⁷³ *History*, The Trump Kennedy Center, <https://www.kennedy-center.org/our-story/history/> (last visited Apr. 1, 2026).

⁷⁴ *Id.*

⁷⁵ 11 C.F.R. § 300.2(c)(2)(ix).

⁷⁶ Shawn McCreesh, Maggie Haberman, & Javier C. Hernández, *Trump Says He Will Dismiss Kennedy Center Board Members and Install Himself as Chair*, N.Y. Times (updated Feb. 9, 2025), <https://www.nytimes.com/2025/02/07/us/politics/trump-kennedy-center.html>.

for the Performing Arts Board of Trustees and selected his own replacements.⁷⁷ On February 12, the new Board voted to replace the chair with President Trump.⁷⁸ On December 18, 2025, the Board unanimously voted to rename the Kennedy Center The Donald J. Trump and The John F. Kennedy Memorial Center for the Performing Arts (“the Trump Kennedy Center”).⁷⁹ The next day, the president’s name was added to the building.⁸⁰

2. *Financing or Maintaining*

The president “directly or through [his] agent, causes or arranges for funds in a significant amount or on an ongoing basis to be provided”⁸¹ to the Trump Kennedy Center. President Trump reportedly “raised a record \$23 million”⁸² for the Center when he hosted the Kennedy Center Honors. After reports of fundraising trouble, President Trump “tapped his longtime supporter Meredith O’Rourke to stabilize the Kennedy Center’s fundraising operation.”⁸³

“The Kennedy Center raised \$130 million from February 2025 to December 2025, including from big companies such as defense company RTX, the firm Booz Allen Hamilton and online retailer Amazon.com.”⁸⁴ According to the White House Press Secretary, “[m]any great American companies and patriots have stepped forward to donate to the Trump-Kennedy Center.”⁸⁵

3. *Controlling*

The president “directly or through [his] agent, has the authority or ability to direct or participate in the governance of the entity” and he “has the authority or

⁷⁷ *Id.*

⁷⁸ Neda Ulaby, *New board elects President Trump chair of Kennedy Center*, NPR (Feb. 12, 2025), <https://www.npr.org/2025/02/12/nx-s1-5294697/trump-kennedy-center-chairman>.

⁷⁹ Betsy Klein, *Kennedy Center board votes to rename it ‘Trump Kennedy Center’*, CNN (Dec. 18, 2025), <https://www.cnn.com/2025/12/18/politics/trump-kennedy-center-name>.

⁸⁰ Andrew Limbong, *President Trump adds his own name to the Kennedy Center*, NPR (Dec. 19, 2025), <https://www.npr.org/2025/12/18/nx-s1-5648519/kennedy-center-name-change-trump>.

⁸¹ 11 C.F.R. § 300.2(c)(2)(viii).

⁸² Jasmine Baehr, *Exclusive: Trump-led Kennedy Center nearly doubles fundraising from Biden era, smashing record with \$23M haul*, Fox News (Dec. 6, 2025), <https://www.foxnews.com/politics/exclusive-trump-led-kennedy-center-nearly-doubles-fundraising-from-biden-era-smashing-record-23m-haul>.

⁸³ Daniel Lippman, *Kennedy Center fundraising in deep turmoil after Trump takeover*, Politico (Feb. 11, 2026), <https://www.politico.com/news/2026/02/11/kennedy-center-fundraising-shop-in-deep-turmoil-after-trump-takeover-00776655>.

⁸⁴ Annie Linskey et al., *Behind Trump’s Push to Remake the Kennedy Center in His Own Image*, Wall Street Journal (Feb. 10, 2026), <https://www.wsj.com/business/kennedy-center-donald-trump-d7a055c3?mod=mhp>.

⁸⁵ *Id.*

ability to hire, appoint, demote, or otherwise control the officers, or other decision-making employees or members of the entity.”⁸⁶ The president took complete control of governance by removing and replacing Board members. He directs a wide range of decisions within the Trump Kennedy Center. “He has the cellphone number of the head of building maintenance—and he calls regularly for updates on fixes at the venerated cultural institution, according to people familiar with the matter.”⁸⁷

More substantial decisions include his announcement that the Trump Kennedy Center would close for two years of renovation, to the surprise of the Center’s Board Members.⁸⁸ He made it clear that he made the decision by posting on social media, “I have determined that The Trump Kennedy Center, if temporarily closed for Construction, Revitalization, and Complete Rebuilding, can be, without question, the finest Performing Arts Facility of its kind, anywhere in the World.”⁸⁹

President Trump is also involved in determining the artists who perform at the Trump Kennedy Center.⁹⁰ On March 16, 2026, it was reported that President Trump “gathered his hand-picked board of trustees of the [Trump Kennedy Center] for a meeting that veered between the war with Iran and his plans to overhaul the Washington cultural landmark.”⁹¹

In summary, President Trump took control of the Kennedy Center to establish the Trump Kennedy Center, which relies on his involvement with operational decisions and fundraising from private donors, including lobbyists. Prior presidents have appointed Board members, but President Trump’s role in the operations and decision-making of the organization is extraordinary, triggering LDA reporting requirements for lobbyist employer donors.

B. Lobbyists Failed to Report Donations to Trump Kennedy Center

Limited public media reports indicate that at least six lobbyist employers donated to the Trump Kennedy Center without disclosing the amount and date of the donations in their lobbyist reports:

Known Lobbyist Employers Who Did Not Report Donations to the Trump Kennedy Center

Amazon ⁹²	Qorvis ⁹³
Anduril ⁹⁴	Meta ⁹⁵
Booz Allen Hamilton ⁹⁶	Latham & Watkins ⁹⁷

⁹² *Id.*

In addition to these companies, it appears that many of the private donations are apparently from lobbyists because “[s]ome of the corporate donors have business before the Trump administration or are seeking to strengthen their ties with the president, according to people involved in the efforts.”⁹⁸ Absent the proper reports, there is no public accounting of who these additional donors may be.

The scope of potential violations could be vast. For example, Chevron and RTX have been donors to the Kennedy Center in previous administrations, but did not begin reporting donations until this administration,⁹⁹ suggesting an awareness that they must report their donations due to President Trump’s involvement with the Trump Kennedy Center. Many other lobbyist employers may have also donated but did not comply with their disclosure obligations, which further establishes the need for an investigation.

V. Lobbyists Did Not Disclose Donations to Trump’s Presidential Library

The LDA requires disclosure of lobbyist employers’ donations to a presidential library foundation, including the date, name of the official, and

⁸⁷ Annie Linskey et al., *Behind Trump’s Push to Remake the Kennedy Center in His Own Image*, Wall Street Journal (Feb. 10, 2026), <https://www.wsj.com/business/kennedy-center-donald-trump-d7a055c3?mod=mhp>.

⁸⁸ Annie Linskey, *Trump Says Kennedy Center Will Close for Two Years for Renovations*, Wall Street Journal (Feb. 2, 2026), https://www.wsj.com/politics/policy/trump-says-kennedy-center-will-close-for-two-years-for-renovations-4e9c21cb?mod=article_inline.

⁸⁹ *Id.*

⁹⁰ Annie Linskey et al., *Behind Trump’s Push to Remake the Kennedy Center in His Own Image*, Wall Street Journal (Feb. 10, 2026), <https://www.wsj.com/business/kennedy-center-donald-trump-d7a055c3?mod=mhp>.

⁹¹ Bo Erickson, *Trump mixes Iran war talk with Kennedy Center overhaul at board meeting*, Reuters (Mar. 16, 2026), <https://www.reuters.com/world/us/kennedy-center-board-vote-closing-renovations-2026-03-16/>.

⁹² *Id.*

⁹³ Donald Shaw, *Companies ‘Honor’ Trump With Kennedy Center Donations*, Sludge (Feb. 9, 2026), <https://readsludge.com/2026/02/09/companies-honor-trump-with-kennedy-center-donations/>.

⁹⁴ *Id.*

⁹⁵ *Id.*

⁹⁶ Annie Linskey et al., *Behind Trump’s Push to Remake the Kennedy Center in His Own Image*, Wall Street Journal (Feb. 10, 2026), <https://www.wsj.com/business/kennedy-center-donald-trump-d7a055c3?mod=mhp>.

⁹⁷ Donald Shaw, *Companies ‘Honor’ Trump With Kennedy Center Donations*, Sludge (Feb. 9, 2026), <https://readsludge.com/2026/02/09/companies-honor-trump-with-kennedy-center-donations/>.

⁹⁸ *Id.*

⁹⁹ RTX Corporation and Affiliates Lobbying Contribution Report, Mid-Year 2025, <https://lda.gov/filings/public/contribution/6b86ef8c-103d-4d4e-bc23-a29ce2274277/print/>; Chevron U.S.A Inc. Lobbying Contribution Report, Year-End 2025, <https://lda.gov/filings/public/contribution/1202b1af-be58-480e-8e0c-de1b1c92f001/print/>.

recipient of the funds that equal or exceed \$200.¹⁰⁰ Therefore, an analysis of whether the library is established, financed, maintained, or controlled by the president is not necessary. Disclosure is per se required.¹⁰¹

Although President Trump established two non-profit organizations to accept donations for his presidential library, multiple lobbyist employers have not disclosed donations to the organizations, and the public is unaware of the full extent of corporate interests financial supporting the president’s legacy project. He first established the Donald J. Trump Presidential Library Fund Inc., which was registered in Florida as a 501(c)(3) organization on December 20, 2024, and was administratively dissolved in September 2025 after failing to file a required annual report. On May 19, 2025, the Donald J. Trump Presidential Library Foundation Inc. was registered in Florida as a 501(c)(3) organization.¹⁰² The trustees are the president’s son, Eric Trump, his son-in-law, Michael Boulos, and his personal attorney, James Kiley.¹⁰³ The listed address for the library is a Trump-owned golf course.¹⁰⁴

Three registered lobbyists entered into agreements to donate a total of \$48 million to the presidential library. One of these lobbyists, Meta, agreed to pay \$25 million to settle a lawsuit by President Trump on January 29, 2025.¹⁰⁵ Of that \$25 million, \$22 million was designated for Trump’s Presidential Library.¹⁰⁶ “Meta Platforms, Inc. and various subsidiaries” filed lobbying disclosure reports for the 2025 reporting period, however the reports do not include the donation to the presidential library fund.¹⁰⁷ Meta’s LD-203 report covering the first six months of its donations in 2025 includes a donation for “Presidential Library Expenses” given

¹⁰⁰ 2 U.S.C. §1604(d)(1)(F).

¹⁰¹ Even if this office determines the entities established by President Trump are not considered foundations, they are still established, maintained, financed, and controlled by the President, making lobbyist disclosures required under the LDA.

¹⁰² Florida Department of State, The Donald J. Trump Presidential Library Foundation, Inc. Articles of Incorporation (May 19, 2025), <https://search.sunbiz.org/Inquiry/CorporationSearch/ConvertTiffToPDF?storagePath=COR%5C2025%5C0523%5C00177827.Tif&documentNumber=N25000006299>.

¹⁰³ *Id.*

¹⁰⁴ Trump National Golf Club, <https://www.trumpnationaljupiter.com/> (last visited Apr. 1, 2026).

¹⁰⁵ Annie Linskey & Rebecca Ballhaus, *Meta to Pay \$25 Million to Settle 2021 Trump Lawsuit*, Wall Street Journal (Jan. 29, 2025), https://www.wsj.com/us-news/law/trump-signs-agreement-calling-for-meta-to-pay-25-million-to-settle-suit-6f734c8c?st=pdbYXT&reflink=article_copyURL_share.

¹⁰⁶ *Id.*

¹⁰⁷ Meta Platforms, Inc. and various subsidiaries Lobbying Contribution Report, Mid-Year 2025, <https://lda.gov/filings/public/contribution/d57e2849-4535-4af7-b8f4-fedfcca976d3/print/>; Meta Platforms, Inc. and various subsidiaries Lobbying Contribution Report, Year-End 2025, <https://lda.gov/filings/public/contribution/2a08fabf-607f-4c21-a4d9-4f945fb27108/print/>.

to “The Ronald Regan Presidential Foundation and Institute,” indicating Meta is aware of the LD-203 disclosure requirement, despite their failure to report here.¹⁰⁸

Another lobbyist employer with undisclosed donations is Paramount, which announced on July 1, 2025¹⁰⁹ that it agreed to give whatever remained of \$16 million, after paying legal fees, to President Trump’s future presidential library to settle a 2021 lawsuit.¹¹⁰ “Paramount Skydance Corporation (FKA Paramount Global)” filed reports lobbying disclosure reports for the 2025 reporting period, however, the reports do not include the donation to the presidential library fund.¹¹¹

A final example of an apparently undisclosed donation involves X, formerly known as Twitter. On February 12, 2025, it was reported that X agreed to pay approximately \$10 million to settle a lawsuit with President Trump,¹¹² with most of that amount going towards the President’s future library.¹¹³ X filed lobbying disclosure reports for the mid-year reporting period in 2025; however, the report does not include the donations to the presidential library fund.¹¹⁴

The failure of these known registered lobbyists to report their donations to Trump’s presidential library fund and the subsequent closure of the fund raises questions about what other lobbyist employers donated to the fund and failed to report their donations.

VI. Conclusion

¹⁰⁸ Meta Platforms, Inc. and various subsidiaries Lobbying Contribution Report, Mid-Year 2025, <https://lda.gov/filings/public/contribution/d57e2849-4535-4af7-b8f4-fedfcca976d3/print/>.

¹⁰⁹ Benjamin Mullin et al., *Paramount to Pay Trump \$16 Million to Settle ‘60 Minutes’ Lawsuit*, N.Y. Times (Jul. 2, 2025), <https://www.nytimes.com/2025/07/02/business/media/paramount-trump-60-minutes-lawsuit.html>.

¹¹⁰ *Id.*

¹¹¹ Paramount Global Lobbying Contribution Report, Mid-Year 2025 <https://lda.gov/filings/public/contribution/c5932fc8-02ba-4be5-bb1d-384bbf28caf9/print/>; Paramount Skydance Corporation (FKA Paramount Global) Lobbying Contribution Report, Year-End 2025, <https://lda.gov/filings/public/contribution/55972b3a-1ec0-4bf9-b0c1-2620bad8b92b/print/>.

¹¹² Annie Linskey and Rebecca Ballhaus, *Musk’s X Agrees to Pay About \$10 Million to Settle Trump Lawsuit*, Wall Street Journal (Feb. 12, 2025), https://www.wsj.com/tech/musks-x-agrees-to-pay-about-10-million-to-settle-trump-lawsuit-a38348f8?gaa_at=eafs&gaa_n=AWetsqeNWX0_1n28S6ZW7wtZm23P1y0USL1u71HAxy13Tqt2mbx1t8PaxV9JHnPgwwz4%3D&gaa_ts=69cc6f06&gaa_sig=0zWNwwC-XFvgJh7H7awDdf6vX9fNjFUnhrEpO7z_s43fbisIJnqUZZP4CvLdbPWLdjBrkqGhuw5wzyKF8pYfOA%3D%3D.

¹¹³ Zeke Miller, *Trump settles suit against Elon Musk’s X over his post-Jan. 6 ban*, AP (Feb. 13, 2025), <https://apnews.com/article/trump-twitter-x-elon-musk-google-9dcb52b84061efdd2cdd102678dc8fea>.

¹¹⁴ X Corp. Lobbying Contribution Report, Mid-Year 2025, <https://lda.gov/filings/public/contribution/a240c808-0624-4bea-86e8-d334a53e5d19/print/>.

The foregoing facts establish evidence of potential rampant non-compliance with federal lobbying disclosure laws by known and unknown corporations seeking to influence the president. The LDA requires the reporting of donations to each of the four entities President Trump created and financed to implement his legacy projects. As the president continues to solicit undisclosed donations for entities implementing his current legacy projects and as he suggests the forming of even more entities, LDA enforcement is imperative. An investigation can expose violations and deter continued misconduct, while informing the public of the hidden influence being exerted on the administration.

Respectfully submitted,

_____/s/_____

Kedric L. Payne
General Counsel, Vice President, and Sr.
Director, Ethics

_____/s/_____

Delaney Marsco
Director, Ethics

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Danielle Caputo
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Sophia Gonsalves-Brown
Senior Researcher, Campaign Finance and
Ethics

EXHIBIT A



BRIEFINGS & STATEMENTS

The White House Announces White House Ballroom Construction to Begin

The White House

July 31, 2025

Washington, D.C. — For 150 years, Presidents, Administrations, and White House Staff have longed for a large event space on the White House complex that can hold substantially more guests than currently allowed. President Donald J. Trump has expressed his commitment to solving this problem on behalf of future Administrations and the American people.

The White House is one of the most beautiful and historic buildings in the world, yet the White House is currently unable to host major functions honoring world leaders and other countries without having to install a large and unsightly tent approximately 100 yards away from the main building entrance. The White House State Ballroom will be a much-needed and exquisite addition of approximately 90,000 total square feet of ornately designed and carefully crafted space, with a seated capacity of 650 people — a significant increase from the 200-person seated capacity in the East Room of the White House.

In recent weeks, President Trump has held several meetings with members of the White House Staff, the National Park Service, the White House Military Office, and the United States Secret Service to discuss design features and planning.

President Trump has chosen McCrery Architects as lead architect, which is well-known for their classical architectural design and based in our nation's capital. CEO Jim McCrery said: "Presidents in the modern era have faced challenges hosting major events at the White House because it has been untouched since President Harry Truman. I am honored that President Trump has entrusted me to help bring this beautiful and necessary renovation to The People's House, while preserving the elegance of its classical design and historical importance."

The construction team will be headed by Clark Construction, and the engineering team will be led

by AECOM.

The project will begin in September 2025, and it is expected to be completed long before the end of President Trump’s term.

President Trump, and other patriot donors, have generously committed to donating the funds necessary to build this approximately \$200 million dollar structure. The United States Secret Service will provide the necessary security enhancements and modifications.

The White House Ballroom will be substantially separated from the main building of the White House, but at the same time, it’s theme and architectural heritage will be almost identical. The site of the new ballroom will be where the small, heavily changed, and reconstructed East Wing currently sits. The East Wing was constructed in 1902 and has been renovated and changed many times, with a second story added in 1942.

The White House Chief of Staff Susie Wiles said the following: “President Trump is a builder at heart and has an extraordinary eye for detail. The President and the Trump White House are fully committed to working with the appropriate organizations to preserving the special history of the White House while building a beautiful ballroom that can be enjoyed by future Administrations and generations of Americans to come.”

The White House will continue to provide the American public with updates on this project at whitehouse.gov/visit.

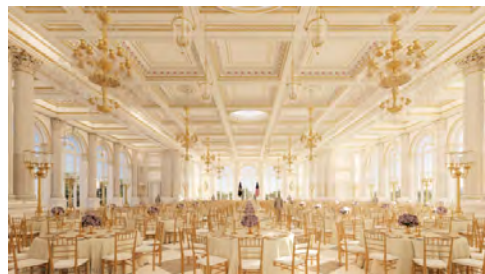




EXHIBIT B



Donald J. Trump  
@realDonaldTrump

This beautiful building will be, when complete, the much anticipated White House Ballroom — The Greatest of its kind ever built! It is a rendering from the Treasury Building, directly across the street, and replaces the very small, dilapidated, and rebuilt many times, East Wing, with a magnificent New East Wing, consisting of a glorious Ballroom that has been asked for by Presidents for over 150 years. Being an identical height and scale, it is totally in keeping with our historic White House. This is the first rendering shown to the Public. If you notice, the North Wall is a replica of the North Facade of the White House, shown at the right hand side of the picture. This space will serve our Country well for, hopefully, Centuries into the future! PRESIDENT DONALD J. TRUMP



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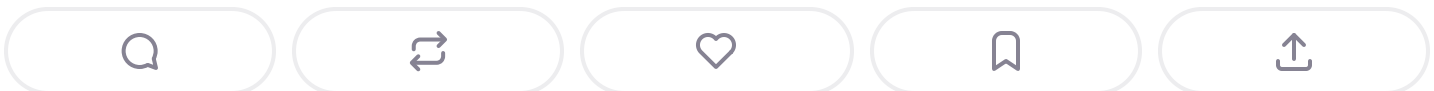


EXHIBIT C



PRESIDENTIAL ACTIONS

Celebrating America's 250th Birthday

The White House

January 29, 2025

By the authority vested in me as President by the Constitution and the laws of the United States of America, and in anticipation of the 250th anniversary of American Independence on July 4, 2026, it is hereby ordered:

Section 1. Purpose. It is the policy of the United States, and a purpose of this order, to provide a grand celebration worthy of the momentous occasion of the 250th anniversary of American Independence on July 4, 2026. It is also the purpose of this order to take other actions to honor the history of our great Nation.

Sec. 2. Establishing the White House Task Force on Celebrating America's 250th Birthday. (a)

There is hereby established the White House Task Force on Celebrating America's 250th Birthday (Task Force 250).

(b) The President shall be the Chair of Task Force 250 and the Vice President will serve as Vice Chair. The Chair shall appoint an Executive Director, who shall administer and execute the day-to-day operations of Task Force 250, and who shall report through the Assistant to the President for Domestic Policy. The Chair, the Vice Chair, or a member of Task Force 250 designated by the Chair, shall convene regular meetings of Task Force 250, determine its agenda, and direct its work, consistent with this order. The Executive Director and the Assistant to the President for Domestic Policy shall assist in the performance of these duties. The Chair may designate any member of the Task Force to preside over meetings of the Task Force.

(c) In addition to the Chair and Vice Chair, Task Force 250 shall consist of the following members:

- (i) the Secretary of State;
- (ii) the Secretary of the Treasury;
- (iii) the Secretary of Defense;
- (iv) the Secretary of the Interior;
- (v) the Secretary of Agriculture;
- (vi) the Secretary of Housing and Urban Development;
- (vii) the Secretary of Education;
- (viii) the Assistant to the President for Domestic Policy;
- (ix) the Deputy Chief of Staff for Legislative Affairs;
- (x) the Cabinet Secretary and Deputy Chief of Staff;
- (xi) the Director of Speechwriting;
- (xii) the Chair of the National Endowment for the Humanities;
- (xiii) the Chair of the National Endowment for the Arts;
- (xiv) the Director of the Institute of Museum and Library Services; and
- (xv) the heads of such other executive departments, agencies, and offices that the Chair or the Vice Chair may, from time to time, designate or invite to participate.

(d) The Chair and the Vice Chair, as they deem appropriate, shall invite the Executive Director of the United States Semiquincentennial Commission to provide recommendations and advice to Task Force 250.

(e) Task Force 250 shall coordinate with the executive departments and agencies (agencies) to plan, organize, and execute an extraordinary celebration of the 250th Anniversary of American Independence and shall coordinate agencies' communications with the United States Semiquincentennial Commission. In addition, the Executive Director may seek information or advice from such other agencies as Task Force 250 shall direct.

(f) For administrative purposes, the Task Force shall be housed in the Department of Defense, which shall provide funding and administrative support for Task Force 250, to the extent permitted by law and subject to the availability of appropriations.

(g) Agencies shall provide a report to Task Force 250 regarding their respective planning and activities with respect to the celebration of the 250th Anniversary of American Independence.

These reports should be submitted to the Executive Director of Task Force 250 no later than March 1, 2025.

(h) Task Force 250 shall terminate on December 31, 2026, unless extended by the President.

Sec. 3. National Garden of American Heroes. (a) Executive Order 13934 of July 3, 2020 (Building and Rebuilding Monuments to American Heroes) and Executive Order 13978 of January 18, 2021 (Building the National Garden of American Heroes) are reinstated as they were prior to issuance of Executive Order 14029 of May 14, 2021.

(b) The Assistant to the President for Domestic Policy shall recommend to the President additional historically significant Americans for inclusion in the National Garden of American Heroes, to bring the total number of heroes to 250.

(c) Section 3(c)(ii) of Executive Order 13934 is amended by striking “prior to the 250th anniversary of the proclamation of the Declaration of Independence on July 4, 2026” and inserting in its place “as expeditiously as possible”.

Sec. 4. Protecting America’s Monuments from Vandalism. Executive Order 13933 of June 26, 2020 (Protecting American Monuments, Memorials, and Statues and Combatting Recent Criminal Violence) is hereby reinstated as it was prior to the issuance of Executive Order 14029 of May 14, 2021. Recent examples of conduct necessitating reinstatement of this order include pro-Hamas-related vandalism of historically significant public monuments and related assaults on Federal officers and employees following October 7, 2023, including the vandalism of the exterior of the Department of the Treasury and of statues in Lafayette Square in Washington, D.C. on June 8, 2024, and the assaults on Federal officers and vandalism of the Christopher Columbus Memorial Fountain and Freedom Bell at Union Station in Washington, D.C. on July 24, 2024.

Sec. 5. General Provisions. (a) Nothing in this order shall be construed to impair or otherwise affect:

(i) the authority granted by law to an executive department or agency, or the head thereof; or
(ii) the functions of the Director of the Office of Management and Budget relating to budgetary, administrative, or legislative proposals.

(b) This order shall be implemented consistent with applicable law and subject to the availability of appropriations.

(c) This order is not intended to, and does not, create any right or benefit, substantive or procedural, enforceable at law or in equity by any party against the United States, its departments, agencies, or entities, its officers, employees, or agents, or any other person.

Related


Fact Sheet: President Donald J. Trump Previews Plans for the Grandest Celebration of America’s Birthday

Fact Sheets | July 3, 2025

EXHIBIT D



← Post

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EXHIBIT E



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PRESIDENT TRUMP APPOINTS KEITH KRACH CEO OF FREEDOM 250, LEADING AMERICA'S 250TH BIRTHDAY CELEBRATION

12.22.2025 2 min read



**FREEDOM 250 WILL UNITE AMERICANS FROM EVERY CORNER OF THE NATION
AROUND ONE SHARED MISSION –
CELEBRATING THE TRIUMPH OF THE AMERICAN SPIRIT.**

WASHINGTON, DC – President Donald J. Trump today announced the launch of **Freedom 250**, a national, non-partisan organization leading the Administration's celebration of America's 250th birthday. Fulfilling the President's promise to deliver the most extraordinary commemoration in American history, Freedom 250 will coordinate with the Task Force, federal departments, and the Commission to deliver the defining presidential moments of this anniversary year.

Freedom 250 is a national movement uniting Americans and allies around the world in Celebration of the Triumph of the American Spirit. Its mission is to showcase America at its best — courageous, generous,

See Keith's latest work at

[Krach Institute for Tech Diplomacy at Purdue](#)

**KEITH
KRACH**



Keith Krach, former Under Secretary of State, technology entrepreneur, and Chairman of the Krach Institute for Tech Diplomacy at Purdue, was named the Freedom 250 Chief Executive Officer.

“2026 will mark a celebration of America unlike anything we have ever done and I am grateful to President Trump for the opportunity to execute his vision for Freedom 250,” said Keith Krach, CEO of Freedom 250. “By working alongside states, businesses, and organizations across the country, Freedom 250 will reignite the pioneering spirit that defines America to strengthen the foundation for the next 250 years of independence, opportunity, and freedom.”

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GOVERNMENT OF THE
DISTRICT OF COLUMBIA
MURIEL BOWSER, MAYOR

**District of Columbia Government
Corporations Division**

Foreign Registration Form Statement FN-1, Ver. 3, February 2020.

Under the provisions of the Title 29 of D.C. Code (Business Organizations Act), the foreign filing entity listed below hereby applies for a Certificate of Registration to transact business in the District of Columbia, and for that purpose submits the statement below.

First: Entity Name:
Freedom 250 LLC

Second: Entity Type: Foreign Limited Liability Company

Third: Entity's Alternate Name (if true legal name is not available):
Freedom 250 LLC

Fourth: Organized under the laws of which state or country:
Delaware, United States

Fifth: Date of Organization: 10/28/2025 12:00 AM

Sixth: Date entity started or will start transacting business in the District of Columbia: 11/18/2025

Seventh: Principal Address:
1500 K Street NW, Suite 700
Washington, District of Columbia 20005

Eighth: Registered Agent's name and address of registered office in District of Columbia:
REGISTERED AGENTS INC.
1717 N STREET NW, SUITE 1
Washington, District of Columbia 20036
Email: eastern@registeredagentsinc.com

Ninth: Briefly describe the proposed activity company will transact in the District of Columbia:
Other
Support & promote the activities of the National Parks Foundation

Tenth: State the names and addresses of all beneficial owners (member, manager, officer, director, shareholder, partner, trustee, etc.) that have interest or control over this entity (review instruction sheet for more information).

Name	Address
Ruth Hernandez Prescott	1500 K Street NW, Suite 700, Washington, District of Columbia 20005

Eleventh: Attach an original Certificate of Good Standing (Certificate of Existence) from Registration Authority in the State/Province/Country of Incorporation that is not over 90 days old.

If you sign this form you agree that anyone who makes a false statement can be punished by criminal penalties of a fine up to \$1000, imprisonment up to 180 days, or both, under DCOC § 22-2405;

Twelfth: Name of the Governor or Authorized Person:
Ruth Hernandez Prescott

Amount Paid: \$220.00

Date: 11/21/2025 1:07 PM

E-Signed

EXHIBIT G



FACT SHEETS

Fact Sheet: President Donald J. Trump Celebrates American Greatness with the Freedom 250 Grand Prix of Washington, D.C.

The White House

January 30, 2026

CELEBRATING AMERICAN GREATNESS WITH AMERICAN MOTOR RACING: Today, President Donald J. Trump signed an Executive Order launching the Freedom 250 Grand Prix of Washington, D.C. – the first ever INDYCAR street race in the Nation’s capital, to be held near the National Mall in honor of America’s 250th birthday.

- The Order directs the Department of the Interior and the Department of Transportation to designate a suitable race route that showcases the majesty of Washington, D.C., and its iconic national monuments.
- The Order instructs the Secretary of the Interior and Secretary of Transportation to issue all necessary permits, approvals, and authorizations as expeditiously as possible to plan, prepare for, and conduct the race.
- The Secretary of Transportation is authorized to use available funds to facilitate the race and coordinate with the FAA to permit unmanned aircraft systems and aerial photography to enhance public enjoyment without compromising nearby Government facilities.
- The Order directs the Administration to coordinate with the Mayor of Washington, D.C. to ensure that any roads, trails, or bridges are properly maintained and capable of being used as part of the race course.

SHOWCASING AMERICA’S MOTORSPORT LEGACY: President Trump is bringing world-class American motor racing to the heart of the Nation’s capital to celebrate our history, inspire future generations, and highlight the enduring spirit of American innovation and achievement.

- American INDYCAR racing has thrilled Americans for over a century, producing legends like A.J. Foyt and Mario Andretti and drawing global attention to the Indianapolis 500 each Memorial Day weekend.

- The Freedom 250 Grand Prix will be the first motor race ever held in our Nation’s capital near the National Mall, uniting Americans in celebration of our 250th anniversary of independence.
- The race will showcase the beauty and grandeur of Washington, D.C., while demonstrating the power of American ingenuity in engineering, technology, and high-performance racing.

HONORING AMERICA’S PAST AND BUILDING ITS FUTURE: President Trump is fulfilling his campaign promise to “give America’s founding in 1776 the incredible anniversary it truly deserves.”

- President Trump kicked off the year by projecting America’s story on the Washington Monument.
- He has prioritized planning events that showcase American greatness, including the Great American State Fair, the brand-new Patriot Games, and a UFC fight at the White House.
- President Trump is following through on his promise to bring back the National Garden of American Heroes to honor the greatest Americans of all time.
- He announced plans for a new Independence Arch in Washington, D.C. to coincide with the 250th anniversary.

Related

Celebrating American Greatness with American Motor Racing

Presidential Actions, Executive Orders | January 30, 2026

Fact Sheet: President Donald J. Trump Previews Plans for the Grandest Celebration of America’s Birthday

Fact Sheets | July 3, 2025

Celebrating America’s 250th Birthday

Presidential Actions | January 29, 2025

Fact Sheet: President Donald J. Trump Restores the United States Department of War

Fact Sheets | September 5, 2025

Fact Sheet: President Donald J. Trump Restores Truth and Sanity to American History

Fact Sheets | March 27, 2025

EXHIBIT H

Freedom 250 Network

The Freedom 250 Network brings together partners at home and abroad, including the entire federal government, to honor our Nation's past and build the Golden Age of Opportunity for the next 250 years.



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