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Morgan Lewis

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President Donald J. Trump
1600 Pennsylvania Avenue, NW
Washington, DC 20500

Re: Transactions with Russian counterparties reported on your U.S. federal income tax returns

Dear President Trump:

We, Sheri Dillon and William Nelson, have served as tax counsel to you and The Trump Organization (“TTO”) continuously since 2005. As such, we are familiar with your U.S. federal income tax returns and with transactions that are reported on your returns. In this capacity, you have asked us to review your returns for the past 10 years. Following such review, we hereby confirm the following facts:

As disclosed in your most recent Executive Branch Personnel Financial Disclosure Report (OGE Form 278e), filed on May 16, 2016, you hold interests as the sole or principal owner in more than 500 separate entities. These entities are collectively referred to and do business as TTO. Because you operate these businesses almost exclusively through sole proprietorships, S-corporations, and/or partnerships, your personal federal income tax returns reflect income that is earned by these entities and interest that is paid or received by these entities, as well as income that you directly earned or interest that you paid or received.

With a few exceptions – as detailed below – your tax returns do not reflect (1) any income of any type from Russian sources, (2) any debt owed by you or TTO to Russian lenders or any interest paid by you or TTO to Russian lenders, (3) any equity investments by Russian persons or entities in entities controlled by you or TTO, or (4) any equity or debt investments by you or TTO in Russian entities. The exceptions are: (1) in 2013, the Miss Universe pageant was held in Moscow, and of the \$12.2 million of foreign income that it earned that year, a substantial portion of it was attributable to the Moscow event; (2) in 2008, Trump Properties LLC sold an estate in Florida, that it had acquired in 2005 for approximately \$41 million, to a Russian billionaire for \$95 million; and (3) over the years, it is likely that TTO or third-party entities engaged in ordinary course sales of goods or services to Russians or Russian entities, such as sales / rentals / fees for condominiums, hotel rooms, rounds of golf, books or Trump-licensed products (e.g., ties, mattresses, wine, etc.) that could have produced income attributable to Russian sources (such income would not have been separately identified as “Russian” in your books and records and therefore not separately reflected on your tax returns). With respect to this last exception, the amounts are immaterial.

Regards,



Sheri A. Dillon



William F. Nelson