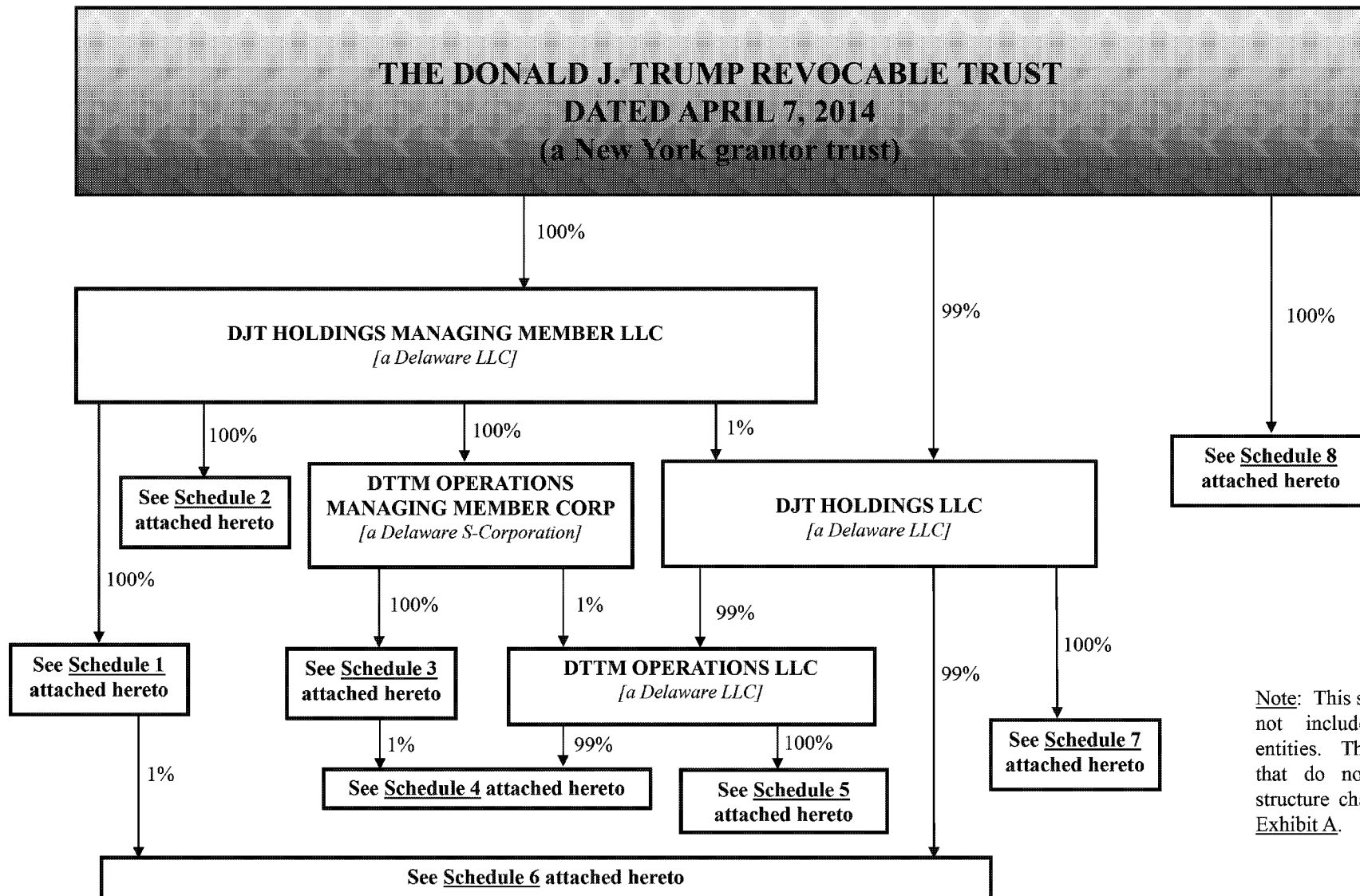


# Verified Complaint

## Exhibit # 2



Note: This structure chart does not include all subsidiary entities. The entity structures that do not fit within this structure chart are attached as Exhibit A.

As of January 20, 2017

**Schedule 1**

Entities in which DJT Holdings Managing Member LLC holds a 100% interest, each of which is a Managing Member with a 1% interest of the applicable entity listed on Schedule 6

4 Shadow Tree Lane Member Corp  
809 North Canon Member Corporation  
D B Pace Acquisition Member Corp  
The Caribusiness RE Corp  
DT Dubai Golf Manager Member Corp  
DT Tower I Member Corp  
DTTM Operations Managing Member Corp  
Excel Venture I Corporation  
Golf Productions Member Corp  
Jupiter Golf Club Managing Member Corp  
LFB Acquisition Member Corp  
Mobile Payroll Construction Manager Corp  
Panama Ocean Club Management Member Corp  
Pine Hill Development Managing Member Corp  
THC Baku Hotel Manager Services Member Corp  
THC Baku Services Member Corp  
THC Central Reservations Member Corp  
THC China Technical Services Manager Corp  
THC Development Brazil Managing Member Corp  
THC Miami Restaurant Hospitality Member Corp  
THC Qatar Hotel Manager Member Corp  
THC Rio Managing Member Corp  
THC Sales & Marketing Member Corp  
THC Services Shenzhen Member Corp  
THC Shenzhen Hotel Manager Member Corp  
The Trump Follies Member Inc.

Schedule 1

As of January 20, 2017

TNGC Charlotte Manager Corp  
TNGC Dutchess County Member Corp  
TNGC Jupiter Managing Member Corp  
TNGC Pine Hill Member Corp  
Trump Books Manager Corp  
Trump Canouan Estate Member Corp  
Trump Carousel Member Corp  
Trump Chicago Commercial Member Corp  
Trump Chicago Hotel Member Corp  
Trump Chicago Residential Member Corp  
Trump Chicago Retail Member Corp  
Trump Development Services Member Corp  
Trump Drinks Israel Member Corp  
Trump Endeavor 12 Manager Corp  
Trump Florida Manager Corp  
Trump Golf Coco Beach Member Corp  
Trump International Development Member Corp  
Trump International Golf Club, Inc.  
Trump Las Olas Member Corp  
Trump Marks Asia Corp  
Trump Miami Resort Management Member Corp  
Trump National Golf Club Colts Neck Member Corp  
Trump National Golf Club Member Corp  
Trump National Golf Club Washington DC Member Corp  
Trump Panama Condominium Member Corp  
Trump Panama Hotel Management Member Corp  
Trump Productions Managing Member Inc.  
Trump Sales & Leasing Chicago Member Corp  
Trump Scotsborough Square Member Corp

Schedule 1

As of January 20, 2017

Trump Vineyard Estates Manager Corp  
Trump Virginia Acquisitions Manager Corp  
Trump Virginia Lot 5 Manager Corp  
Trump World Productions Manager Corp  
Turnberry Scotland Managing Member Corp  
TW Venture I Managing Member Corp  
TW Venture II Managing Member Corp  
Unit 2502 Enterprises Corp  
White Course Managing Member Corp

Schedule 1

As of January 20, 2017

**Schedule 2****Entities in which DJT Holdings Managing Member LLC holds a 100% interest  
and which do not meet the requirements of Schedule 1**

Aviation Payroll Company  
Briarcliff Properties, Inc.  
Development Member Inc.  
DJT Land Holdings Member Corp  
DT Bali Hotel Manager Member Corp  
DT Bali Manager Member Corp  
DT Bali Technical Services Manager Member Corp  
DT Dubai II Golf Manager Member Corp  
DT Lido Golf Manager Member Corp  
DT Lido Hotel Manager Member Corp  
DT Lido Technical Services Manager Member Corp  
DTW Venture Managing Member Corp  
Flights Inc.  
Helicopter Air Services Inc.  
Mar-a-Lago Club Inc  
OPO Hotel Manager Member Corp  
Parc Consulting, Inc.<sup>1</sup>  
Reg-Tru Equities, Ltd  
RPV Development LLC  
THC Vancouver Management Corp  
The Trump Hotel Corp  
The Trump Organization, Inc.  
TIGL Common Area Management Corp  
TIHM Member Corp

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<sup>1</sup> Board to consist of at least three directors. Two are independent directors in place before the restructuring.

As of January 20, 2017

Trump Central Park West Corp  
Trump Empire State Inc.  
Trump Las Vegas Corp  
Trump Las Vegas Sales & Marketing, Inc.  
Trump Pageants, Inc.  
Trump Payroll Corp  
Trump Scotland Member Inc.  
Trump Toronto Development Inc.  
Trump Toronto Hotel Management Corp  
Ultimate Air Corp  
Travel Enterprises Management Inc.

As of January 20, 2017

**Schedule 3**

Entities in which DTTM Operations Managing Member Corp holds a 100% interest, each of which may be a Managing Member with a 1% interest of the applicable entity listed on Schedule 4

C Development Ventures Member Corp

DT App Warrant Holding Managing Member Corp

DT Endeavor I Member Corp

DT Home Marks International Member Corp

DT India Venture Managing Member Corp

DT Marks Baku Managing Member Corp

DT Marks Bali Member Corp

DT Marks Dubai Member Corp

DT Marks Gurgaon Managing Member Corp

DT Marks Lido Member Corp

DT Marks Products International Member Corp

DT Marks Pune II Managing Member Corp

DT Marks Pune Managing Member Corp

DT Marks Qatar Member Corp

DT Marks Rio Member Corp

DT Marks Vancouver Member Corp

DT Marks Worli Member Corp

DT Tower II Member Corp

DT Tower Kolkata Managing Member Corp

DT Venture I Member Corp

DT Venture II Member Corp

EID Venture I Corporation

Poker Venture Managing Member Corp

THC Venture II Managing Member Corp

The Trump Marks Real Estate Corp

Schedule 3



As of January 20, 2017

Trump AC Casino Marks Member Corp  
Trump EU Marks Member Corp  
Trump Home Marks Member Corp  
Trump Marks Atlanta Member Corp  
Trump Marks Batumi Managing Member Corp  
Trump Marks Canouan Managing Member Corp  
Trump Marks Chicago Member Corp  
Trump Marks Dubai Corp  
Trump Marks Egypt Corp  
Trump Marks Fine Foods Member Corp  
Trump Marks Ft Lauderdale Member Corp  
Trump Marks GP Corp  
Trump Marks Hollywood Corp  
Trump Marks Istanbul II Corp  
Trump Marks Jersey City Corp  
Trump Marks Las Vegas Corp  
Trump Marks Mattress Member Corp  
Trump Marks Menswear Member Corp  
Trump Marks Mortgage Corp  
Trump Marks Mumbai Member Corp  
Trump Marks New Rochelle Corp  
Trump Marks Palm Beach Corp  
Trump Marks Panama Corp  
Trump Marks Philippines Corp  
Trump Marks Products Member Corp  
Trump Marks Puerto Rico I Member Corp  
Trump Marks Punta Del Este Manager Corp  
Trump Marks Soho License Corp  
Trump Marks Stamford Corp

Schedule 3

As of January 20, 2017

Trump Marks Sunny Isles I Member Corp

Trump Marks Sunny Isles II Member Corp

Trump Marks Tampa Corp

Trump Marks Toronto Corp

Trump Marks Westchester Corp

Trump Marks White Plains Corp

As of January 20, 2017

**Schedule 4**

Entities in which DTTM Operations LLC holds a 99% interest  
and in which the applicable Schedule 3 entity holds a 1% interest

C Development Ventures LLC  
DT App Warrant Holding LLC  
DT Home Marks International LLC  
DT India Venture LLC  
DT Marks Baku LLC  
DT Marks Bali LLC  
DT Marks Dubai LLC  
DT Marks Gurgaon LLC  
DT Marks Lido LLC  
DT Marks Products International LLC  
DT Marks Pune II LLC  
DT Marks Pune LLC  
DT Marks Qatar LLC  
DT Marks Rio LLC  
DT Marks Vancouver LP  
DT Marks Worli LLC  
DT Tower II LLC  
DT Tower Kolkata LLC  
EID Venture I LLC  
Poker Venture LLC  
THC Venture II LLC  
Trump AC Casino Marks LLC  
Trump EU Marks LLC  
Trump Home Marks LLC  
Trump Marks Atlanta LLC

Schedule 4

As of January 20, 2017

Trump Marks Batumi LLC  
Trump Marks Canouan LLC  
Trump Marks Chicago LLC  
Trump Marks Dubai LLC  
Trump Marks Egypt LLC  
Trump Marks Fine Foods LLC  
Trump Marks Ft Lauderdale LLC  
Trump Marks Holdings L.P.  
Trump Marks Hollywood LLC  
Trump Marks Istanbul II LLC  
Trump Marks Jersey City LLC  
Trump Marks Las Vegas LLC  
Trump Marks Mattress LLC  
Trump Marks Menswear LLC  
Trump Marks Mtg LLC  
Trump Marks Mumbai LLC  
Trump Marks New Rochelle LLC  
Trump Marks Palm Beach LLC  
Trump Marks Panama LLC  
Trump Marks Philippines LLC  
Trump Marks Products LLC  
Trump Marks Puerto Rico I LLC  
Trump Marks Punta Del Este LLC  
Trump Marks Real Estate LLC  
Trump Marks SoHo LLC  
Trump Marks Stamford LLC  
Trump Marks Sunny Isles I LLC  
Trump Marks Sunny Isles II LLC

Schedule 4

As of January 20, 2017

Trump Marks Tampa LLC

Trump Marks Toronto LLC

Trump Marks Westchester LLC

Trump Marks White Plains LLC

Schedule 4

As of January 20, 2017

**Schedule 5**

**Entities in which DTTM Operations LLC holds a 100% interest**

DT Marks Jersey City LLC

DT Marks Jupiter LLC

Schedule 5

As of January 20, 2017

**Schedule 6**

Entities in which DJT Holdings LLC holds a 99% interest  
and in which the applicable Schedule 1 entity holds a 1% interest

4 Shadow Tree Lane LLC  
809 North Canon LLC  
Caribusiness MRE LLC  
D B Pace Acquisition, LLC  
DT Dubai Golf Manager LLC  
DT Tower I LLC  
DTTM Operations LLC  
Excel Venture I LLC  
Golf Productions LLC  
Jupiter Golf Club LLC  
LFB Acquisition LLC  
Mobile Payroll Construction LLC  
Panama Ocean Club Management LLC  
Pine Hill Development LLC  
THC Baku Hotel Manager Services LLC  
THC Baku Services LLC  
THC Barra Hotelaria Ltda.  
THC Central Reservations LLC  
THC China Technical Services LLC  
THC Development Brazil LLC  
THC Miami Restaurant Hospitality LLC  
THC Qatar Hotel Manager LLC  
THC Rio Manager LLC  
THC Sales & Marketing LLC

Schedule 6

As of January 20, 2017

THC Services Shenzhen LLC  
THC Shenzhen Hotel Manager LLC  
The Trump Follies LLC  
TNGC Charlotte LLC  
TNGC Dutchess County LLC  
TNGC Jupiter Management LLC  
TNGC Pine Hill LLC  
Trump Books LLC  
Trump Canouan Estate LLC  
Trump Carousel LLC  
Trump Chicago Commercial Manager LLC  
Trump Chicago Hotel Manager LLC  
Trump Chicago Residential Manager LLC  
Trump Chicago Retail Manager LLC  
Trump Development Services LLC  
Trump Drinks Israel LLC  
Trump Endeavor 12 LLC  
Trump Florida Management LLC  
Trump Golf Coco Beach LLC  
Trump International Development LLC  
Trump International Golf Club Scotland Limited  
Trump Las Olas LLC  
Trump Marks Asia LLC  
Trump Miami Resort Management LLC  
Trump National Golf Club Colts Neck LLC  
Trump National Golf Club LLC  
Trump National Golf Club Washington DC LLC  
Trump Panama Condominium Management LLC

Schedule 6



As of January 20, 2017

Trump Panama Hotel Management LLC

Trump Productions LLC

Trump Sales & Leasing Chicago LLC

Trump Scotsborough Square LLC

Trump Vineyard Estates LLC

Trump Virginia Acquisitions LLC

Trump Virginia Lot 5 LLC

Trump World Productions LLC

Turnberry Scotland LLC

TW Venture I LLC

TW Venture II LLC

Unit 2502 Enterprises LLC

White Course LLC

Schedule 6

As of January 20, 2017

**Schedule 7****Entities in which DJT Holdings LLC holds a 100% interest**

81 Pine Note Holder Inc.  
Ace Entertainment Holdings Inc.  
Bedford Hills Corp.  
Chicago Unit Acquisition LLC  
China Trademark LLC  
DJ Aerospace (Bermuda) Limited<sup>2</sup>  
DJT Entrepreneur Managing Member LLC  
DJT Entrepreneur Member LLC  
DT Venture I LLC  
DT Venture II LLC  
DTW Venture LLC  
Florida Properties Management LC  
Indian Hills Holdings LLC  
Lamington Family Holdings LLC  
Ocean Development Member Inc.  
OWO Developer LLC  
Scotland Acquisitions LLC  
THC Hotel Development LLC  
TIHC Reservations LLC  
TIHT Chicago Member Acquisition LLC  
TIHT Holding Company LLC  
TMG Member, LLC  
Toronto Development LLC  
Trump 106 CPS LLC

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<sup>2</sup> Entity also includes independent directors.

Schedule 7

As of January 20, 2017

Trump Acquisition Corp  
Trump Brazil LLC  
Trump Caribbean LLC  
Trump Chicago Development LLC  
Trump Chicago Managing Member LLC  
Trump Chicago Member LLC  
Trump Golf Acquisitions LLC  
Trump Golf Management LLC  
Trump Ice Inc.  
Trump Ice LLC  
Trump Korean Projects LLC  
Trump Las Vegas Development LLC  
Trump Lauderdale Development LLC  
Trump Lauderdale Development No 2 LLC  
Trump Marketing LLC  
Trump Organization LLC  
Trump Phoenix Development LLC  
Trump Realty Services LLC  
Trump Restaurants LLC  
Trump Riverside Management LLC  
Trump Soho Member LLC  
Trump World Publications LLC  
West Palm Operations LLC  
Wollman Rink Operation LLC  
Yorktown Real Estate LLC

Schedule 7

As of January 20, 2017

**Schedule 8**

Entities in which The Donald J. Trump Revocable Trust dated April 7, 2014  
holds a 100% interest

DJT Aerospace LLC  
DJT Operations I LLC  
DJT Operations II LLC  
DT Connect II Member Corp  
DT Endeavor I LLC  
EID Venture II Member Corp  
Fifty-Seven Management Corp  
First Member Inc  
Plaza Consulting Corp  
Storage 106 LLC  
The Donald J. Trump Company LLC  
The Trump Corporation  
TIHH Member Corp  
TIHH Member LLC  
TIHT Member LLC  
Tipperary Realty Corp.  
Trump 845 LP LLC  
Trump 845 UN Mgr Corp  
Trump 845 UN MGR LLC  
Trump Canadian Services, Inc.  
Trump CPS Corp  
Trump Delmonico LLC  
Trump Ferry Point Member Corp  
Trump Marks Philadelphia Corp  
Trump Marks Waikiki Corp

Schedule 8

As of January 20, 2017

Trump Park Avenue Acquisition LLC

Trump Plaza Member Inc<sup>3</sup>

Trump Tower Managing Member Inc.<sup>4</sup>

Trump's Castle Management Corp

TTTT Venture Member Corp

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<sup>3</sup> One independent director in place before the restructuring.

<sup>4</sup> Two independent directors in place before the restructuring.

As of January 20, 2017

**Exhibit A****Description of Alternative Structures**

(where available, specific structure charts may be attached at the end of this exhibit)

**1. Fred Trump Entities**

- All County Building Supply & Maintenance Corp.
- Beach Haven Apartments #3 LLC
- Beach Haven Apt#1, Inc.
- Beach Haven Mgt. Corp.
- Beach Haven Shopping Center LLC
- Chelsea Hall LLC
- Clyde Hall, Inc.
- Coronet Hall, Inc.
- Country Apartments, LLC
- Country Investors LLC
- Country Properties, LLC
- Fountainbleu Apartments LLC
- Highlander Hall, Inc.
- Lawrence Towers Apartments LLC
- Midland Associates
- Oakdale Investors
- Ocean Air Investors
- Park Briar Associates
- Shore Haven Apt#1, Inc.
- Shore Haven Management Corp.
- Shore Haven Shopping Center LLC
- Sussex Hall, Inc.
- Trump Management Inc.
- Trump Village Construction Corp
- Wexford Hall Inc
- Wilshire Hall LLC

**2. Vornado Entities**

- Hudson Waterfront Associates I, LP
- Hudson Waterfront Associates II, LP
- Hudson Waterfront Associates III, LP
- Hudson Waterfront Associates IV, LP
- Hudson Waterfront Associates V, LP
- Hudson Waterfront Associates, LP
- HWA 556 Owners, LLC

Exhibit A

As of January 20, 2017

- 1290 Avenue of the Americas, a Tenancy-in-Common
- HWA 1290 III LLC
- HWA 1290 IV LLC
- HWA 1290 V LLC

### **3. Other Investments with Outside Holders**

#### **A. TTTT Ventures and Subsidiaries**

- TTTT Venture LLC
- DT Bali Golf Manager LLC
- DT Bali Hotel Manager LLC
- DT Bali Technical Services Manager LLC
- DT Dubai II Golf Manager LLC
- DT Lido Golf Manager LLC
- DT Lido Hotel Manager LLC
- DT Tower Gurgaon LLC
- DT Lido Technical Services Manager LLC
- TC Marks Buenos Aires LLC

#### **B. Donald J. Trump Enterprises (vehicles for trust planning that have since been superseded)**

- Donald J. Trump Enterprises LLC
- Donald J. Trump Enterprises II LLC
- Donald J. Trump Enterprises III LLC

#### **C. Trump Model Management**

- Trump Model Management LLC

#### **D. Trump U**

- The Trump Entrepreneur Initiative LLC (NY)
- The Trump Entrepreneur Initiative LLC (DE)
- Trump Education ULC

### **4. Specific Real Estate Locations**

#### **A. Trump Tower (725 Fifth Avenue)**

- The Trump-Equitable Fifth Avenue Company
- Trump Tower Commercial LLC
- Fifty-Seventh Street Associates LLC

#### **B. 40 Wall Street**

- 40 Wall Development Associates, LLC

Exhibit A

As of January 20, 2017

- 40 Wall Street Commercial LLC
  - 40 Wall Street LLC
  - 40 Wall Street Member Corp<sup>5</sup>
- C. Trump Park Avenue (502 Park Avenue)
- Trump Park Avenue LLC<sup>6</sup>
- D. Trump World Tower (845 United Nations Plaza)
- 845 UN Limited Partnership
  - Trump 845 UN GP LLC
- E. Trump International Hotel and Tower Condominium (One Central Park West)
- One Central Park West Associates
  - One Central Park West PT Associates
- F. Old Post Office
- Trump Old Post Office LLC
  - Trump Old Post Office Member Corp
  - OPO Hotel Manager LLC
  - THC DC Restaurant Hospitality LLC
- G. Trump International Hotel & Tower Chicago
- 401 Mezz Venture LLC
  - 401 North Wabash Venture LLC
  - Trump Chicago Retail LLC
  - Trump Commercial Chicago LLC
  - Trump Payroll Chicago LLC
- H. Trump International Hotel Las Vegas
- Trump Las Vegas Member LLC
  - Trump Las Vegas Managing Member LLC
  - Trump Ruffin LLC
  - Trump Ruffin Tower I LLC<sup>7</sup>
  - Trump Ruffin Commercial LLC
- I. Trump National Golf Club Los Angeles
- VH Property Corp
  - VHPS LLC

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<sup>5</sup> Board to consist of at least 3 directors. Two are independent directors in place before the restructuring.

<sup>6</sup> One independent director in place before the restructuring.

<sup>7</sup> Two independent directors in place before the restructuring.

Exhibit A



As of January 20, 2017

## J. Turnberry

- Golf Recreation Scotland Limited
- Nitto World Co., Limited
- SLC Turnberry Limited
- DT Connect Europe Limited

## K. Doonbeg

- TIGL Ireland Enterprises Limited
- TIGL Ireland Management Limited
- Doonbeg Common Areas Management Limited
- Links Common Areas Management Company Limited

## 5. Entities with other Unique Structures

## A. Owners and/or Percentages Differ from Chart: Split ownership that is not 99/1 or ownership outside "Holdings-HMM" or "DTTM-DTTM MM" structure

- Briar Hall Operations LLC (split is 99.9/0.1)
- DT Connect II LLC (split is 99/1 and both the entity and its 1% managing member are under the Trust)
- DT Tower Gurgaon Managing Member Corp (100% owned by DTTM MM and owns a 1% interest in an entity this is under TTTT Venture LLC)
- EID venture II LLC (split is 99/1 and both the entity and its 1% managing member are directly under the Trust)
- Mar-a-Lago Club, LLC (Split is 99.99/0.01. Entity is member managed)
- Miss Universe L.P., LLLP (split is 98/2)
- Seven Springs LLC (split is 99.9/0.01)
- Trump Park Avenue LLC (owned by three separate entities, including one outside entity)
- The East 61 Street Company LP (owned 99.9/0.1 with the bulk going to the Trust)
- T International Realty LLC (split with other Trump family members (originally 55/45 but now 60/40 following Ivanka's withdrawal))
- THC Venture I LLC (split is 99/1 where the 99% owner is Holdings and the 1% managing member is THC Venture I Managing Member Corp, which is 100% owned by DTTM MM (not HMM))
- TIHT Commercial LLC (split is 99.99/0.01 between Trust, which is the 99.99% holder and the managing member, and TIHT Member LLC)
- Trump Acquisition LLC (split is 99/1 but the 1% holder (Trump Acquisition Corp) is also under Holdings)
- Trump Briarcliff Manor Development LLC (split is 99.9/0.1)
- Trump CPS LLC (split is 99.9/0.1 and both the entity and its 0.1% managing member (Trump CPS Corp) are directly under the Trust)

Exhibit A

As of January 20, 2017

- Trump Ferry Point LLC (split 99/1 where the 1% managing member is under the Trust instead of HMM)
- Trump International Golf Club, L.C. (split is 99.999/0.001 and the bulk is in the Trust)
- Trump International Hotels Management LLC (split is 99.9/0.1)
- Trump Marks Philadelphia LLC (split is 99/1 and both the entity and its 1% managing member are directly under the Trust)
- Trump Marks Toronto LP (split is 99/1 and both the entity itself and the 1% managing member (Trump Toronto Member Corp) are under DTTM Managing Member)
- Trump Marks Waikiki LLC (split is 99/1 and both the entity and its 1% managing member are directly under the Trust)
- Trump Palace/Parc LLC (split is 99.9/0.1 and the 99.9% owner is the Trust)
- Trump Plaza LLC (split is 99/1 and the 99% owner is the Trust)
- Trump Toronto Member Corp (100% owned by DTTM MM and doesn't own an interest in an entity also owned by DTTM)
- Trump Wine Marks Member Corp (this is owned 100% by DTTM MM, though it does not own anything that is owned 99% by DTTM)
- Trump Wine Marks LLC (split is 99/1 where the 99% owner is Holdings and the 1% managing member is under DTTM MM (not HMM))

B. Indirect Subsidiaries Not Captured by Chart: Other Wholly-Owned Subsidiaries of Other Entities

- Caribusiness Investments, S.R.L.
- Lamington Farm Club, LLC (Bedminster) (owned by LFB Acquisition LLC)
- Tag Air Inc. (owned by DJT Operations II LLC)
- THC China Development LLC (owned by Trump International Hotels Management LLC)
- THC Inea Development LLC (owned by Trump International Hotels Management LLC)
- THC Vancouver Payroll ULC (owned by THC Vancouver Management Corp)
- Trump International Hotel Hawaii LLC
- Trump Korea LLC
- Trump Marks LLC (owned by Trump Marks Holdings LP)
- Trump New World Property Management LLC (owned by New World Property Management Limited and Trump Riverside Management LLC)
- Trump Vineyard Estates Land Owner LLC (owned by Trump Vineyard Estates LLC)

Exhibit A