

President Trump And Special Envoy To The Middle East Steve Witkoff Appear To Be Violating Emoluments Clause Through Tens Of Millions Of Dollars Their Crypto Venture Has Taken From Chinese Billionaire Justin Sun, Prime Minister Of Fledgling Micronation Campaigning For Recognition

SUMMARY: Ethics experts have [warned](#) that the Trump family's cryptocurrency venture World Liberty Financial Inc. (WLFI) could be in violation of the U.S. Constitution's Emoluments Clause, which bars federal officers from accepting gifts or favors from foreign governments and officials. A Trump family business entity owns 60% of WLFI and it "[is entitled to 75% of certain revenue from coin sales.](#)"

A former Federal Election Commission (FEC) general counsel [warned](#) that Trump and WLFI co-founder Steve Witkoff—who now serves as a federal official as Trump's Special Envoy to the Middle East—could both be in violation of the Emoluments Clause if foreign governments or their officials invest in WLFI. Upon becoming Special Envoy, Steve Witkoff reportedly [retained](#) his assets, which includes a company entitled to WLFI revenue, putting them in a blind trust controlled by his [sons](#), who are also WLFI [co-founders](#).

By May 2025, WLFI already had business ties to a foreign government. Steve Witkoff's son and fellow WLFI Co-Founder Zach Witkoff [announced](#) that United Arab Emirates-backed investment fund MGX would use WLFI's forthcoming stablecoin for a \$2 billion deal with Binance, the world's largest crypto exchange. The MGX-Binance deal, which represented "[a major contribution by a foreign government to President Trump's private venture,](#)" could potentially net WLFI insiders like the Trumps and Witkoffs tens of millions of dollars a year.

Now, an Accountable.US analysis reveals that President Trump and Steve Witkoff could potentially be in violation of the Emoluments Clause through the \$75 million in tokens WLFI has sold to Chinese crypto billionaire Justin Sun. Sun currently serves as Prime Minister of a micronation that is campaigning for official recognition and he has openly touted the influence his \$WLFI investments have had over the Trump administration and its diplomatic relations with the nation:

- **October 2024:** Justin Sun—a [Chinese billionaire](#) who is now an "[official advisor](#)" to WLFI and has become its "[biggest known investor](#)"—was [elected](#) as [Prime Minister](#) of Liberland, a [libertarian micronation](#) working to have its statehood recognized. Sun was expected to be "[front and center of the campaign to make Liberland a reality.](#)" Liberland's official website states, "[the Prime Minister is the most important figure in the congress and, theoretically, the entire country.](#)"
- **January 2025:** Ahead of Trump's inauguration, Sun, in his official capacity as Liberland's head of state, [touted his initial \\$30 million \\$WLFI investment](#) as he discussed how to influence the "[extremely important](#)" Trump administration, calling it "[a very precious opportunity for Liberland in 2025.](#)" Sun specifically noted meeting with WLFI co-founder and Special Envoy to the Middle East Steve Witkoff, expecting to meet him again at Trump's inauguration, while Sun anticipated a "[big breakthrough](#)" in Liberland's diplomatic relations with the U.S.

In An Interview Hosted By Liberland's Official YouTube Channel, Sun [Told](#) Liberland's President Vít Jedlička:

- [1.](#) *"I personally invest, you know, \$30 million into the Trump crypto project World Liberty Financials and I think in this new administration we have lots of allies."*
- [2.](#) *"So I think if we have a very good stand on U.S. policies we will have a big breakthrough in the diplomatic relationship. And also the same time last month I traveled to Dubai and Abu Dhabi also met with President [unclear, appears to be Vit Jedlička] together. I met Eric Trump, Steven Witkoff, which I think is very important. I will meet them again in January 20th, in the inauguration."*
- [3.](#) *"Start from, you know, the new Envoy to the Middle East [Steve Witkoff] in the Trump Administration and also of course the new minister of commerce and the other minister I think in the office. So I think this is a very precious opportunity for Liberland in 2025, you know, to have a good relationship uh with the current U.S. government because I think Trump, President Trump is a bold man. He also loves to do unprecedented, you know, move, so which I think is also very important for Liberland."*
- **January 2025:** Liberland's president Vít Jedlička and a delegation were [scheduled](#) to attend Trump's 2025 inauguration and the government offered a "[Special VIP Package](#)," which it said was "[organized in conjunction](#)" with the Trump inaugural committee. The package included attendance at exclusive inauguration events like the Trump cabinet reception and the presidential Starlight Ball, which Trump [attended](#). Liberland's Vice President Bogie Wozniak was [pictured](#) at a formal inaugural event alongside Argentina's Vice President Javier Milei and Liberland's Minister of Finance Navid Saberín also appeared to be in [attendance](#).
- **February 2025:** The Trump Securities and Exchange Commission (SEC) raised ethics alarms when it [paused](#) a federal fraud case against Sun after he bought a total of \$75 million in \$WLFI.
- **May 2025:** Sun [confirmed](#) that he was the [top holder](#) of the \$TRUMP meme coin, which is separate from \$WLFI, with over [\\$23 million](#) in \$TRUMP as of May 22, the day the President would appear at an "[ultra-exclusive private VIP reception](#)" for top coin holders. On the day of the \$TRUMP gala—which was called an "[ethics nightmare](#)"—Liberland President Vít Jedlička shared a video of #1 \$TRUMP holder Justin Sun entering the White House complex, writing, "[Prime Minister of @Liberland in White House today!](#)"
- **May 2025:** WLFI [announced](#) its new stablecoin, USD1, would be integrated into the Tron blockchain, which was [founded](#) by Justin Sun. Sun had high ambitions for the deal, saying, "[I'm really honored, we can collaborate with USD1 on launching this stablecoin to further make this available to 7 billion people on Earth.](#)"

Justin Sun could have financial interests in the Liberland cause. Liberland "[survives on the support of rich patrons](#)" and its President Vít Jedlička has [vocally touted](#) Justin Sun's wealth while defending Liberland's annual budget from dissenters. President Jedlička was also recorded while presenting Sun a \$30 million development project for the nation, telling Sun "[we just need to keep pushing and show a little bit of the financial power that Liberland holds at this stage.](#)"

Additionally, the Liberland Aid Foundation, a U.S.-based 501(c)(3) nonprofit organization, is located in the [same office](#) as [ATOLLeTC LLC](#), a lobbying firm that has [lobbied Congress](#) on Liberland's recognition as recently as Q1 2025. The firm is run by two [Liberland ambassadors](#) and its [Vice President](#), who [don't](#) appear to be registered as foreign lobbyists.

Previously, during Trump's first term, Liberland hosted an "[exclusive reception](#)" at Trump's Washington D.C. Hotel in September 2018, with its President and Vice President in attendance. Notably, Trump's D.C. hotel took at least [\\$750,000](#) from foreign officials and was the subject of Emoluments Clause scrutiny.

The Emoluments Clause—which is actually three provisions barring improper foreign and domestic influence on federal officers—covers “[private, arm’s-length market transactions](#),” according to federal district courts who have weighed the issue. The Clause was not seriously litigated until [three major lawsuits](#) alleged that Trump’s properties took improper payments from foreign governments during his first term. Two of these cases were dismissed as moot following Trump’s 2020 election loss and the third was denied review by the U.S. Supreme Court.

Ethics Experts Have Warned That The Trump Family’s World Liberty Financial Inc. (WLFI) Could Be In Violation Of The Constitution’s Emoluments Clause Barring Federal Officials From Accepting Gifts Or Favors From Foreign Governments.

Ethics Experts Have Warned That Trump Family Cryptocurrency Venture World Liberty Financial Inc. (WLFI) Could Be In Violation Of The U.S. Constitution’s Emoluments Clause, Which Bars Federal Officials From Accepting Gifts Or Advantages From Foreign Governments.

According To Ethics Experts, The Trump Family’s Cryptocurrency Venture World Liberty Financial Inc. (WLFI) Could Be In A Position To Violate The U.S. Constitution’s Emoluments Clause, Which Prohibits Federal Officials From Accepting Gifts Or Other Advantages From Foreign Governments Without Congressional Approval. “A crypto venture recently unveiled by U.S. President-elect Donald Trump and his new Middle East envoy, billionaire Steve Witkoff, has partnered with a crypto platform that authorities and financial experts say has been used by criminals and Iran-backed militant groups Hamas and Hezbollah. World Liberty Financial Inc , founded by the Witkoff family two months before November’s U.S. election with Trump as a financial beneficiary , presents concerns over ethics and conflicts of interest, say six specialists in U.S. government ethics. If foreign governments or sovereign wealth funds were to invest in World Liberty, that could place Witkoff and Trump in violation of the U.S. Constitution’s ‘emoluments’ clause, designed to thwart corruption and improper influence on government, said Larry Noble, a professor at American University and former general counsel of the Federal Election Commission . The clause bars federal officials from accepting gifts or other advantages from foreign governments without congressional approval.” [Reuters, [12/12/24](#)]

- **The U.S. Constitution Mentions Emoluments In Three Provisions, Including The Foreign Emoluments Clause, The Domestic Emoluments Clause, And The Ineligibility Clause.** “The Constitution mentions emoluments in three provisions, each sometimes referred to as the ‘Emoluments Clause’.” [Congressional Research Service, [01/27/21](#)]

Donald Trump Was “Financial Beneficiary” Of World Liberty Financial When It Was Founded Two Months Before His Re-Election In November 2024. “World Liberty Financial Inc , founded by the Witkoff family two months before November’s U.S. election with Trump as a financial beneficiary , presents concerns over ethics and conflicts of interest, say six specialists in U.S. government ethics.” [Reuters, [12/12/24](#)]

Trump, Who Is WLFI’s “Chief Crypto Advocate,” Is “Entitled To A Cut Of Its Revenues,” With He And Other WLFI Affiliates Entitled To 75% Of Some WLFI Revenues. “Trump is listed as ‘chief crypto advocate’ on World Liberty’s website and is entitled to a cut of its revenues, according to the company’s terms and conditions. World Liberty sells a proprietary token that cannot be traded, those terms and conditions say, unlike Bitcoin and other crypto tokens. Trump and other unnamed ‘affiliates’ are entitled to 75% of some World Liberty revenues, according to the terms, raising the possibility of people buying World Liberty coins to try to gain favor with him.” [Reuters, [12/12/24](#)]

- Trump Was Still Listed As WLFI’s “Chief Crypto Advocate” As Of April 30, 2025:



[World Liberty Financial Inc., accessed [04/30/25](#)]

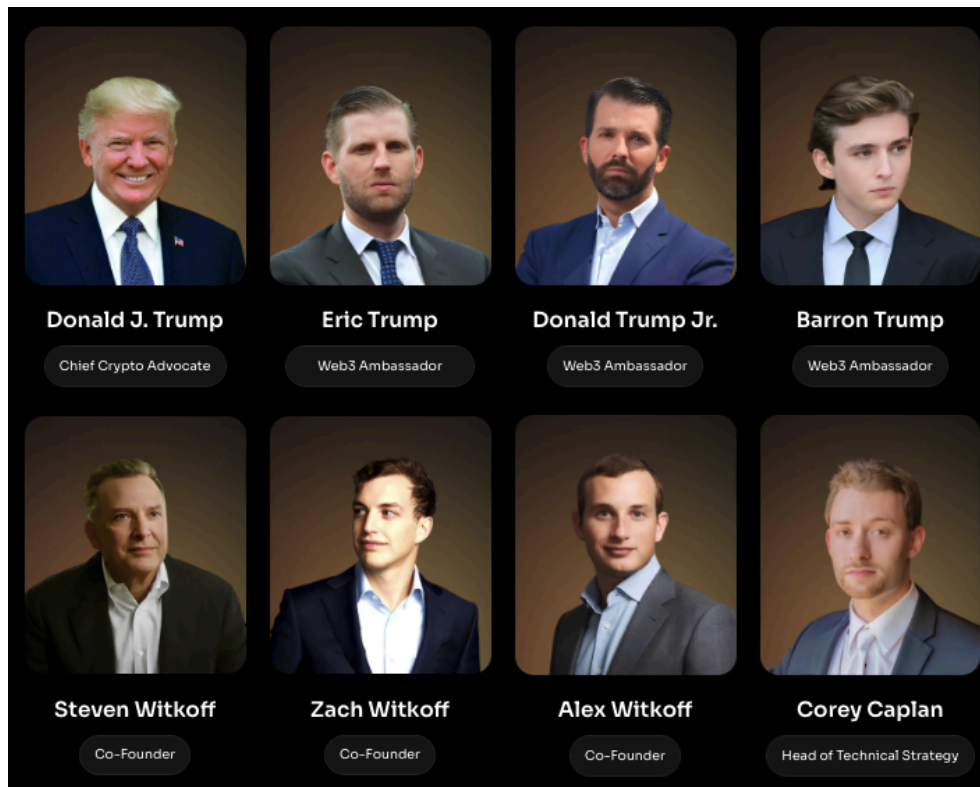
WLFI’s “Connection With Trump Features Heavily On The Company’s Website,” And Trump Himself Unveiled The Business In September 2024. “World Liberty’s connection with Trump features heavily on the company’s website. A picture of Trump, ear bandaged after the July assassination attempt on him, greets visitors on the home page. The first people listed as members of the World Liberty team are Trump and his three sons, Don Jr., Eric and Barron, who are described as ‘Web3 ambassadors.’ Trump himself, along with relatives and associates, unveiled the business during a live event on X in September. Don Jr. and Barron did not respond to requests for comment.” [Reuters, [12/12/24](#)]

A Former Federal Election Commission (FEC) General Counsel Argued That Trump And WLFI Co-Founder Witkoff, Who Now Serves As Trump’s Special Envoy To The Middle East, Could Be In Violation Of The Emoluments Clause If Foreign Governments Invest In WLFI.

WLFI, Controlled By Trump’s Family, Was Co-Founded By Trump’s Close Friend Billionaire Steve Witkoff And His Two Sons—Witkoff, Who Now Serves As Trump’s Special Envoy To The Middle East, Reportedly Transferred His Assets To His Sons Upon Entering The Trump Administration.

WLFI Is Controlled By President Trump’s Family And Was Co-Founded By Billionaire Steve Witkoff And His Two Sons, Zach And Alex. “As World Liberty Financial raised more than half a billion dollars, President Donald Trump’s family took control of the crypto venture and grabbed the lion’s share of those funds, aided by governance terms that industry experts say favor insiders.” [Reuters, [03/31/25](#)]

- WLFI Was Co-Founded By Steve Witkoff And His Sons, Zach And Alex:



[World Liberty Financial Inc., accessed [04/30/25](#)]

- **Steve Witkoff Was Entitled To Some Of World Liberty's Revenues As Of December 2024.** "Witkoff co-founded World Liberty and has a stake in a company -- WC Digital Fi, LLC -- that is entitled to some of World Liberty's revenues, according to the company's terms. [...] Witkoff's sons, Alex and Zach, are also listed as co-founders of World Liberty. They did not respond to requests for comment. Eric Trump told Reuters he is 'very involved' in World Liberty." [Reuters, [12/12/24](#)]

November 2024: Then-President Elect Trump Named WLFi Co-Founder Steve Witkoff, Longtime Chairman And CEO Of Real Estate Company Witkoff, As Special Envoy To The Middle East. "November 12, 2024 [...] I am pleased to announce that I have appointed Steven C. Witkoff to be Special Envoy to the Middle East. Steve is a Highly Respected Leader in Business and Philanthropy, who has made every project and community he has been involved with stronger and more prosperous. [...] Steven Witkoff is Chairman & Chief Executive Officer of Witkoff, which he founded in 1997. Since founding the firm, Mr. Witkoff has leveraged his extensive real estate expertise to successfully lead the financing, repositioning, and construction of over 70 properties in major business districts in the U.S. as well as abroad and with offices in New York, Los Angeles, and Miami." [The American Presidency Project, [11/12/24](#)]

Upon Joining The Trump Administration, Witkoff Claimed He Was Divesting "From His Crypto Assets As Well As His Holdings In Real Estate, Transferring Holdings To His Sons." "Witkoff has said he's in the process of divesting from his crypto assets as well as his holdings in real estate, transferring holdings to his sons to manage potential conflicts of interest." [Bloomberg, [03/13/25](#)]

Steve Witkoff Is A Wealthy New York City Real Estate Businessman Who Is Close Personal Friends With President Donald Trump. "But that Palm Beach party, in April 2022, was also something else: an extravagant reminder of the distance that the groom's father, Steven Witkoff, had traveled over his nearly seven decades. From his boyhood in the Bronx, Witkoff ascended to the peak of the real-estate business in New York and Florida, and along the way secured a privileged place in Donald Trump's court." [The Wall Street Journal, [11/17/24](#)]

- **Witkoff “Has Been One Of Trump’s Closest And Most Constant Friends” And Reportedly Traveled With Trump Throughout His 2024 Re-Election Campaign.** “Elon Musk may be Trump’s most visible new ‘bestie’ since throwing his weight and money behind the president-elect’s campaign, but Witkoff has been one of Trump’s closest and most constant friends on his climb back to power. Witkoff traveled with Trump throughout his campaign and stayed with him at Mar-a-Lago in the week leading up to election day. Witkoff was golfing with Trump on the day of an attempted assassination in September.” [The Wall Street Journal, [11/17/24](#)]

Steve Witkoff Testified On Behalf Of Trump In His New York City Fraud Case. “Nonetheless, Witkoff took the stand to testify in the New York attorney general’s \$250 million civil case against the Trump family and its namesake business. The New York City-based real estate executive with longtime ties to Trump and the Trump Organization was the first expert witness to be called by defense attorneys, who began presenting their case Monday.” [Courthouse News Service, [11/14/23](#)]

Larry Noble, A Former Federal Election Commission (FEC) General Counsel, Argued That Trump And WLFI Co-Founder Steve Witkoff Could Be In Violation Of The Emoluments Clause If Foreign Governments Or Sovereign Wealth Funds Invest In WLFI.

Larry Noble, A Former General Counsel For The Federal Election Commission (FEC) Who Currently Is A Professor At American University, Reportedly Said “If Foreign Governments Or Sovereign Wealth Funds Were To Invest In World Liberty, That Could Place Witkoff And Trump In Violation Of The U.S. Constitution’s ‘emoluments’ Clause, Designed To Thwart Corruption And Improper Influence On Government.” “If foreign governments or sovereign wealth funds were to invest in World Liberty, that could place Witkoff and Trump in violation of the U.S. Constitution’s ‘emoluments’ clause, designed to thwart corruption and improper influence on government, said Larry Noble, a professor at American University and former general counsel of the Federal Election Commission . The clause bars federal officials from accepting gifts or other advantages from foreign governments without congressional approval.” [Reuters, [12/12/24](#)]

WLFI Is Controlled By President Trump’s Family And Was Co-Founded By Billionaire Steve Witkoff And His Two Sons, Zach And Alex. “As World Liberty Financial raised more than half a billion dollars, President Donald Trump’s family took control of the crypto venture and grabbed the lion’s share of those funds, aided by governance terms that industry experts say favor insiders.” [Reuters, [03/31/25](#)]

Steve Witkoff Reportedly Planned To Retain Ownership Of His Assets, Which Include A Company Entitled To WLFI Revenue, And Put Them Into A Blind Trust Upon Becoming Special Envoy.

Witkoff Reportedly Planned To Put His Investments Into A Blind Trust But Planned To Retain Ownership Of His Assets, Including His Company WC Digital Fi LLC, Which Is Entitled To Some WLFI Revenue. “World Liberty co-founder Mr Witkoff is a close friend of Trump’s. He’s a donor to his Republican presidential campaign, was playing golf with the President-elect during his second apparent assassination attempt and testified as an expert witness during Trump’s civil fraud trial in New York. He also has a stake in a company — WC Digital Fi, LLC — that is entitled to some of World Liberty’s revenues, according to the company’s terms. He plans to put all his investments in a ‘blind trust,’ said a person familiar with Mr Witkoff’s plans to Reuters, who declined to be identified. The source, however, said Mr Witkoff would retain ownership of his assets.” [Australian Broadcasting Corporation, [12/12/25](#)]

Even With A Trust, Witkoff Could Face Conflicts Of Interest, With Former White House Ethics Counsel Richard Painter Saying, “Whether You’re Involved In The Management Of The Company Or Not, That’s Not Relevant At All. What’s Relevant Is If You Own A Financial Interest That Could Be Directly Impacted By Your Government Work.” “Even with a trust, World Liberty sets up potential conflicts of interest, the

ethics specialists told Reuters. Witkoff's Middle East policy recommendations could be affected by what he sees as best for World Liberty as opposed to the United States, they said. Even if Witkoff sets up a trust and isn't involved in World Liberty's day-to-day operations, potential conflicts exist so long as he maintains a financial stake in the company, said Richard Painter, ethics counsel to former president George W. Bush and a University of Minnesota professor. 'Whether you're involved in the management of the company or not, that's not relevant at all. What's relevant is if you own a financial interest that could be directly impacted by your government work,' said Painter." [Reuters, [12/12/24](#)]

The U.S. Office Of Government Ethics (OGE) Did Not List Any Ethics Documents For Witkoff As Of April 30, 2025:

Date Added	Title	Type	Name
Filter Date Added	Filter Title	Filter Type	witkoff
No matching records found			

[U.S. Office of Government Ethics, accessed [04/30/25](#)]

May 2025: Steve Witkoff's Son And WLFI Co-Founder Zach Witkoff Announced UAE-Backed Investment Fund MGX Would Use \$WLFI For A \$2 Billion Deal With Binance, Potentially Netting WLFI Insiders Tens Of Millions Of Dollars A Year—The Deal Represented “A Major Contribution By A Foreign Government To President Trump's Private Venture.”

May 2025: Zach Witkoff, Steve Witkoff's Son And A WLFI Co-Founder, Announced That Emirati State-Backed Investment Fund MGX Would Make A \$2 Billion Deal With Crypto Exchange Binance Using WLFI's Tokens, Potentially Generating Tens Of Millions Of Dollars A Year For The Trump Family.

May 1, 2025: Zach Witkoff, Steve Witkoff's Son And A WLFI Co-Founder, Announced That Emirati State-Backed Investment Fund MGX Would Make A \$2 Billion Business Deal With Binance Using WLFI's Cryptocurrency Coins. “Sitting in front of a packed auditorium in Dubai, a founder of the Trump family cryptocurrency business made a brief but monumental announcement on Thursday. A fund backed by Abu Dhabi, he said, would be making a \$2 billion business deal using the Trump firm's digital coins. [...] Zach Witkoff, a founder of the Trump family crypto firm, World Liberty Financial, revealed that a so-called stablecoin developed by the firm, would be used to complete the transaction between the state-backed Emirati investment firm MGX and Binance, the largest crypto exchange in the world.” [The New York Times, [05/01/25](#)]

- **Zach Witkoff Appeared Alongside Eric Trump At The United Arab Emirates Conference.** “Mr. Witkoff and Eric Trump were speaking on a panel at Token2049, a major crypto conference in the United Arab Emirates, where more than 10,000 digital currency enthusiasts have gathered for a week of networking.” [The New York Times, [05/01/25](#)]



[The New York Times, [05/01/25](#)]

The Details Of WLFI's Arrangement With MGX And Binance Were Not Clear, But It Appeared That WLFI Now Had \$2 Billion In Deposits To Invest, Potentially Generating "Tens Of Millions Of Dollars A Year In Revenue For The Trump Family" And Its WLFI Partners. "The precise details of World Liberty's arrangement with MGX and Binance are unclear. But it appears that, with one deal, World Liberty now has \$2 billion in deposits to invest. Those funds alone could generate tens of millions of dollars a year in revenue for the Trump family and its partners at World Liberty." [The New York Times, [05/01/25](#)]

Zach Witkoff Said, "We Thank MGX And Binance For Their Trust In Us," And "It's Only The Beginning." "We thank MGX and Binance for their trust in us," said Mr. Witkoff, who is the son of the White House envoy to the Middle East, Steve Witkoff. "It's only the beginning." [The New York Times, [05/01/25](#)]

The Heavily-Conflicted Deal Represented "A Major Contribution By A Foreign Government To President Trump's Private Venture," Officially Brought "A Trump Family Company Into Business With A Venture Firm Backed By A Foreign Government."

The Deal Represents "A Major Contribution By A Foreign Government To President Trump's Private Venture — One That Stands To Generate Hundreds Of Millions Of Dollars For The Trump Family." "That transaction would be a major contribution by a foreign government to President Trump's private venture — one that stands to generate hundreds of millions of dollars for the Trump family. And it is a public and vivid illustration of the ethical conflicts swirling around Mr. Trump's crypto firm, which has blurred the boundary between business and government." [The New York Times, [05/01/25](#)]

***The New York Times* Reported, "Virtually Every Detail Of Mr. Witkoff's Announcement, Made During A Conference Panel With Mr. Trump's Second-Eldest Son Contained A Conflict Of Interest."** "Virtually every detail of Mr. Witkoff's announcement, made during a conference panel with Mr. Trump's second-eldest son contained a conflict of interest." [The New York Times, [05/01/25](#)]

MGX's Use Of WLFI's USD1 Stablecoin Officially Brought "A Trump Family Company Into Business With A Venture Firm Backed By A Foreign Government." "MGX's use of the World Liberty stablecoin,

USD1, brings a Trump family company into business with a venture firm backed by a foreign government.” [The New York Times, [05/01/25](#)]

The Deal Created “A Formal Link” Between WLFI And Binance, Which “Has Been Under U.S. Government Oversight Since 2023, When It Admitted To Violating Federal Money-Laundering Laws.”

“The deal creates a formal link between World Liberty and Binance — a company that has been under U.S. government oversight since 2023, when it admitted to violating federal money-laundering laws.” [The New York Times, [05/01/25](#)]

Sitting Alongside Zach Witkoff And Eric Trump During The Announcement Was Chinese Crypto Billionaire Justin Sun, Who Bought \$75 Million In \$WLFI Coins Shortly Before The Trump

Administration Dropped A Fraud Case Against Him. “Sitting alongside Mr. Witkoff and Eric Trump was one of World Liberty’s top investors, Justin Sun, a Chinese-born billionaire who runs the crypto platform TRON. Mr. Sun bought \$75 million in \$WLFI coins after the election.” [The New York Times, [05/01/25](#)]

- **In January 2025, TRON Blockchain Founder And Chinese National Justin Sun Increased His WLFI Stake To \$75 Million, Shortly Before A Court Filing Showed That Sun And Trump’s Securities And Exchange Commission Were Exploring A Resolution To A Civil Fraud Case Against Sun.** “In January, Tron blockchain founder Justin Sun upped his stake in WLFI tokens to \$75 million. A court filing the following month showed that Sun and the SEC were exploring a resolution to the regulator’s civil fraud case against the crypto entrepreneur.” [CNBC, [03/17/25](#)]

President Trump Was Scheduled To Visit The U.A.E. Within Weeks Of The Announcement. “The president himself is set to travel to Saudi Arabia, Qatar and the U.A.E. on a state visit in two weeks.” [The New York Times, [05/01/25](#)]

May 2025: WLFI Announced Its New Stablecoin Would Be Integrated Into The Tron Blockchain, Which Was Founded By Chinese Billionaire Justin Sun, An “Official Advisor” To WLFI Whose Federal Fraud Case Was Paused By The Trump SEC After He Bought \$75 Million In \$WLFI And Who Appears To Be The Top Holder Of The \$Trump Meme Coin, With About \$17 Million.

May 2025: WLFI Co-Founder Zach Witkoff, Steve Witkoff’s Son, Announced That The Company’s Forthcoming Stablecoin Would Be Integrated Into Tron, The Blockchain Of Chinese Crypto Billionaire Justin Sun, Who Is An “Official Advisor” To WLFI.

May 2025: At The Same Event Where WLFI Co-Founder Zach Witkoff Announced That WLFI’s Forthcoming Stablecoin USD1 Would Be Used To Finance MGX-Binance Deal, Witkoff Also Announced That USD1 Would Be Integrated Into Tron, “The Blockchain Of Hong Kong-Based Crypto Entrepreneur Justin Sun.” “Separately, Zach Witkoff announced that USD1 would be integrated into Tron, the blockchain of Hong Kong-based crypto entrepreneur Justin Sun. Sun is the biggest known investor in World Liberty and an adviser to the venture, according to his social media posts, having poured at least \$75 million into the project.” [Reuters, [05/01/25](#)]

- **Justin Sun Founded Tron.** “In July 2017, he founded the blockchain company, Tron. [...] Tron is a blockchain company with its own cryptocurrency that is “dedicated to building the infrastructure for a truly decentralized Internet,” his LinkedIn page states.” [Business Insider, [03/23/23](#)]

- **Justin Sun Is “Not A US Citizen.”** “As part of the regulator’s approach to establish jurisdiction, the Commission added that Sun — who is not a US citizen — broadcasted a livestream from the San Francisco office which allegedly promoted the Tron ecosystem.” [Blockworks, [04/19/24](#)]
- **Justin Sun “Is Based In Switzerland And Is A Citizen Of Grenada.”** “She also highlighted an investigation of Tron founder Sun by the U.S. Securities and Exchange Commission. In 2023, the SEC charged Sun with fraud, accusing him of artificially inflating trading volume and concealing payment to celebrities to promote his companies. Sun, who is based in Switzerland and is a citizen of Grenada, said the SEC charges ‘lack merit.’ The case is ongoing.” [Reuters, [12/12/24](#)]
- **Justin Sun Has Citizenship In Malta And He Claims To Have Citizenship In The Caribbean Islands, Saint Kitts, And Nevis.** “In some ways, Sun’s Maltese citizenship isn’t exceptional because he has other destinations he could escape to. He claimed in a court declaration that he is also a citizen of the Caribbean islands, Saint Kitts and Nevis. Another former employee told me Sun bragged offhand about intending to buy a passport from the small West African nation of Guinea-Bissau.” [The Verge, [03/09/22](#)]
- **Justin Sun Is A Chinese National.** “Justin Sun, a Chinese national accused of fraud, sent Donald Trump \$18 million last week.” [The New Republic, [12/03/24](#)]

Justin Sun Is An “Official Advisor” To World Liberty Financial Inc. “Sun is also an official adviser to World Liberty, which lists President Donald Trump as its ‘chief crypto advocate’ and his son Barron as its ‘DeFi visionary.’” [CNN, [02/28/25](#)]

Justin Sun Is A Billionaire. “Justin Sun -- a cryptocurrency billionaire famous in part for his purchase of a \$6 million banana art piece last month -- announced his \$30 million investment in the Trump-backed World Liberty Financial last week, making him the company’s largest investor.” [ABC News, [12/06/24](#)]

In February 2025, Trump’s Securities And Exchange Commission (SEC) Paused Its Fraud Case Against Justin Sun After He Bought A Total Of \$75 Million In WLFI Tokens—And Sun Appeared To Be Among The Top Holders Of The \$TRUMP Meme Coin, Holding About \$17.8 Million As Of May 2025.

In January 2025, TRON Blockchain Founder And Chinese National Justin Sun Increased His WLFI Stake To \$75 Million, Shortly Before A Court Filing Showed That Sun And Trump’s Securities And Exchange Commission Were Exploring A Resolution To A Civil Fraud Case Against Sun. “In January, Tron blockchain founder Justin Sun upped his stake in WLFI tokens to \$75 million. A court filing the following month showed that Sun and the SEC were exploring a resolution to the regulator’s civil fraud case against the crypto entrepreneur.” [CNBC, [03/17/25](#)]

November 2024: Justin Sun And TRON Became WLFI’s “Largest Investor” Through Buying \$30 Million In WLFI Tokens—Until Sun’s purchase, WLFI “Appeared Headed For Failure.” “The newsletter Popular Information reports that Sun, most recently famous for spending \$6.2 million on a banana and then eating it, paid \$30 million for cryptocurrency tokens from World Liberty Financial, which is backed by Trump. In a pinned post on his X profile, Sun bragged about the purchase, saying his own blockchain start-up, TRON, was ‘committed to making America great again and leading innovation.’ Until Sun’s purchase, Trump’s crypto start-up appeared headed for failure with only \$22 million in tokens sold, far short of its goal of \$300 million in sales. The purchase not only keeps the WLF going, but also guarantees a windfall for Trump.” [The New Republic, [12/03/24](#)]

- **November 2024: Sun Announced His \$30 Million WLFI Investment, Claiming It Made TRON WLFI’s “Largest Investor”:**



H.E. Justin Sun 🐦🔵🇺🇸
@justinsuntron

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We are thrilled to invest \$30 million in World Liberty Financial @worldlibertyfi as its largest investor. The U.S. is becoming the blockchain hub, and Bitcoin owes it to @realDonaldTrump! TRON is committed to making America great again and leading innovation. Let's go!

[X Post by @justinsuntron, 11/25/24, accessed [03/21/25](#)]

February 2025: The SEC, Which Had Charged Sun And His Companies For “Selling Unregistered Securities And Fraudulently Manipulating The Price Of Digital Token Tronix,” Asked A Federal Judge To Put Justin Sun’s Case “On Hold.” “A businessman who pumped \$75 million into the Trump family-backed crypto token finds himself in a fortunate position this week as federal securities regulators are hitting pause on their civil fraud case against him. On Wednesday, lawyers for the Securities and Exchange Commission and Justin Sun, a 34-year-old Chinese crypto entrepreneur, asked a federal judge to put the agency’s case on hold, citing the interests of both sides and ‘the public’s interest.’ The pause is a 180 for the SEC, America’s top financial regulator, which two years ago charged Sun and his companies — Tron, BitTorrent and Rainberry — with selling unregistered securities and fraudulently manipulating the price of digital token Tronix. Sun and his companies sought to have the case dismissed.” [CNN, [02/28/25](#)]

April 23, 2025: President Trump’s Meme Coin \$TRUMP Surged After Announcing An “Exclusive Invitation” Promising The Top 220 \$TRUMP Holders A “Private Gala Dinner With The President,” With The Top 25 Holders Getting An “Ultra-Exclusive Private VIP Reception With The President.” “President Donald Trump’s meme coin surged more than 60% on Wednesday after a post announcing ‘the most EXCLUSIVE INVITATION in the world’ promised the top 220 buyers of \$TRUMP a private gala dinner with the president on May 22. In addition to the dinner at Trump National Golf Club in Washington, D.C., the top 25 holders would get ‘an ultra-exclusive private VIP reception with the President’ as well as a ‘Special Tour,’ according to the announcement.” [Reuters, [04/23/25](#)]

The “Sun” Account Registered For The Trump Gala Contest Was Suspected Of Being Connected To Justin Sun, “A Notable Supporter” Of Trump’s. “Someone with the username ‘Sun’ appears to have registered for President Donald Trump’s upcoming gala to be hosted for his official memecoin holders, according to Arkham Intelligence. The move has raised suspicions that the address may be connected to Tron founder Justin Sun, a notable supporter of the sitting president.” [The Block, [04/24/25](#)]




The “Sun” Account Was “Registered To An HTX Cold Wallet Previously Labeled By The Blockchain Analysis Firm” Arkham Intelligence—Justin Sun Is “An Advisor To The HTX Crypto Exchange.” “The Sun username is registered to an HTX cold wallet previously labeled by the blockchain analysis firm. Sun is an advisor to the HTX crypto exchange as well as an investor in the Trump-backed DeFi project World Liberty Financial.” [The Block, [04/24/25](#)]

As Of May 1, 2025, A User Called “Sun” With Crypto Wallet Address “8NBEBxLknGv5aRYefFrW2qFXoDZyi9fSHJNiJRvEcMBE” (8NBEB) Was Ranked First On The \$TRUMP Leaderboard, With 1,373,103.002 In \$TRUMP Coin, With A Time-Weighted Value Of 1,136,006.126:







\$TRUMP LEADERBOARD					
Rank	Username	Wallet Address	Current \$TRUMP Holdings	Time Weighted \$TRUMP Holdings ⓘ	
1	Sun VIP	8NBE...cMBE	1,373,103.002	1,136,006.126	

[GetTrumpMemes.com, accessed [05/01/25](#)]

Wallet 8NBEb's \$TRUMP Coins Were Valued At Over \$17.8 Million As Of May 1, 2025, Representing The Wallet's Second-Biggest Holding:

8NBEbxLknGv5aRYefFrW2qFXoDZyi9fSHJNiJRvEcMBE   

[...]

Token Account	Token Name	Symbol	Token Balance	Price	Value	Percentage
Cd3HX8...R9s8QA 	OFFICIAL TRUMP	 TRUMP 	1,373,103	\$13.03	\$17,895,394.67	32.21%
6JVD5m...AG8XWV 	Comedian	 Ban 	295,861,763.3	\$0.04921	\$14,559,413.32	26.2%

[Solscan, accessed [04/24/25](#)]

October 2024: Justin Sun Was Elected As Prime Minister Of Liberland, A Micronation Campaigning For Recognition—Sun, In His Capacity As Liberland's Head Of State, Cited His \$30 Million WLF1 Investment As He Discussed How To Influence The Trump Administration, Calling It “A Very Precious Opportunity For Liberland In 2025.”

October 2024: Justin Sun Was Elected As Prime Minister Of Liberland, A Micronation On Territory Disputed By Serbia And Croatia Not Currently Recognized By Any Other Nation—As Leader Of Liberland's Government, Sun Is Expected To Be “Front And Center Of The Campaign To Make Liberland A Reality.”

October 2024: Justin Sun Was Elected As Prime Minister Of Liberland, A Micronation And “Largely Theoretical European State Cooked Up By Right-Wing Libertarians In 2015” Which Was Not Recognized By Any Other Nation As Of October 2024. “Tron founder Justin Sun is many things. You can now count prime minister among them. This week, the micronation of Liberland—a largely theoretical European state cooked up by right-wing libertarians in 2015—announced that it elected Sun to serve as its head of state.” [Decrypt, [10/10/24](#)]

- Liberland Has “Attempted To Market Itself As A Crypto Haven That Would Run Government Operations On Its Own Blockchain Network, Pass Crypto-Friendly Legislation, And Establish ‘Decentralized Hyperdemocracy’ For Citizens Via On-Chain Voting Mechanisms.” “What would

the Liberland dream look like, if ever realized on the banks of the Danube? While the 'Laws' section of the micronation's website is currently empty, according to a Reddit post it previously featured highlights including zero restrictions on drugs and firearms, and an age of consent of 13. Liberland has also attempted to market itself as a crypto haven that would run government operations on its own blockchain network, pass crypto-friendly legislation, and establish 'decentralized hyperdemocracy' for citizens via on-chain voting mechanisms. According to a Reuters report last year, Liberland holds 99% of its currency reserves in Bitcoin." [Decrypt, [10/10/24](#)]

- **The Free Republic Of Liberland, A "Three-Square-Mile Tract Of Land Between Croatia And Serbia," Was Founded In 2015 By Czech Politician Vít Jedlička.** "Liberland, officially known as the Free Republic of Liberland, is a self-proclaimed microstate founded in 2015 by Czech politician Vit Jedlicka. It is situated on a three-square-mile tract of land between Croatia and Serbia, an area that has historically been disputed by the two nations. Founded with the aim of promoting libertarian ideals, Liberland advocates for minimal government intervention, limited taxation, and extensive individual freedoms. Despite its declaration of sovereignty and the establishment of a constitutional republic, Liberland has not been recognized as an independent country by any other nation." [EBSCO, accessed [05/01/25](#)]
- **"No nation on earth currently recognizes Liberland," Which Lays Claim To A Small Patch Of Territory Disputed By Serbia And Croatia.** "The average person might say 'nothing at all,' given the fact that Liberland lays claim to 2.7 miles of disputed, uninhabited floodplain currently being fought over by Croatia and Serbia. No nation on earth currently recognizes Liberland, and several self-proclaimed citizens of the mini-country have been arrested by Croatian authorities for trespassing when they've tried to enter it." [Decrypt, [10/10/24](#)]

Liberland's Official Website States, "The Prime Minister Is The Most Important Figure In The Congress And, Theoretically, The Entire Country" With The Country's Draft Constitution Stating That "The Prime Minister Leads The Government." "The Prime Minister is the most important figure in the Congress and, theoretically, the entire country. According to Liberland's draft Constitution, the Prime Minister leads the government. Although the exact structure is still being developed, the Prime Minister's role in Congress is largely informal. They represent the Cabinet, propose legislation for Congress to review, and guide referendums." [Free Republic of Liberland, accessed [05/02/25](#)]

As Prime Minister, Justin Sun "Will Now Be Front And Center Of The Campaign To Make Liberland A Reality." "As prime minister, Justin Sun will now be front and center of the campaign to make Liberland a reality. The new title replaces one the crypto founder formerly held; last year, Sun lost his role as ambassador to the World Trade Organization (WTO) for the tiny Caribbean island nation of Grenada. The gig came with the title of "His Excellency," an honorific that Sun eagerly added to his social media accounts, and still keeps to this day." [Decrypt, [10/10/24](#)]

Liberland's Official Website States That Justin Sun Currently Held The "Vital" Position Of Prime Minister, As Of May 2025. "Currently, this vital position is held by Justin Sun." [Free Republic of Liberland, accessed [05/02/25](#)]

Liberland's Official Website Also States That Justin Sun Is Currently A Member Of The Country's Congress:


Congress MEMBERS



Yuchen Sun

[Free Republic of Liberland, [10/08/24](#)]

April 2025: Liberland's Official Facebook Profile Stated That Justin Sun Was The "Recently Elected Prime Minister Of Liberland":

 **Liberland**
April 29 at 1:00 PM · 🌐

Liberland is home to some iconic figures advancing liberty worldwide:

- **Javier Milei** : Self-proclaimed "General AnCap of Liberland," known globally for his libertarian vision, and currently President of Argentina.
- **Ron Paul** : Legendary libertarian figure now making headlines in conversations with Trump and Musk about auditing the Federal Reserve—possibly via DOGE!
- **H.E. Justin Sun** : Founder of TRON blockchain and recently elected Prime Minister of Liberland, leading the nation into a blockchain-driven future.

They've joined the Liberland revolution—will you?
Discover more at <https://liberland.org/>

[Facebook Post by Liberland, 04/29/25, accessed [05/02/25](#)]

Justin Sun's Biography Listed By The Free Republic Of Liberland Also States That He Is The Ambassador And Former Permanent Representative Of Grenada To The World Trade Organization (WTO), Although Sun's Terms In These Roles Ended In March 2023:

H.E. Justin Sun Bio:

H.E. Justin Sun is the Ambassador and former Permanent Representative of Grenada to the WTO, Prime Minister of Liberland, Founder of TRON, a world-leading blockchain and DAO, and Advisor to HTX, one of the world's largest crypto exchanges. A protege of Alibaba's Jack Ma, Sun has been named Forbes' 30 under 30 in the Consumer Technology category several times, among other global recognitions. Sun is an avid art collector, gamer, investor, philanthropist, and space enthusiast.

[Free Republic of Liberland, accessed [05/01/25](#)]

- **Justin Sun's Personal Website Also States That He Is "Ambassador And Former Permanent Representative Of Grenada To The WTO."** "H.E. Justin Sun is the Ambassador and former

Permanent Representative of Grenada to the WTO, Founder of TRON, one of the world's largest blockchain DAO ecosystems, and Advisor to HTX, one of the world's largest crypto exchanges.” [HEJustinSun.com, accessed [05/01/25](#)]

- **March 2023: The Grenada Broadcasting Network Reported That Sun’s Term As Ambassador Had Ended And Sun Announced That His Term As Grenada’s Representative To The WTO Had Ended.** “In less than two weeks, Justin Sun, the 32-year-old crypto celebrity and founder of the Tron blockchain, has experienced multiple blows: a lawsuit from the Securities and Exchange Commission and now the end of his stint as Grenada’s representative to the World Trade Organization. The Grenada Broadcasting Network recently reported that his term as ambassador ended after the Caribbean island nation saw the current ruling party lose the general election last June. Early Friday morning, Sun told Fortune over Telegram that he was still serving as the ambassador and ‘any reports stating otherwise are inaccurate.’ But later on Friday, he partially corroborated the report on Twitter, announcing that his term as representative to the WTO ended effective that day.” [Fortune, [03/31/23](#)]

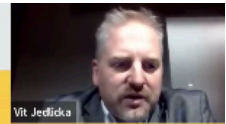


[X Post by @justinsuntron, 03/31/23, accessed [05/01/25](#)]

January 2025: In An Official Liberland Video, Then-Prime Minister Justin Sun Cited The \$30 Million He Invested Into WLFI As He Discussed How To Influence The Trump Administration, Specifically Citing WLFI’s Steve Witkoff—Sun Called It “A Very Precious Opportunity For Liberland In 2025” And Expected “A Big Breakthrough” In Liberland’s Diplomatic Relationship With The U.S.

January 5, 2025: Liberland’s Official YouTube Channel Posted An Interview Between Justin Sun And Liberland President Vít Jedlička Titled, “Justin Sun Presents His Plans For His Second Term In Liberland Congress”:

Join us in building
the freest nation
in the world



[...]

Justin Sun presents his plans for his second term in Liberland Congress



Liberland - Official
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31



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["Liberland - Official" via YouTube, 01/05/25, accessed [05/02/25](#)]



["Liberland - Official" via YouTube, 01/05/25, accessed [05/02/25](#)]

Liberland President Vít Jedlička Introduced Justin Sun As The Country's Prime Minister. "And that's where I would like to give the floor to Justin Sun, who has joined us from Hong Kong. I'm excited that he has taken the role of Prime Minister for the last three months." ["Liberland - Official" via YouTube, 01/05/25, accessed [05/02/25 \(00:51\)](#)]

In The Interview, Justin Sun Said, "The Most Important Relations For Us" Was With The United States And Called The Incoming Trump Administration "Extremely Important" For Liberland. "Yes, thank you Vit. So for me, I think—yeah, please—so I think for the 2025, the most important relations for us, of course, I think is with United States. Since in January 20th it's Trump's inauguration, we will have a new U.S. administration taking the role, which I think is extremely important." ["Liberland - Official" via YouTube, 01/05/25, accessed [05/02/25 \(01:13\)](#)]

Citing The "Numerous" Types Of Work Liberland Was Doing Before The Election, Sun Said, "I Personally Invest, You Know, \$30 Million Into The Trump Crypto Project World Liberty Financials And I Think In This New Administration We Have Lots Of Allies." "So before I think the election, we have doing a numerous amount of the work, as you know. I personally invest, you know, \$30 million into the Trump crypto project World Liberty Financials and I think in this new administration we have lots of allies." ["Liberland - Official" via YouTube, 01/05/25, accessed [05/02/25 \(01:47\)](#)]

Discussing Trump Administration Allies, Sun Cited Special Envoy To The Middle East Steve Witkoff First, Calling It "A Very Precious Opportunity For Liberland In 2025, You Know, To Have A Good Relationship Uh With The Current U.S. Government." "Start from, you know, the new Envoy to the Middle East in the Trump Administration and also of course the new minister of commerce and the other minister I think in the office. So I think this is a very precious opportunity for Liberland in 2025, you know, to have a good relationship uh with the current U.S. government because I think Trump, President Trump is a bold man. He also loves to do unprecedented, you know, move so which I think is also very important for Liberland." ["Liberland - Official" via YouTube, 01/05/25, accessed [05/02/25 \(02:11\)](#)]

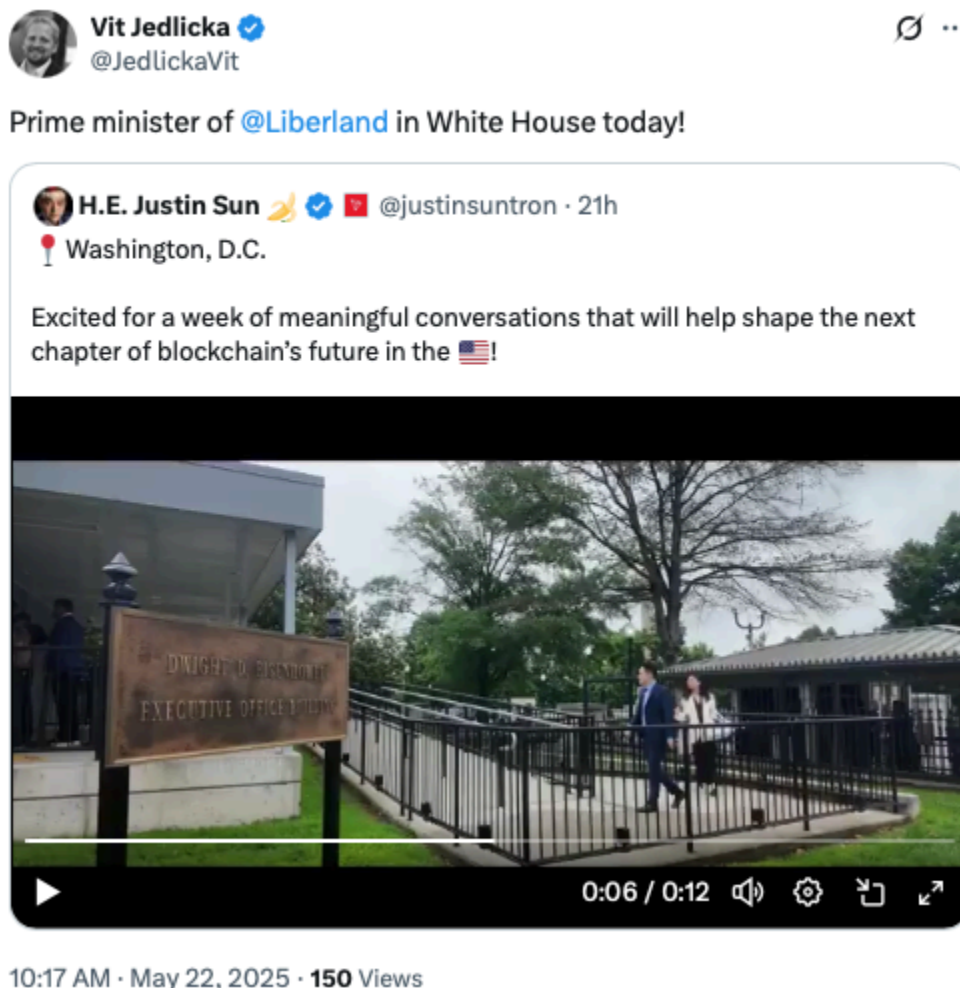
Sun Expected "A Big Breakthrough In The Diplomatic Relationship" With The U.S., Adding That He Met With Eric Trump And Steve Witkoff In The Middle East And Said "I Will Meet Them Again In January 20th, In The Inauguration." "So I think if we have a very good stand on U.S. policies we will have a big breakthrough in the diplomatic relationship. And also the same time last month I traveled to Dubai and Abu Dhabi also met with President [unclear] together. I met Eric Trump, Steven Witkoff, which I think is very important. I will meet them again in January 20th, in the inauguration." ["Liberland - Official" via YouTube, 01/05/25, accessed [05/02/25 \(03:09\)](#)]

Sun Said, "So I Think Will Be Extremely Important For Us To Continue To Build The U.S. Relationship, I Think Which Is Everything For Our Diplomatic Relationship." "So I think will be extremely important for us to continue to build the U.S. relationship, I think which is everything for our diplomatic relationship. And also besides the U.S. government relationship, I think our relationships with Croatia and Serbia are very important, but of course I think for this it's all decided by U.S. relationship actually." ["Liberland - Official" via YouTube, 01/05/25, accessed [05/02/25 \(03:46\)](#)]

Sun Said His Sponsorship Of The Bitcoin MENA Conference Was "A Good Example On How To Attract Allies In Our Space, Since Bitcoin MENA Is Also Supported By The Trump Family And His Administration." "And also, I think last month we sponsored Bitcoin MENA. Is also a good example on how to attract allies in our space, since Bitcoin MENA is also supported by the Trump family and his administration." ["Liberland - Official" via YouTube, 01/05/25, accessed [05/02/25 \(07:30\)](#)]

On The Day Of The \$TRUMP Memecoin Gala—Which Was Called An “Ethics Nightmare”—Liberland President Vít Jedlička Shared A Video Of #1 \$TRUMP Holder Justin Sun Entering The White House Complex, Writing, “Prime Minister Of @Liberland In White House Today!”

May 22, 2025: Liberland President Vít Jedlička Wrote “Prime Minister Of @Liberland In White House Today!” As He Reposted Justin Sun’s Video Of Himself Entering The Dwight D. Eisenhower Executive Office Building, Which Is Part Of The White House Complex:



[X Post by @JedlickaVit, 05/22/25, accessed [05/22/25](#)]

- **The Eisenhower Executive Office Building “Houses A Majority Of Offices For White House Staff.”** “The Eisenhower Executive Office Building (EEOB) is located next to the West Wing, and houses a majority of offices for White House staff.” [Obama White House Archive, accessed [05/22/25](#)]

April 23, 2025: President Trump’s Memecoin \$TRUMP Surged After Announcing An “Exclusive Invitation” Promising The Top 220 \$TRUMP Holders A “Private Gala Dinner With The President” On May 22, 2025, With The Top 25 Holders Getting An “Ultra-Exclusive Private VIP Reception With The President.” “President Donald Trump’s meme coin surged more than 60% on Wednesday after a post announcing ‘the most EXCLUSIVE INVITATION in the world’ promised the top 220 buyers of \$TRUMP a private gala dinner with the president on May 22. In addition to the dinner at Trump National Golf Club in

Washington, D.C., the top 25 holders would get ‘an ultra-exclusive private VIP reception with the President’ as well as a ‘Special Tour,’ according to the announcement.” [Reuters, [04/23/25](#)]




- **The May 22 Dinner Was Scheduled To Be Held At Trump’s Virginia Golf Club, With The Top 25 Winning An “Exclusive Reception” And A “VIP” Tour.** “Buyers of the Trump token, a cryptocurrency the president began marketing days before his inauguration, drove sales higher in the past two weeks after its issuers announced an unprecedented promotion: More than 200 of the memecoin’s largest holders would be invited to attend a May 22 dinner with Trump at his Virginia golf club, while the top 25 would qualify for an exclusive reception beforehand and what the memecoin’s website describes as a ‘VIP’ tour. Now, an analysis by Bloomberg News shows that all but six of the top 25 holders who have registered on the website’s leaderboard used foreign exchanges that say they exclude customers living in the US.” [Bloomberg, [05/07/25](#)]

Justin Sun Confirmed That The #1 Gala Contest Wallet Belonged To Him, Stating He Was “Honored To Support @POTUS And Grateful For The Invitation From @GetTrumpMemes To Attend President Trump’s Gala Dinner As His TOP fan!”:



[X Post by [@justinsuntron](#), 05/20/25, accessed [05/20/25](#)]

Sun’s Wallet Held About \$23.6 Million In \$TRUMP As Of May 22, 2025, The Day Of The Gala:

Token Account	Token Name	Symbol	Token Balance	Price	Value	Percentage
Cd3HX8...R9s8QA 	OFFICIAL TRUMP	 TRUMP 	1,508,003.3	\$15.7	\$23,686,604.19	32.23%

[Solscan, accessed [05/22/25](#)]

Ethics Watchdogs Warned That The \$TRUMP Gala Contest Could Violate Federal Rules Against Officials From Soliciting Gifts And The Constitution’s Prohibition Against Accepting Gifts From Foreign Governments. “Government-watchdog groups have condemned the dinner, saying it potentially violates federal rules that bar officials from soliciting gifts. If any attendees are linked to foreign states, the dinner could also violate the Constitution’s emoluments clause, which bars federal officials from accepting gifts from foreign governments, they say.” [The Wall Street Journal, [05/15/25](#)]

Former White House Special Counsel For Ethics Norm Eisen Called The \$TRUMP Dinner Contest An “Ethics Nightmare.” “‘It’s an ethics nightmare,’ said Norm Eisen, a former White House special counsel for ethics and government reform under the Obama administration.” [The Wall Street Journal, [05/15/25](#)]

Sen. Richard Blumenthal (D-CT) Said, “If [President Trump] Goes Ahead With It, It Will Be One Of The Most Outrageous Uses Of The Office For Self-Enrichment In American History.” “‘If he goes ahead with it, it will be one of the most outrageous uses of the office for self-enrichment in American history,’ Sen. Richard Blumenthal (D., Conn.) said of the memecoin dinner in an interview.” [The Wall Street Journal, [05/15/25](#)]

Liberland’s President And A Delegation Were Scheduled To Attend Trump’s 2025 Inauguration And The Government Offered A “Special VIP Package”—“Organized In Conjunction” With The Trump Inaugural Committee—To Attend Exclusive Inauguration Events Like The Cabinet Reception And The Presidential Starlight Ball.

January 2025: Liberland’s Official Site Offered A “Special VIP Package”—“Organized In Conjunction With The Trump Vance Inaugural Committee”—Offering Exclusive Inaugural Events Including The “Trump Cabinet Reception” And The “Starlight Ball” Alongside President Vít Jedlička And A Liberland Delegation.

January 2025: Liberland’s Official Site Posted, “Join Liberland In Washington, D.C. For The Presidential Inauguration!:

Join Liberland in Washington, D.C. for the Presidential Inauguration!

 Ministry of Foreign Affairs  13 Jan 2025

[Free Republic of Liberland, [01/13/25](#)]

Liberland’s Official Site Stated That It Was Hosting An Inauguration Reception Co-Sponsored By Justin Sun’s TRON Tech Ltd. “Liberland is coming to Washington, D.C. for the Presidential inauguration! We hope you’ll join our delegation to this historic event as well as our own reception on Tuesday, 21 January co-sponsored by TRON Tech Ltd. There are also some exciting crypto-related events you can also take part, as well as a special VIP package that includes much more.” [Free Republic of Liberland, [01/24/25](#)]

Liberland Offered A “Special VIP Package,” Which Was “Organized In Conjunction With The Trump Vance Inaugural Committee,” To Offer Guests Tickets To Exclusive Events Including The “Trump Cabinet Reception” And The “Starlight Ball”—One Of Three Inaugural Galas That Trump Attended:

Special VIP package: organized in conjunction with the Trump Vance Inaugural Committee (TVIC) includes access to exclusive inaugural events. You and your designees will receive the following allotment of tickets to these events:

TRUMP CABINET RECEPTION (2 TICKETS)
MAKE AMERICA GREAT AGAIN VICTORY RALLY (2 TICKETS)
SWEARING-IN CEREMONY (2 TICKETS)
PARADE (2 TICKETS)
STARLIGHT BALL (2 TICKETS)

[Free Republic of Liberland, [01/24/25](#)]

- **President Trump Attended The Starlight Ball—One Of Three Inaugural Presidential Balls—Which Was Attended By “Major Donors To The President’s Campaign.”** “President Trump and first lady Melania Trump attended three inaugural presidential balls to celebrate his 2025 inauguration Monday evening: the Commander-in-Chief Ball, the Liberty Ball and the Starlight Ball. [...]Country singer Gavin DeGraw was the star entertainer for the third inaugural ball, the Starlight Ball. Many of the guests invited to this event were major donors to the president's campaign.” [CBS News, [01/21/25](#)]



President Trump, first lady Melania Trump, and Vice President JD Vance and his wife Usha Vance on the dance floor at the Starlight Ball on Jan. 20, 2025 in Washington, D.C., following the inauguration.

GETTY IMAGES

[CBS News, [01/21/25](#)]

Liberland Stated That Its President Vít Jedlička And Other Members Of The Country’s Delegation Would Be Attending The VIP Events, Adding, The Cabinet Reception And Starlight Ball Would Be “A Prime Opportunity For Us To Make The Case For Liberland To The Incoming Administration.” “If you are interested in securing the VIP package and attending these events with President Vít Jedlička and other members of our delegation, please send an email to [info \(at\) liberland.org](mailto:info@liberland.org) for more details. These events, especially the Cabinet reception and Starlight Ball, will be a prime opportunity for us to make the case for

Liberland to the incoming administration and how we can partner with decision-makers in helping establish a new, free-market country in the Balkans.” [Free Republic of Liberland, [01/24/25](#)]

Liberland’s Vice President Bogie Wozniak Was Pictured At A Formal Event At Donald Trump’s 2025 Inauguration Alongside Argentina Vice President Javier Milei, Liberland’s Minister Of Finance Also Appeared To Attend The Event.

January 2025: Liberland’s Official Site Reported That Its Vice President Bogie Wozniak Was At Donald Trump’s Inauguration And Shared A Picture Of Him At A Formal Event With Argentina’s President Javier Milei. “At Donald Trump’s inauguration, a symbolic meeting took place that has the libertarian world buzzing. Liberland’s Vice President Bogie Wozniak - as well as Liberland Finance Minister Navid Saberini - crossed paths with Argentina’s reformist President Javier Milei, sparking speculation about the growing influence of libertarian ideals on the global stage.” [Free Republic of Liberland, [01/24/25](#)]



[Free Republic of Liberland, [01/24/25](#)]

Liberland’s Minister Of Finance Also Appeared To Attend The Same Event As Vice President Bogie Wozniak:



Navid Saberín
@NavSab



It was a pleasure meeting you last night, President @J Milei. Let's continue fostering the friendship between Argentina and Liberland. I am looking forward to seeing you in Liberland soon!



9:21 AM · Jan 21, 2025 · 4,815 Views

[X Post by @NavSab, 01/21/25, accessed [05/12/25](#)]

- **Navid Saberín Is Liberland's Minister Of Finance:**

Minister of Finance

Navid Saberín

Born and raised in Luxembourg, Navid Saberín is a multilingual expert with a degree in commerce, computer science, and sinology from the University of Toronto.

With a wealth of experience spanning banking, public relations, waste management, and real estate development across several continents, Saberín is a dedicated libertarian, aviation enthusiast, and passionate Bitcoin advocate.

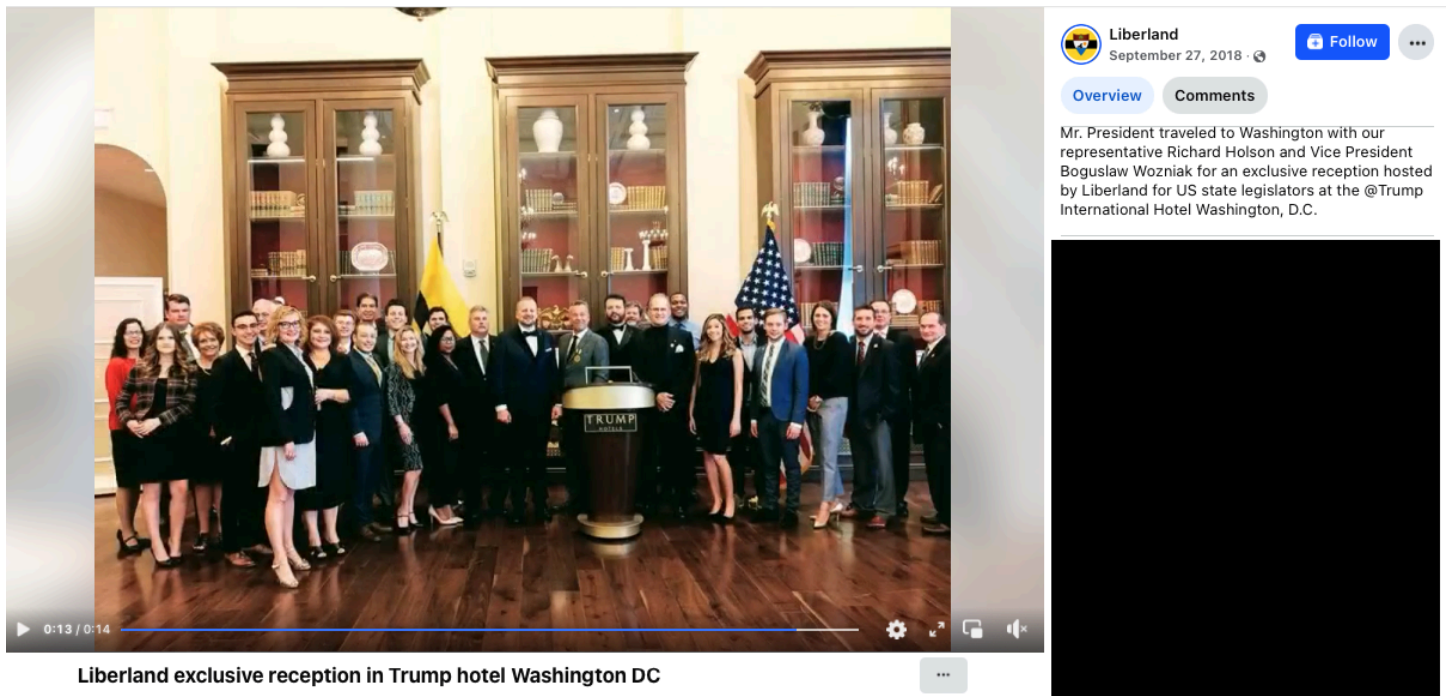


[Free Republic of Liberland, accessed [05/12/25](#)]

During Trump's First Term, Liberland Hosted An "Exclusive Reception" At Trump's Washington D.C. Hotel, Which Took At Least \$750,000 From Foreign Officials And Was The Subject Of Emoluments Clause Scrutiny.

September 2018: Liberland Hosted An “Exclusive Reception” For U.S. Legislators At Trump International Hotel In Washington D.C., With Its President And Vice President In Attendance—Trump’s D.C. Hotel Took At Least \$750,000 From Foreign Officials At “Sensitive Times” For Their Government’s Foreign Relations With The U.S.

September 2018: Liberland’s President Vít Jedlička, Its Representative Richard Holson, And Vice President Boguslaw Wozniak Attended “An Exclusive Reception Hosted By Liberland For Us State Legislators” At The Trump International Hotel Washington, D.C.” “Mr. President traveled to Washington with our representative Richard Holson and Vice President Boguslaw Wozniak for an exclusive reception hosted by Liberland for US state legislators at the @Trump International Hotel Washington, D.C.”:



[Facebook Post by Liberland, 09/27/18, accessed [05/02/25](#)]

November 2022: The House Oversight And Reform Committee Released Documents Showing “Extravagant Spending From Foreign Leaders At Former President Donald Trump’s Luxury Hotel In Washington, D.C.,” Suggesting Trump “Could Have Violated His Oath Of Office By Distorting U.S. Foreign Policy For Personal Financial Gain.” “Documents released by the House Oversight and Reform Committee show extravagant spending from foreign leaders at former President Donald Trump’s luxury hotel in Washington, D.C., which the committee says could have violated his oath of office by distorting U.S. foreign policy for personal financial gain.” [NPR, [11/15/22](#)]

The Committee Showed That Trump International Hotel In Washington, D.C. Took Over \$750,000 From Government Officials From China, Saudi Arabia, The United Arab Emirates, And Other Countries, At “At Sensitive Times For Those Countries’ Relations With The United States.” “Government officials from Malaysia, Saudi Arabia, Qatar, the United Arab Emirates, Turkey and the People’s Republic of China collectively spent over \$750,000 at the Trump International Hotel during his presidency, according to committee chairwoman Rep. Carolyn Maloney, D-N.Y., and, she said, did so ‘at sensitive times for those countries’ relations with the United States.” [NPR, [11/15/22](#)]

Then-House Oversight And Reform Committee Chairwoman Maloney Requested Documents Presidential Records To Determine If Trump Was In Violation Of The Emoluments Clause By Accepting Payments From Foreign Officials. “The documents — hotel ledgers from Trump's former accounting firm, Mazars USA LLP — were released in connection with a letter Maloney sent to the National Archives and Records Administration on Monday. That letter requested presidential records to determine whether Trump's business was a conflict of interest and in violation of the Constitution's Emoluments Clauses, designed to prevent corruption and foreign influence on federal officers.” [NPR, [11/15/22](#)]

Liberland “Survives On The Support Of Rich Patrons,” Its President Has Touted PM Justin Sun’s Wealth While Defending Liberland’s Budget, And Its President Was Recorded Telling Sun “We Just Need To Keep Pushing And Show A Little Bit Of The Financial Power That Liberland Holds At This Stage” While Presenting Sun A \$30 Million Development Project.

Liberland, Which Does Not Impose Taxes Due To Its Libertarian Ideology, Relies On Donations And “Survives On The Support Of Rich Patrons.”

Liberland, Which Does Not Charge Its Citizens Taxes, Relies On Donations And “Survives On The Support Of Rich Patrons.” “The micronation relies on donations, and makes small amounts selling passports and issuing stamps and coins. Most money it takes in is swiftly converted into Bitcoin. [...] Liberland survives on the support of rich patrons. But it could struggle if it plans to grow and accept more citizens.” [DL News, [10/10/23](#)]

- **Due To Liberland’s Libertarian Founding Ideology, It Does Not Charge Its Citizens Taxes.** “Liberland’s founding ideology is based on that of libertarian thinkers like Ayn Rand. It doesn’t charge citizens taxes, has minimal government, and wants to create a laissez-faire economy based on cryptocurrency.” [DL News, [10/10/23](#)]

Liberland President Vít Jedlička Has Touted Prime Minister Justin Sun’s Wealth When Rebutting People Complaining About Liberland’s Annual Budget, Saying, “Fun Fact Our Prime Minister Personal Income Just From Tron Fees Is 2 Million Usd Every 40 Minutes. Let That Sink In.”

April 2025: Liberland President Vít Jedlička Touted Justin Sun’s Wealth, Writing: “I Heard Some People Complaining That Current 2 Million USD Yearly Budget Of Liberland Is Too Much. Fun Fact Our Prime Minister Personal Income Just From Tron Fees Is 2 Million Usd Every 40 Minutes. Let That Sink In.”



[Instagram Post by @vjedlicka, [04/29/25](#)]

In An Official Liberia Video, President Vít Jedlička Is Shown Presenting The Nation's "Bold €30 Million Investment Plan" To Justin Sun, With Jedlička Saying, "We Just Need To Keep Pushing And Show A Little Bit Of The Financial Power That Liberia Holds At This Stage"—Liberia Has Stated The Project Is "Backed By International Investors."

At A Party For Crypto Company HTX, Vít Jedlička Showed Justin Sun Liberia's "Bold €30 Million Investment Plan Focused On The Development Of Infrastructure In The Liberia Region." "In a landmark encounter during the vibrant HTX Party, President Vít Jedlička of Liberia met with Prime Minister Justin Sun, marking a key moment in the micronation's diplomatic and economic journey. [...] Amidst the festivities, President Jedlička proudly handed over the first printed edition of the Liberia Newspaper to Prime Minister Sun. The publication outlines a bold €30 million investment plan focused on the development of infrastructure in the Liberia region—set to be rolled out over the next two years." [PublishOx, [05/07/25](#)]

- **Justin Sun Is A Member Of HTX's Global Advisory Board:**



Member of the Global Advisory Board

HTX · Part-time

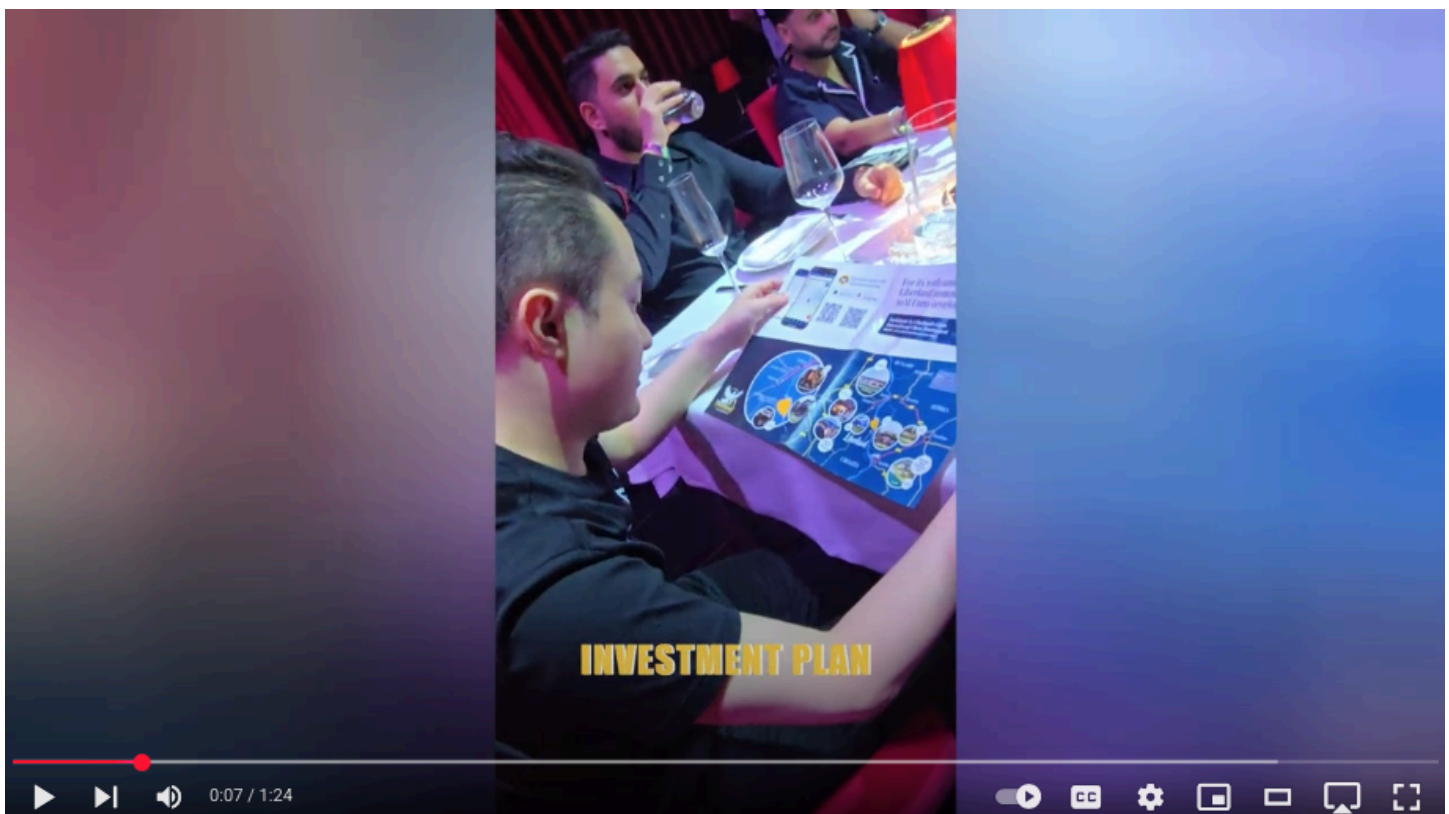
Oct 2022 – Present · 2 yrs 9 mos

Founded in 2013, Huobi Group is a world-leading company in the digital economy industry, with a mission to make breakthroughs in core blockchain technologies and integration of blockchain technology with other industries.

Following its acquisition on October 8th 2022, The Global Advisory Board was set up with key industry leaders that will aid in the strategic planning and developments, and to steer Huobi Global towards its success in the global market.

[LinkedIn Profile for Justin Sun, accessed [06/06/25](#)]

Vít Jedlička, Presenting Liberland's Development Plans To Justin Sun, Said “We Just Need To Keep Pushing And Show A Little Bit Of The Financial Power That Liberland Holds At This Stage.” “I have very good news for you. We actually received a communication from Croatia after a long time, positive communication from the highest places. So I'm very excited that things are moving forward. We just need to keep pushing and show a little bit of the financial power that Liberland holds at this stage.” [Liberland via YouTube, 05/21/25, accessed [06/04/25](#)]



[Liberland via YouTube, 05/21/25, accessed [06/04/25](#)]

Vít Jedlička Posted About The “Exciting Private Dinner” With Sun, Saying He Were Discussing “Major Investment Plans Into The Liberland Region”:



Vit Jedlicka ✓
@JedlickaVit



Very exciting private dinner today with [@justinsuntron](#) discussing with him major investment plans into the Liberland region.



5:01 PM · Apr 29, 2025 · 38.9K Views

[X post by @JedlickaVit, 04/29/25, accessed [06/04/25](#)]

Liberland Has Stated That The Development Plan Is “Backed By International Investors And Supporters Of The Liberland Initiative.” “The plan, backed by international investors and supporters of the Liberland initiative, proposes equal investment — roughly \$15 million each — in the border regions of Serbia and Croatia over the next two years.” [LiberlandTV via Medium, [05/22/25](#)]

Napredak Area 15 **Aerial View**

Apatin Block 15 is a tourism business park with sports and recreational contents of tourist and visitors to experience, the following are the three major building program:

1. Motel & Hotel & Lookout tower;
2. Yachting club & accompany facilities;
3. Adventure Park & Outdoor territories;



[LiberlandTV via Medium, [05/22/25](#)]

Liberland's Official X Account Shared The Video Of Vít Jedlička Sharing The Development Plans With Sun While Stating Liberland Was "In A Unique Position To Make It Happen":



7:52 AM · May 22, 2025 · 1,547 Views

[X post by @Liberland_org, 05/22/25, accessed [06/04/25](#)]

The Liberland Aid Foundation, A U.S.-Based 501(c)(3) Nonprofit Organization, Is Located In The Same Office As A Lobbying Firm That Has Lobbied Congress On Liberland's Recognition And Is Run By Two Liberland Ambassadors And Its Vice President, Who Don't Appear To Be Registered As Foreign Lobbyists.

The Liberland Aid Foundation Is Recognized By The IRS As A 501(c)(3) Tax-Exempt Organization And Operates From The Same Springfield, Illinois Office As Consulting Firm ATOLLEtc LLC.

June 2019: The Internal Revenue Service (IRS) Recognized The Liberland Aid Foundation As A 501(c)(3) Tax-Exempt Organization:

Dear Applicant:

We're pleased to tell you we determined you're exempt from federal income tax under Internal Revenue Code (IRC) Section 501(c)(3). Donors can deduct contributions they make to you under IRC Section 170. You're also qualified to receive tax deductible bequests, devises, transfers or gifts under Section 2055, 2106, or 2522. This letter could help resolve questions on your exempt status. Please keep it for your records.

[Internal Revenue Service, accessed [06/14/19](#)]

Liberland's Address Was 15 SW Old State Capitol Plz 2nd Fl, Springfield, IL As Of Its 2024 Tax Year:

Tax Year 2024 Form 990-N (e-Postcard)

Tax Period: 2024 (01/01/2024-12/31/2024)	Mailing Address: 15 SW Old State Capitol Plz 2nd Fl Springfield, IL 62701 United States	Gross receipts not greater than: \$50,000
EIN: 83-4626658		Organization has terminated: No
Organization Name (Doing Business as): LIBERLAND AID FOUNDATION INC	Principal Officer's Name and Address: Michael Alwood 800 S Glenwood Ave Springfield, IL 62704 United States	Website URL: https://www.liberlandaidfoundation.org

[Internal Revenue Service, accessed [05/12/25](#)]

Consulting Firm ATOLLEtc LLC Is Also Located At 15 SW Old State Capitol Plz 2nd Fl, Springfield, IL:

1. Limited Liability Company Name: ATOLLETC, LLC

[...]

3. Address of Principal Place of Business:

15 S. OLD STATE CAPTIAL PLZ 2ND FL SPRINGFIELD, IL 62701

[Illinois Secretary of State, [09/17/24](#)]

ATOLLEtc LLC Is "A Consulting Firm Collaborating With Like-Minded Companies And Individuals Located All Over The Globe." "ATOLLEtc LLC is a consulting firm collaborating with like-minded companies and individuals located all over the globe. ATOLLEtc LLC offers a wide variety of services and subject matter expertise that includes international relations, regulatory and legislative affairs, emerging technologies, energy, and critical infrastructure." [ATOLLEtc LLC, accessed [05/12/25](#)]

ATOLLetc LLC's CEO Kathleen Alcorn And Its Chief Operating Officer Michael Alwood Are Ambassadors At Large For Liberland And Its Federal Lobbyist Bogie Wozniak Is Liberland's Vice President, Who Appeared At Trump's Inauguration.

ATOLLetc LLC's Three Managers Are Kathleen Alcorn, Michael Alwood, And Boguslaw Bogie Wozniak:


4. Name and business address of all managers and any member having the authority of manager:

ALCORN, KATHLEEN 15 S. OLD STATE CAPTIAL PLZ 2ND FL	SPRINGFIELD, IL 62701
ALWOOD, MICHAEL 15 S. OLD STATE CAPTIAL PLZ 2ND FL	SPRINGFIELD, IL 62701
BOGUSLAW BOGIE WOZNIAK 15 S. OLD STATE CAPTIAL PLZ 2ND FL	SPRINGFIELD, IL 62701


[Illinois Secretary of State, [09/17/24](#)]

Alcorn, Alwood, And Wozniak Were ATOLLetc's Only Publicly-Listed Team Members As Of May 2025:


OUR TEAM



Kathleen Alcorn . Partner . CEO . Director of Public and Global Relations



Michael Alwood . Partner . Chief Operating Officer . Director of International Joint Ventures



Boguslaw Wozniak . Federal Lobbyist . International Affairs

[ATOLLetc, accessed [05/12/25](#)]

Kathleen Alcorn—Who Is Also “An Ambassador At Large For Liberland”—Is Partner, CEO, And Director Of Government And Global Relations For ATOLLetc LLC. “Kathleen Alcorn . Partner . CEO . Director of Government and Global Relations [...] She is an Ambassador At Large for Liberland, the first blockchain based country in the world, focusing upon digital identity systems.” [ATOLLetc LLC, accessed [05/12/25](#)]

Michael Alwood—Who Is “An Ambassador At Large for Liberland”—Is Partner And Chief Operating Officer For ATOLLetc LLC. “Michael Alwood . Partner . Chief Operating Officer . Director of International Joint Ventures Michael Alwood joined ATOLLetc LLC in 2023 through several collaborative international projects. His

focus is on energy, hybrid energy, agriculture, import and export of goods and services, humanitarian aid in the Dominican Republic, and a diplomatic liaison. Mike is an Ambassador At Large for Liberland, with a focus on energy initiatives.” [ATOLLetc LLC, accessed [05/12/25](#)]

Boguslaw Wozniak, ATOLLetc’s “Federal Lobbyist,” Is Liberland’s Vice President And “Plays A Crucial Role In Implementing The President’s Agenda, Overseeing Operations Across All Branches Of Government, And Representing Liberland On The Global Stage”:

Vice President

Boguslaw Wozniak

An accomplished entrepreneur and investor, Boguslaw Wozniak brings over 35 years of international experience in financial trade, logistics, transportation, safety, and production. Having held various leadership positions in American, Polish, and international corporations, Wozniak has been a staunch advocate for Liberland since its inception.

As Vice President, he plays a crucial role in implementing the President’s agenda, overseeing operations across all branches of government, and representing Liberland on the global stage.



[Free Republic of Liberland, accessed [05/12/25](#)]

January 2025: Liberland’s Official Site Reported That Its Vice President Bogie Wozniak Was At Donald Trump’s Inauguration And Shared A Picture Of Him At A Formal Event With Argentina’s President Javier Milei. “At Donald Trump’s inauguration, a symbolic meeting took place that has the libertarian world buzzing. Liberland’s Vice President Bogie Wozniak - as well as Liberland Finance Minister Navid Saberlin - crossed paths with Argentina’s reformist President Javier Milei, sparking speculation about the growing influence of libertarian ideals on the global stage.” [Free Republic of Liberland, [01/24/25](#)]



[Free Republic of Liberland, [01/24/25](#)]

In Q1 2025, ATOLLetc, Kathleen Alcorn, Boguslaw Wozniak, And Michael Alwood Lobbied Congress On Behalf Of Liberland, Explicitly Disclosing Liberland's Foreign Interest In Advancing Digital ID Systems.

In Q1 2025, ATOLLetc, Kathleen Alcorn, Boguslaw Wozniak, And Michael Alwood Lobbied Congress On Behalf Of Liberland On "Digital Identity Systems":

LOBBYING ACTIVITY. Select as many codes as necessary to reflect the general issue areas in which the registrant engaged in lobbying on behalf of the client during the reporting period. Using a separate page for each code, provide information as requested. Add additional page(s) as needed.

15. General issue area code FOR

16. Specific lobbying issues

Education on the importance digital identity systems and its positive impact for all peoples throughout the world.

17. House(s) of Congress and Federal agencies ☐ Check if None

U.S. SENATE, U.S. HOUSE OF REPRESENTATIVES

18. Name of each individual who acted as a lobbyist in this issue area

First Name	Last Name	Suffix	Covered Official Position (if applicable)	New
Kathleen	Alcorn			<input type="checkbox"/>
Michael	Alwood			<input type="checkbox"/>
Boguslaw "Bogie"	Wozniak			<input type="checkbox"/>

[Clerk of the House of Representatives, [03/15/25](#)]

- **ATOLLetc’s Lobbying Report Disclosed Liberland’s Foreign Interest, Claiming: “Liberland Is The First Blockchain Based Country In The World. Its Digital Id Based Initiative Is A Perfect Case Study For Other Governments To Follow.”**

19. Interest of each foreign entity in the specific issues listed on line 16 above ☐ Check if None

Liberland is the first blockchain based country in the world. Its digital ID based initiative is a perfect case study for other governments to follow. This system will support the human rights of all peoples in their ability to have autonomy during times of natural events or other events that may destroy proof of property, finances, land records, identity, etc. Liberland is seeking recognition on the state and federal levels as it works towards validity through international entities such as the United Nations and NATO. Liberland is located between Croatia and Serbia.

[Clerk of the House of Representatives, [03/15/25](#)]

In Q1 2025, Kathleen Alcorn, Boguslaw Wozniak, And Michael Alwood Lobbied Congress On “Recognition Of the First Blockchain Based Country,” With Liberland Claiming To Be “The First Nation To Draft Its Constitution Alongside Its Governance Platform, The Liberland Blockchain.”

In Q1 2025, Kathleen Alcorn, Boguslaw Wozniak, And Michael Alwood Lobbied Congress On Behalf Of ATOLLetc On “Recognition Of the First Blockchain Based Country”:

LOBBYING ACTIVITY. Select as many codes as necessary to reflect the general issue areas in which the registrant engaged in lobbying on behalf of the client during the reporting period. Using a separate page for each code, provide information as requested. Add additional page(s) as needed.

15. General issue area code FOR

16. Specific lobbying issues

Education on the importance of digital identity systems and its positive impact for all people throughout the world. Recognition of the first blockchain based country and also opening discussions on the regulatory platform for the metaverse.

17. House(s) of Congress and Federal agencies ☐ Check if None

U.S. SENATE, U.S. HOUSE OF REPRESENTATIVES

18. Name of each individual who acted as a lobbyist in this issue area

First Name	Last Name	Suffix	Covered Official Position (if applicable)	New
Kathleen	Alcorn			<input type="checkbox"/>
Boguslaw	Wozniak			<input type="checkbox"/>
Michael	Alwood			<input type="checkbox"/>

[Clerk of the House of Representatives, [03/15/25](#)]

Liberland Claims To Be “The First Nation To Draft Its Constitution Alongside Its Governance Platform, The Liberland Blockchain”:



[Free Republic of Liberland, accessed [05/12/25](#)]

ATOLLetc, Kathleen Alcorn, Boguslaw Wozniak, And Michael Alwood, Do Not Appear To Be Registered In The Federal Foreign Agents Registration Act (FARA) Database.

The Foreign Agents Registration Act (FARA) Was Enacted To “Reduce The Influence Of Foreign Propaganda” In The U.S., With Agents Of Foreign Principals Required To Register With The Federal Government. “In 1938, Congress enacted the Foreign Agents Registration Act (FARA) to reduce the influence of foreign propaganda circulating in the United States. Anticipating that greater transparency could help achieve these ends, Congress imposed new registration, reporting, and record-keeping requirements on individuals and entities acting within the United States on behalf of foreign interests. While the act has been amended many times, the early framework endures: persons defined as ‘agents’ of a ‘foreign principal’ must register with the U.S. government, make a public record of the nature of their principal-agent relationship, and maintain all private records for official inspection.” [Congress.gov, accessed [05/12/25](#)]

“Foreign Diplomats, Consular Officers, Or Other Recognized Officials And Staff” Are Not Required To Register Under FARA. “FARA provides that the following entities are not required to register under the act: [...] Foreign diplomats, consular officers, or other recognized officials and staff.” [Congress.gov, accessed [05/12/25](#)]

ATOLLEtc Did Not Appear In The U.S. Justice Department’s Foreign Agent Registration Act Database, As Of May 12, 2025:

Sorry, no results found for 'atolletc'. Try entering fewer or more general search terms.

Please also consider searching the Archive section of the Department website.

- [Department of Justice Archive](#)

[U.S. Department of Justice, accessed [05/12/25](#)]

The Terms “Alcorn,” “Allwood,” Or “Wozniak” Do Not Appear In The Registrant Name Field In FARA’s Database. [U.S. Department of Justice, accessed [05/12/25](#)]

The Term ATOLLEtc Does Not Appear In The Full-Text Search Field In FARA’s Database. [U.S. Department of Justice, accessed [05/12/25](#)]

Registrant Name	Client Name	Report Type	Amount Reported	Filing Year	Posted
ATOLLETC LLC	ATOLLETC LLC	1st Quarter - Report		2025	03/15/2025 @ 04:34 PM
ATOLLETC LLC	LIBERLAND	1st Quarter - Report		2025	03/15/2025 @ 04:38 PM
ATOLLETC LLC	ATOLLETC LLC	1st Quarter - Report		2024	04/05/2024 @ 02:53 PM
ATOLLETC LLC	ATOLLETC LLC	4th Quarter - Report		2024	12/30/2024 @ 01:50 PM
ATOLLETC LLC	ATOLLETC LLC	2nd Quarter - Amendment		2024	08/20/2024 @ 12:58 PM

ATOLLETC LLC	ATOLLETC LLC	1st Quarter - Amendment		2024	12/30/2024 @ 01:48 PM
ATOLLETC LLC	ATOLLETC LLC	3rd Quarter - Report		2024	10/01/2024 @ 01:00 PM
ATOLLETC LLC	ATOLLETC LLC	2nd Quarter - Report		2024	06/27/2024 @ 12:21 PM
ATOLLETC LLC	LIBERLAND	3rd Quarter - Report		2024	10/01/2024 @ 01:13 PM
ATOLLETC LLC	LIBERLAND	2nd Quarter - Report		2024	10/16/2024 @ 01:54 PM
ATOLLETC LLC	LIBERLAND	4th Quarter - Report		2024	12/30/2024 @ 01:53 PM
ATOLLETC LLC	LIBERLAND	1st Quarter - Report		2024	04/05/2024 @ 02:58 PM
ATOLLETC LLC	LIBERLAND	1st Quarter - Amendment		2024	06/27/2024 @ 12:23 PM
ATOLLETC LLC	ATOLLETC LLC	4th Quarter - Report		2023	04/05/2024 @ 02:51 PM
ATOLLETC LLC	ATOLLETC LLC	3rd Quarter - Report		2023	11/14/2023 @ 09:38 PM
ATOLLETC LLC	LIBERLAND	3rd Quarter - Report		2023	11/14/2023 @ 09:52 PM
ATOLLETC LLC	LIBERLAND	Registration		2023	07/10/2023 @ 12:35 PM
ATOLLETC LLC	LIBERLAND	4th Quarter - Report		2023	04/05/2024 @ 02:57 PM
ATOLLETC LLC	ATOLLETC LLC	2nd Quarter - Termination	\$10,000.00	2021	05/14/2021 @ 07:34 PM
ATOLLETC LLC	ATOLLETC LLC	1st Quarter - Report	\$10,000.00	2021	04/02/2021 @ 04:39 PM
ATOLLETC LLC	GOVERNMENT BLOCKCHAIN ASSOCIATION - SPRINGFIELD	2nd Quarter - Termination		2021	05/14/2021 @ 07:37 PM
ATOLLETC LLC	GOVERNMENT BLOCKCHAIN ASSOCIATION - SPRINGFIELD	1st Quarter - Report		2021	04/02/2021 @ 04:44 PM
ATOLLETC LLC	INTELLI-NETWORK CORPORATION	2nd Quarter - Termination		2021	05/14/2021 @ 07:40 PM
ATOLLETC LLC	INTELLI-NETWORK CORPORATION	1st Quarter - Report		2021	04/02/2021 @ 04:50 PM
ATOLLETC LLC	ATOLLETC LLC	3rd Quarter - Report	\$10,000.00	2020	11/04/2020 @ 03:21 PM
ATOLLETC LLC	ATOLLETC LLC	1st Quarter - Report (No Activity)	\$10,000.00	2020	04/19/2020 @ 06:12 PM

ATOLLETC LLC	ATOLLETC LLC	4th Quarter - Report	\$10,000.00	2020	01/31/2021 @ 07:45 PM
ATOLLETC LLC	ATOLLETC LLC	2nd Quarter - Report (No Activity)	\$10,000.00	2020	07/29/2020 @ 04:37 PM
ATOLLETC LLC	ATOLLETC LLC	Registration		2020	01/27/2020 @ 07:21 PM
ATOLLETC LLC	GOVERNMENT BLOCKCHAIN ASSOCIATION - SPRINGFIELD	3rd Quarter - Report		2020	11/04/2020 @ 12:55 PM
ATOLLETC LLC	GOVERNMENT BLOCKCHAIN ASSOCIATION - SPRINGFIELD	Registration		2020	02/07/2020 @ 02:35 PM
ATOLLETC LLC	GOVERNMENT BLOCKCHAIN ASSOCIATION - SPRINGFIELD	4th Quarter - Report		2020	02/16/2021 @ 02:19 PM
ATOLLETC LLC	GOVERNMENT BLOCKCHAIN ASSOCIATION - SPRINGFIELD	2nd Quarter - Report		2020	07/29/2020 @ 04:40 PM
ATOLLETC LLC	GOVERNMENT BLOCKCHAIN ASSOCIATION - SPRINGFIELD	1st Quarter - Report		2020	06/02/2020 @ 05:56 PM
ATOLLETC LLC	INTELLI-NETWORK CORPORATION	3rd Quarter - Report		2020	11/04/2020 @ 02:32 PM
ATOLLETC LLC	INTELLI-NETWORK CORPORATION	Registration		2020	07/29/2020 @ 04:58 PM
ATOLLETC LLC	INTELLI-NETWORK CORPORATION	4th Quarter - Report		2020	02/16/2021 @ 02:26 PM

The Emoluments Clause—Which Is Actually Three Provisions Barring Improper Foreign And Domestic Influence On Federal Officers—Covers “Private, Arm’s-Length Market Transactions” And Was Not Seriously Litigated Until Three Major Lawsuits Alleging Trump’s Properties Took Improper Payments From Foreign Governments During His First Term.

The Emoluments Clause Covers “Private, Arm’s-Length Market Transactions” And “Any Benefit, Gain, Or Advantage, Including Profits” Stemming From These Transactions, According To The Only Two District Courts To Weigh The Issue.

Black’s Law Dictionary, The “Leading Legal Dictionary,” Defines An Emolument As “An ‘Advantage, Profit, Or Gain Received As A Result Of One’s Employment Or One’s Holding Of Office.’” “Black’s Law Dictionary defines an ‘emolument’ as an ‘advantage, profit, or gain received as a result of one’s employment or one’s holding of office.’” [Congressional Research Service, [01/27/21](#)]

- **Black’s Law Dictionary Is “The Leading Legal Dictionary In The United States,” According To The Library Of Congress.** “Legal dictionaries provide definitions of legal terminology and words in their legal sense or use. They typically provide a short definition with reference to cases and other legal sources for authority, and frequently give examples of word usage in various legal situations. Black’s Law Dictionary is the leading legal dictionary in the United States.” [Library of Congress, [04/23/25](#)]

There Is Debate Over Whether Emoluments Include “Private, Arm’s-Length Market Transactions,” And The Only Two District Courts To Weigh In On The Issue Have Adopted “A Broad Definition Of ‘Emolument’ As Reaching Any Benefit, Gain, Or Advantage, Including Profits From Private Market Transactions Not Arising From An Office Or Employment.” “There is significant debate as to precisely what constitutes an emolument within the meaning of the Foreign and Domestic Emoluments Clauses, particularly as to whether it includes private, arm’s-length market transactions. The only two district courts to decide this issue (in *District of Columbia v. Trump* and *Blumenthal v. Trump*) adopted a broad definition of ‘emolument’ as reaching any benefit, gain, or advantage, including profits from private market transactions not arising from an office or employment, although higher courts have not weighed in on the issue.” [Congressional Research Service, [01/27/21](#)]

The Constitution’s Emoluments Clauses Include The The Foreign Emoluments Clause, Which Bars Gifts And Advantages From Foreign Officials; The Domestic Emoluments Clause, Which Bars Congress Or States From Raising Or Lowering The President’s Compensation; And The Ineligibility Clause, Which Bars Members Of Congress From Being Appointed To Federal Office.

The U.S. Constitution Mentions Emoluments In Three Provisions, Including The Foreign Emoluments Clause, The Domestic Emoluments Clause, And The Ineligibility Clause. “The Constitution mentions emoluments in three provisions, each sometimes referred to as the ‘Emoluments Clause.’” [Congressional Research Service, [01/27/21](#)]

- **The Foreign Emoluments Clause States That No U.S. Officer May Accept “Any Present, Emolument, Office, Or Title, Of Any Kind Whatever, From Any King, Prince, Or Foreign State.”** “The Foreign Emoluments Clause (art. I, § 9, cl. 8): ‘[N]o Person holding any Office of Profit or Trust under [the United States], shall, without the Consent of the Congress, accept of any present, Emolument, Office, or Title, of any kind whatever, from any King, Prince, or foreign State.’” [Congressional Research Service, [01/27/21](#)]
- **The Domestic Emoluments Clause, Also Known As The Presidential Emoluments Clause, States That The President’s Compensation May Not Be Increased Or Decreased During Their Term And That They May Not Receive Any Other Emolument From The U.S. Or Any Individual State.** “The Domestic Emoluments Clause (a.k.a. the Presidential Emoluments Clause) (art. II, § 1, cl. 7): ‘The President shall, at stated Times, receive for his Services, a Compensation which shall neither be encreased nor diminished during the Period for which he shall have been elected, and he shall not receive within that Period any other Emolument from the United States, or any of them.’” [Congressional Research Service, [01/27/21](#)]
- **The Ineligibility Clause States That No Member Of Congress May Be Appointed To A U.S. Office.** “The Ineligibility Clause (art. I, § 6, cl. 2): ‘No Senator or Representative shall, during the Time for which he was elected, be appointed to any civil Office under the Authority of the United States, which shall have been created, or the Emoluments whereof shall have been encreased during such time; and no Person holding any Office under the United States, shall be a Member of either House during his Continuance in Office.’” [Congressional Research Service, [01/27/21](#)]

The Foreign Emoluments Clause, Meant To “Prevent Corruption And Limit Foreign Influence On Federal Officers,” “Prohibits Federal Officers From Accepting Foreign Emoluments Without Congressional Consent.” “Each of the Emoluments Clauses has a distinct, but related, purpose. The purpose of the Foreign Emoluments Clause is to prevent corruption and limit foreign influence on federal officers. The Clause grew out of the Framers’ experience with the European custom of gift-giving to foreign diplomats, which the Articles of Confederation prohibited. Following that precedent, the Foreign Emoluments

Clause prohibits federal officers from accepting foreign emoluments without congressional consent.”
[Congressional Research Service, [01/27/21](#)]

The Domestic Emoluments Clause, Meant To “Preserve The President’s Independence,” Prevents Congress From Altering The President’s Salary And Prevents Sitting Presidents From Accepting Emoluments From Federal Or State Governments. “The purpose of the Domestic Emoluments Clause is to preserve the President’s independence. Under the Clause, Congress may neither increase nor decrease the President’s compensation during his term, preventing the legislature from using its control over the President’s salary to exert influence over him. To further preserve presidential independence, the Clause prohibits a sitting President from receiving emoluments from federal or state governments, except for his fixed salary.”
[Congressional Research Service, [01/27/21](#)]

The Ineligibility Clause, Meant To “Preserve The Separation Of Powers And Prevent Executive Influence On The Legislature,” “Prohibits Federal Officers From Simultaneously Serving As Members Of Congress.” “The purpose of the Ineligibility Clause is to preserve the separation of powers and prevent executive influence on the legislature (and vice versa). The Clause thus prohibits federal officers from simultaneously serving as Members of Congress. Moreover, a Member of Congress may not hold an office if it was established during his tenure or if the emoluments of that office were increased during his tenure.”
[Congressional Research Service, [01/27/21](#)]

The Foreign Emoluments Clause Applies To “Any Person Holding An ‘Office Of Profit Or Trust Under’ The United States,” And The U.S. Justice Department’s Office Of Legal Counsel Has Held That This Clause Applies To Salaried “‘Of Profit’” Officers, As Well As Officers “‘Of Trust,’” Who Are Appointed For Their “Discretion, Experience, And Skill.”

The Foreign Emoluments Clause “Applies To Any Person Holding An ‘Office Of Profit Or Trust Under’ The United States,” Although The Scope Of The Foreign Clause Is “Less Clear” Than The Domestic Emoluments And Ineligibility Clauses. “In terms of the persons to whom they apply, the scope of the Domestic Emoluments Clause and the Ineligibility Clause is clear from the Constitution’s text: The Domestic Emoluments Clause applies to the President, and the Ineligibility Clause applies to Members of Congress. The scope of the Foreign Emoluments Clause is less clear. By its terms, the Clause applies to any person holding an ‘Office of Profit or Trust under’ the United States.” [Congressional Research Service, [01/27/21](#)]

The Justice Department’s Office Of Legal Counsel (OLC) Has Determined The Foreign Emoluments Clause Applies To (1) Offices “‘Of Profit,’” Which Receive Salaries, And (2) Offices “‘Of Trust,’” Which Require “Discretion, Experience, And Skill.” “The prevailing view of the Clause is that this language reaches only federal, and not state, officeholders. According to the Department of Justice’s Office of Legal Counsel (OLC), which has a developed body of opinions on the Foreign Emoluments Clause, offices ‘of profit’ include those that receive a salary, while offices ‘of trust’ are those that require discretion, experience, and skill.” [Congressional Research Service, [01/27/21](#)]

There Is Disagreement Whether The Foreign Emoluments Clause Applies To Only Appointed Officers And Not Elected Officials, But The OLC Has Held That The Foreign Clause Applies To The President, With The Only District Court To Consider The Issue Agreeing. “There is disagreement, however, over whether elected federal officers, such as the President, are subject to the Foreign Emoluments Clause. Legal scholars have debated whether, as a matter of original public meaning, the Foreign Emoluments Clause reaches only appointed officers (and not elected officials). The OLC has generally presumed that the Foreign Emoluments Clause applies to the President, and the only district court to consider the issue (in *District of Columbia v. Trump*) came to the same conclusion.” [Congressional Research Service, [01/27/21](#)]

To Establish Standing In Lawsuits Alleging Emoluments Violations, Plaintiffs Must Show “Actual Or Imminent, Concrete, And Particularized” Personal Injury, Not A “Generalized Grievance” That Could Be Remedied Through Congressional Action.

It Is An “Open Question” Whether The Emoluments Clauses May Be Enforced Through Civil Litigation, With The Doctrine Of Standing Presenting “Significant Limitation On The Ability Of Public Officials Or Private Parties To Seek Judicial Enforcement” Of The Clauses. “Whether the Emoluments Clauses may be enforced through civil litigation is an open question. The doctrine of standing presents a significant limitation on the ability of public officials or private parties to seek judicial enforcement of the Emoluments Clauses. Standing is a threshold constitutional and prudential issue that concerns whether the person bringing suit has a legal right to a judicial ruling on the issues he has raised. Standing is grounded in Article III of the U.S. Constitution, which limits the exercise of federal judicial power to ‘cases’ and ‘controversies.’ [Congressional Research Service, [01/27/21](#)]

To Establish Standing, A Plaintiff Must Show Personal Injury That Is “Actual Or Imminent, Concrete, And Particularized,” And “Fairly Traceable” To Alleged Unlawful Conduct. “To establish the standing requirements of Article III, a plaintiff must identify a personal injury (referred to as an ‘injury-in-fact’) that is actual or imminent, concrete, and particularized. The injury must additionally be ‘fairly traceable’ to allegedly unlawful conduct of the defendant and ‘likely to be redressed by the requested relief.’” [Congressional Research Service, [01/27/21](#)]

Principles To Establish Standing Require That A Plaintiff “(1) Assert Her Own Legal Rights And Interests (As Opposed To Those Of A Third Party); (2) Complain Of Injuries That Fall Within The ‘Zone Of Interests’ Covered By The Legal Provision At Issue; And (3) Not Assert What Amounts To A ‘Generalized Grievance’” Better Addressed By Congress. “Beyond these constitutional standing requirements, courts have at times recognized a set of prudential principles relevant to the standing inquiry. In general, prudential principles require that the plaintiff (1) assert her own legal rights and interests (as opposed to those of a third party); (2) complain of injuries that fall within the ‘zone of interests’ covered by the legal provision at issue; and (3) not assert what amounts to a ‘generalized grievance[]’ more appropriately addressed by the representative branches of government.” [Congressional Research Service, [01/27/21](#)]

Different Plaintiffs Asserting Standing In Emoluments Clause Violations Have Had “Mixed Results,” Including Private Entities In Business Competition With The Defendant, States Asserting Violations Of Their “Quasi-Sovereign” Interests In The Federal System, And Members Of Congress Alleging They Were Deprived Of The Chance To Vote A Federal Office Holder Accepting Emoluments. “Different plaintiffs in Emoluments Clause cases have relied on various theories to support standing, with mixed results. Private parties, including business competitors, have asserted injuries in the form of increased competition and loss of business from the alleged constitutional violations. States have alleged injury to proprietary interests connected to ownership of competing businesses and harm to their ‘quasi-sovereign’ interests in the federal system, among other things. Some Members of Congress have relied on the alleged deprivation of their opportunity to vote on the acceptance of emoluments under the Foreign Emoluments Clause.” [Congressional Research Service, [01/27/21](#)]

There Were No “Substantial” Emoluments Lawsuits Until Trump’s First Term, When Three Major Lawsuits Alleged That Trump’s Properties Accepted Payments From Foreign Governments—Two Of These Cases Were Dismissed As Moot Following Trump’s 2020 Election Loss And The D.C. Circuit Held That Individual Members Of Congress May Not Allege Injury To Congress As A Whole.

There Was “No Substantial Litigation” On The Emoluments Clauses Until 2017, When “Private Parties, State Attorneys General, And Members Of Congress” Filed Lawsuits Against President Trump, Alleging That His Retention Of Certain Business And Financial Interests Violated The Domestic And Foreign Emoluments Clauses. “There had been no substantial litigation concerning the Emoluments Clauses until 2017, when a number of private parties, state attorneys general, and Members of Congress filed lawsuits against then-President Trump. These suits alleged that his retention of certain business and financial interests during his presidency—and his failure to seek congressional approval of interests relating to foreign governments—violated the Foreign and Domestic Emoluments Clauses.” [Congressional Research Service, [01/27/21](#)]

Three Major Lawsuits Alleging That Trump Violated Of The Emoluments Clauses Were Filed, With The Supreme Court Ordering Appellate Courts To Dismiss Two Of The Cases As Moot Following Trump’s 2020 Loss And With The Supreme Court Denying Review Of A Third Case. “Three major federal lawsuits concerning the Emoluments Clauses were filed. Following the swearing-in of President Joe Biden in January 2021, however, the Supreme Court instructed the appellate courts to dismiss two of the cases as moot, and denied review in a third case that had been dismissed by a lower court.” [Congressional Research Service, [01/27/21](#)]

Citizens for Responsibility & Ethics in Washington (CREW) v. Trump: CREW, Along With Organizations And Individuals Linked to Hospitality Industries, Alleged That Trump Violated The Domestic And Foreign Emoluments Clauses When His Properties Accepted Payments From The Federal Government And From Foreign Government Officials. “In Citizens for Responsibility & Ethics in Washington (CREW) v. Trump, No. 17-CV-458 (S.D.N.Y.), a nonprofit government ethics watchdog, along with various organizations and individuals associated with the hospitality industries in New York and Washington, DC, alleged violations of the Domestic and Foreign Emoluments Clauses through then-President Trump’s receipt of payments from the federal government and various foreign government officials at different Trump Organization properties.” [Congressional Research Service, [01/27/21](#)]

- **Plaintiffs Alleged That Trump’s International Hotel In Washington D.C. Violated The Domestic Emoluments Clause Through Its Lease With The Federal General Services Administration And Violated The Foreign Emoluments Clause** “For example, plaintiffs alleged that the Trump International Hotel’s continuing lease with the General Services Administration violated the Domestic Emoluments Clause, and that payments for services made to the Trump International Hotel by agents of foreign governments violated the Foreign Emoluments Clause.” [Congressional Research Service, [01/27/21](#)]
- **Trump Claimed That Plaintiffs Lacked Standing And That “Arm’s-Length Commercial Transactions” Did Not Qualify As Emoluments, But The U.S. Court Of Appeals For The Second Circuit Held That The Hospitality Industry Plaintiffs Had Standing Due The Competitive Harm Posed By Trump’s Businesses.** “Then-President Trump moved to dismiss the suit, asserting that the plaintiffs lacked standing, and that the term ‘emoluments’ did not extend to arm’s-length commercial transactions. The district court dismissed the case for lack of standing, but the U.S. Court of Appeals for the Second Circuit reversed, holding that the hospitality-industry plaintiffs had standing based on a theory of competitive harm resulting from the allegedly unlawful conduct.” [Congressional Research Service, [01/27/21](#)]
- **January 2025: The Supreme Court Granted Certiorari To The Case, But Vacated The Second Circuit’s Judgment And Ordered The Circuit To Dismiss The Case As Moot Due To The End Of Trump’s First Term In Office.** “On January 25, 2021, the Supreme Court granted certiorari, vacated the Second Circuit’s judgment without addressing the merits, and remanded the case to the appellate court with instructions to dismiss the case as moot in light of the end of Mr. Trump’s term as President.” [Congressional Research Service, [01/27/21](#)]

District of Columbia v. Trump: D.C. And The State Of Maryland Alleged Trump Violated The Foreign And Domestic Emoluments Clauses, Similar To CREWS's Lawsuit Alleging That Trump's Properties Accepted Payments From The Federal Government And From Foreign Government Officials. "In District of Columbia v. Trump, No. 17-1596 (D. Md.), the District of Columbia and the State of Maryland sued then-President Trump, alleging violations of the Foreign and Domestic Emoluments Clauses similar to those alleged in the CREW lawsuit." [Congressional Research Service, [01/27/21](#)]

- **The District Court Held That Plaintiffs Had Standing Through Alleged Injuries Posed By The Trump International Hotel In Washington D.C. And That "Emolument" Included Any "Profit, Gain, Or Advantage, Of More Than De Minimis Value."** "Then-President Trump moved to dismiss based on standing and a failure to state a claim. In a series of rulings, the district court held that the plaintiffs had standing based on alleged injuries related to the Trump International Hotel and that the plaintiffs had stated a claim because the term 'emolument' reached any 'profit, gain, or advantage, of more than de minimis value.'" [Congressional Research Service, [01/27/21](#)]
- **The Supreme Court Ordered The Fourth Circuit To Dismiss The Case As Moot Following The End Of Trump's First Term In Office.** "After the full Fourth Circuit declined to order the district court to certify an immediate appeal, then-President Trump sought review from the Supreme Court. Following the swearing-in of President Biden, the Supreme Court vacated the Fourth Circuit's judgment and remanded with instructions to dismiss the case as moot." [Congressional Research Service, [01/27/21](#)]

Blumenthal, et al. v. Trump: Members Of Congress Alleged That Trump Violated The Foreign Emoluments Clause When His Properties Accepted Payments From Foreign Governments, Including "Foreign Licensing Fees, And Regulatory Benefits, Among Other Things." "In Blumenthal, et al. v. Trump, No. 17-1154 (D.D.C.), 201 Members of Congress alleged violations of the Foreign Emoluments Clause through then-President Trump's receipt of foreign-government payments at Trump properties, foreign licensing fees, and regulatory benefits, among other things." [Congressional Research Service, [01/27/21](#)]

- **The District Court Ruled That The Members Of Congress Had Standing, Holding That They Were Deprived Of The Opportunity To Vote On Trump's Acceptance Of Foreign Emoluments.** "Then-President Trump moved to dismiss on the grounds that the plaintiffs lacked standing and that he had not received any prohibited "emoluments." The district court ruled that the plaintiffs had standing, reasoning that these Members of Congress suffered an injury-in-fact through the deprivation of a voting opportunity under the Foreign Emoluments Clause, and that the plaintiffs had stated a claim against the President." [Congressional Research Service, [01/27/21](#)]
- **The U.S. Court Of Appeals For The D.C. Circuit Reversed The District Court's Ruling On Standing, Holding That Individual Members Of Congress "May Not Sue Based On Alleged Institutional Injury To The Legislature As A Whole."** "On appeal, the U.S. Court of Appeals for the D.C. Circuit reversed the district court's standing decision, holding that the Members lacked standing because individual Members of Congress may not sue based on alleged institutional injury to the legislature as a whole." [Congressional Research Service, [01/27/21](#)]
- **The Supreme Court Denied Review Of The D.C. Circuit's Ruling.** "The Supreme Court denied review in Blumenthal in October 2020." [Congressional Research Service, [01/27/21](#)]