

SCHEDULE C

Definitions

As used in these document requests, the following terms shall be interpreted in accordance with these definitions:

1. “58th Presidential Inaugural Committee” means the entity registered under FEC ID # C00629584 as well as its parent companies, subsidiary companies, affiliated entities, agents, officials, and instrumentalities.
2. “And,” and “or,” shall be construed broadly and either conjunctively or disjunctively to bring within the scope of this request any information that might otherwise be construed to be outside its scope. The singular includes plural number, and vice versa. The masculine includes the feminine and neutral genders.
3. “Any” includes “all,” and “all” includes “any.”
4. “Business Interests” as to a person shall include any entity disclosed on Schedules 2, 3 or 6 of that person’s Public Financial Disclosure Reports (OGE Form 278e) filed in 2016 (if any), 2017, and 2018.
5. “Communication(s)” shall mean the transmittal of information by any means, whether oral, electronic, by document or otherwise, and whether in a meeting, by telephone, facsimile, mail, releases, electronic message including email, text message, instant message, MMS or SMS message, encrypted message, message application, social media, or otherwise.
6. The terms “Company” and “Companies” shall mean the named legal entity as well as any units, firms, partnerships, associations, corporations, limited liability companies, trusts, subsidiaries, affiliates, divisions, departments, branches, joint ventures, proprietorships, syndicates, or other legal, business or government entities over which the named legal entity exercises control or in which the named entity has any ownership whatsoever.
7. “Describe” shall include a request for a complete description and explanation of the facts, circumstances, analysis, opinion, and other information relating to (as that phrase is defined below) the subject matter of a request for identification of any documents used to formulate that description and explanation.
8. “Document” is defined to be synonymous in meaning and equal in scope to the usage of the term “documents or electronically stored information” in Fed. R. Civ. P. 34(a)(1)(A). A draft or non-identical copy is a separate document within the meaning of this term.
9. “Each” shall be construed to include “every,” and “every” shall be construed to include “each.”

10. “Emolument” for purposes of these document requests shall mean any profit, gain, or advantage that is received directly or indirectly, from any foreign government, or any state or local government, or from any instrumentality thereof, including payments arising from commercial transactions at fair market value. For purposes of these document requests, emoluments having a monetary value of \$20 or less may be omitted.
11. The term “employee” means any past or present agent, borrowed employee, casual employee, consultant, contractor, de facto employee, detailee, fellow, independent contractor, intern, joint adventurer, loaned employee, officer, part-time employee, permanent employee, provisional employee, special government employee, subcontractor, or any other type of service provider.
12. “Government” shall include any government’s present and former agencies, branches, units, divisions, subdivisions, districts, public corporations, employees, elected and appointed officials, ambassadors, diplomats, emissaries, authorities, agents, assignees, and instrumentalities. This includes, but is not limited to, any government-controlled business entities, entities in which the government has a financial interest, and any person acting or purporting to act on the government’s behalf.
13. The term “including” shall be construed broadly to mean “including, but not limited to.”
14. The term “individual” means all natural persons and all persons or entities acting on their behalf.
15. The term “person” or “persons” means natural persons, firms, partnerships, associations, corporations, subsidiaries, division, departments, joint ventures proprietorships, syndicates, or other legal business or government entities, and all subsidiaries, affiliates, divisions, departments, branches, or other units, thereof.
16. “Present,” for purposes of these document requests, anything having a *de minimis* monetary value of \$20 or less may be omitted.
17. “Relating to” shall mean discussing, describing, reflecting, containing, analyzing, studying, reporting, commenting, evidencing, constituting, comprising, showing, setting forth, considering, recommending, concerning, or pertinent to that subject in any manner whatsoever.
18. “The Russian Federation” shall include the Government of the Russian Federation, as the term “Government” is defined above.
19. “SDNY Investigations” shall include any investigation or prosecution conducted by the U.S. Attorney’s Office for the Southern District of New York relating to: (i) Michael Cohen; (ii) the Trump Organization; (iii) the Trump Campaign; and (iv) the 58th Presidential Inaugural Committee.

20. “Trump Campaign” for purposes of these document requests shall include Donald J. Trump for President, Inc., as well as its parent companies, subsidiary companies, affiliated entities, agents, officials, and instrumentalities.
21. The “Trump Organization” for purposes of these document requests shall include the Trump Organization, Inc., The Trump Organization LLC, and their parent companies, subsidiary companies, affiliated entities, agents, officials, and instrumentalities.
22. The “Trump Transition” for purposes of these document requests shall include Trump for America, Inc., as well as its parent companies, subsidiary companies, affiliated entities, agents, officials, and instrumentalities.