



Absent any written direction, the opportunity for a demagogue to exert undue influence is great. Behind the curtain, there are no reliable methods to limit the defendant's ability to exploit the prejudice and ignorance of those just entering into public service.

At a minimum, the defendant should not be allowed entry into the White House until all those assigned to work in the new administration have a fair opportunity to define a baseline set of policies, standards and procedures they will support in their assigned roles.

The cost of chaos at this juncture may be substantial, and the defendant has a reputation for creating disorder: in 2014, he openly stated that he wants "to bring everything crashing down, and destroy all of today's establishment." While it is easy to dismiss such a statement as hyperbole or as a calculated appeal for publicity, it betrays a deep seated wish to undermine the integrity of our democratic process.

Given the opportunity for significant harm, and the absence of practical experience the defendant can bring to his new role, it is only prudent to limit the risk we may accept by granting him unfettered access to the White House. Should the President wish to consult with the defendant on any pressing issues, he may do so using secured communication methods administered by the Secret Service.

This request is unusual, if not unprecedented. As we have seen, however, this is not a typical transition. The President-elect, as well as many he is considering for cabinet level positions, have no little or no background in federal service or current security clearances. As such, the circumstances warrant an elevated level of caution in order to allay the well-founded fears of the populace and to create an atmosphere where all voices may be heard.

Those new to the Executive office may struggle to express their ideas, and should not have to confront a figure as polarizing as the defendant as they begin their service to our nation. It can

only inhibit progress and drive the use of simple solutions to address the complex problems our nation faces.

The defendant's history of using a high profile media outlet to support morally questionable positions makes his presence in the White House of special concern. Unless the defendant is willing to forgo all efforts to publish content in a public forum while serving in his nominative role, any communication he may have with the President or other White House staff should be monitored and recorded, so as to provide a basis for determining if any security protocols have been compromised or to defend against any charges of libel.

To sum up, it is not necessary for the defendant to physically occupy an office in the facility at 1600 Pennsylvania Avenue in order to serve his country, if that is, in fact, his intent.

A temporary restraining order is necessary to preserve the *status quo*, to prevent the irreparable injury to the public that would result from the defendant misdirecting the newly elected President, his cabinet and local staff.

The requested order would offer the defendant some measure of protection as well. In the first months of an administration, there will exist many opportunities for ill-advised or illegal action. If the defendant is not physically present, he would not be subject to charges of aiding or abetting the criminal activity of others, who must also establish trustworthiness in a new context.

A minimum threshold of ninety days is requested, and the people also request a formal release from the bench to lift any order.

We leave it up to the court to decide if the defendant should be kept at a safe distance while the new occupants of the White House earn their stripes.