

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF FLORIDA**

Civil Action No. 1:21-cv-22441-RNS

DONALD J. TRUMP, the Forty-Fifth President  
of the United States, LINDA CUADROS,  
AMERICAN CONSERVATIVE UNION,  
RAFAEL BARBOZA, DOMINICK LATELLA,  
WAYNE ALLEN ROOT AND NAOMI WOLF,  
INDIVIDUALLY AND ON BEHALF OF  
THOSE SIMILARLY SITUATED,

Plaintiffs,

v.

TWITTER, INC. and JACK DORSEY,

Defendants.

**DECLARATION OF CHRISTL PITRE MAHFOUZ**

Pursuant to 28 U.S.C. § 1746, I hereby declare as follows:

1. My name is Christl Pitre Mahfouz, and I am the Manager, CEO, and sole Member of Ace Specialties, L.L.C., a Louisiana limited liability company domiciled in Lafayette, Louisiana ("Ace Specialties").
2. In my capacity as Manager, CEO, and Member of Ace, I am responsible for managing and overseeing all operations of Ace Specialties and have personal knowledge of the matters contained in this Declaration.

3. Ace Specialties was formed in 2007 and provided workwear and promotional products for oilfield businesses along the Gulf Coast.
4. Ace Specialties' business grew and thrived until the economic downturn of 2015 when Louisiana's oil and gas industry was hit especially hard. In 2015, Ace Specialties was on the brink of closing its business due to the downturn.
5. On June 16, 2015, I watched Donald J. Trump take his famous ride down the escalator in Trump Tower as he announced his candidacy for President of the United States. I knew Eric Trump from his efforts to raise money for St. Jude Children's Research Hospital in conjunction with Sky High, Inc. d/b/a Sky High for St. Jude's, a nonprofit organization I helped start with friends and business acquaintances. With this connection, I and my team immediately began designing logos, printing products, and creating a merchandise site with the hope of Ace Specialties potentially doing business with Donald J. Trump's campaign.
6. On July 22, 2015, I pitched Ace Specialties' business to Donald J. Trump's campaign team in Trump Tower.
7. After committing to starting operations within a week, the pitch was a success, and Ace Specialties became the exclusive distributor of campaign merchandise for the Donald J. Trump campaign, breathing new life into Ace Specialties' business, as well as the Trump presidential campaign.
8. Ace Specialties has served as the exclusive distributor of campaign merchandise for the Donald J. Trump campaign since 2015 under contracts with certain campaign entities, including Donald J. Trump for President, Inc. and Trump Make America Great Again Committee, a federal joint fundraising committee composed of and authorized by the

Republican National Committee and Donald J. Trump for President (collectively referred to as "the Trump Campaign").

9. The Trump Campaign procured and maintained the domain name and website [www.shop.donaldjtrump.com](http://www.shop.donaldjtrump.com) which operated as its website for soliciting and raising federal political contributions for the Trump Campaign's participating committees in exchange for various merchandise and products to be shipped to donors.
10. Ace Specialties warehoused, fulfilled, packaged, managed and distributed all merchandise for the Trump Campaign, including serving as distributor of all merchandise at the rallies for the Trump Campaign throughout the United States.
11. All merchandise for the Trump Campaign was required to be made in the USA and was sourced from various businesses in the United States, including CaliFame of Carson, California who manufactured all MAGA headwear.
12. Examples of Trump Campaign merchandise distributed by Ace Specialties is attached as Exhibit A *in globo*.
13. All Trump Campaign merchandise was required to be shipped via U.S. Postal Service, and Ace Specialties therefore utilized USPS exclusively for all Trump Campaign merchandise shipping.
14. The Trump Campaign contracted with Shopify to provide the platform (i.e., ecommerce store website) for the Trump Campaign, which included the merchandise distributed by Ace Specialties. Ace Specialties therefore directly utilized Shopify's services and tied into Shopify's platform. The Trump Campaign also utilized WinRed's platform.
15. The Trump Campaign contracted with Stripe, Inc. to provide the payment processing platform for the Trump Campaign's Shopify website which served to process all payments

to the Trump Campaign. Stripe, Inc. also provided payment processing services for the WinRed platform.

16. The Trump Campaign led the promotion and online marketing for the Trump Campaign and its merchandise, and Ace Specialties was kept apprised of merchandise-related promotional and marketing efforts, including the Trump Campaign's regular use of Facebook, Twitter, and YouTube to promote campaign merchandise.
17. The Trump Campaign's advertising on social media sites such as Facebook, Twitter, Instagram, and YouTube utilized links in which prospective donors were led to the Trump Campaigns' Shopify and WinRed donation and merchandise platforms.
18. A report generated by Shopify of Trump Campaign donations "by sales channel" for the year 2020 reported significant donations from "Facebook," "Twitter," and "YouTube." This report does not include donations linked to WinRed's platform via Facebook, Twitter, or YouTube.
19. On or about January 7, 2021, Ace Specialties was made aware that Facebook blocked President Trump's ability to utilize his Facebook account.
20. On or about January 7, 2021, Shopify shut down the Trump Campaign's donation and merchandise website, on information and belief and based on news reports, following Facebook's lead.
21. On or about January 8, 2021, Ace Specialties was made aware that Twitter had permanently suspended President Trump's account "@realDonaldTrump."
22. On or about January 10, 2021, Ace Specialties was made aware that Stripe, Inc. had unilaterally terminated payment processing for the Trump Campaign's websites.

23. On or about January 12, 2021, Ace Specialties was made aware that Google had suspended President Trump's YouTube account.
24. To my knowledge, Facebook, Google, Twitter, and other social platforms did not block or prevent the promotion or sales of Trump-related merchandise through parties other than the Trump Campaign ("knockoffs").
25. The foregoing actions taken by the big tech companies, including the blocking and/or suspension of President Trump's Facebook, Twitter and YouTube accounts, led to the demise of the Trump Campaign merchandising and fundraising program, and caused Ace Specialties to suffer a devastating interruption and loss of revenue. The U.S. vendors which supplied merchandise for the Trump Campaign also suffered an immediate interruption and loss of business as well.
26. After January 6, 2021, Ace Specialties has been unable to realize any revenue, and the Trump Campaign and has suffered financial losses as a result.
27. As a result of the loss of Trump Campaign business by big tech censorship, Ace Specialties also lost its volume discount with the U.S. Post Office.
28. Despite Ace Specialties beginning to perform similar distribution services for Trump-related merchandise in April 2021 for Save America JFC, a joint fundraising committee of Save America and Make America Great Again ("Save America"), Ace Specialties will be unable to recover the economic losses sustained due to the loss of revenue from the Trump Campaign. Ace revenue loss is directly linked to the Trump donation losses.
29. In 2015, the Trump Campaign saved and revitalized my small, woman-owned business. However, due to the foregoing actions of the big tech companies, Ace Specialties has suffered substantial financial losses.

30. I declare under penalty of perjury that the foregoing is true and correct.

Executed on the 13<sup>th</sup> day of August, 2021.

  
CHRISTL PITRE MAHFOUZ

**EXHIBIT A**  
**to Declaration of Christl Pitre Mahfouz**





