

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

JOYCE BEATTY,

*Plaintiff,*

v.

DONALD J. TRUMP *et al.*,

*Defendants.*

No. 25 Civ. 4480 (CRC)

**NOTICE OF SUPPLEMENTAL AUTHORITY IN SUPPORT OF PLAINTIFF'S  
MOTION FOR TEMPORARY RESTRAINING ORDER**

Plaintiff files this Notice to apprise the Court of a newly identified documents relevant to Defendants' contention that it was a "longstanding practice" that ex officio members of the Board of Trustees ("the Board") of the John F. Kennedy Center for the Performing Arts ("the Center") were non-voting members. Defs' Resp. at 4 (ECF No. 19). Plaintiff is cognizant of the considerable time pressures facing the Court and the fact that the pending Motion for Temporary Restraining Order is already under advisement. Plaintiff therefore submits this brief notice only to bring to the Court's attention documents submitted by Defendants to the Internal Revenue Service that bears directly on issues presently before the Court. Plaintiff apologizes for any inconvenience caused by this supplemental filing.

Attached hereto are copies of the Kennedy Center's Form 990 for tax years 2022 and 2023, dated August 14, 2024, and August 12, 2025, respectively (see Part II of both forms). In line 3 of Part I, both forms report that the Kennedy Center had **59** "voting members of the governing body." That figure corresponds to the combined number of the 36 presidentially appointed general trustees, 20 U.S.C. § 76h(a)(2)(L), and ex officio members identified in the

statute, *id.* § 76h(a)(2)(A)-(K). These forms are available at

<https://projects.propublica.org/nonprofits/organizations/530245017>. No form for tax year 2025

is yet available on that website.

In addition, in Part VI, the Form 990 states “If there are material differences in voting rights among members of the governing body, or if the governing body delegated broad authority to an executive committee or similar committee, explain in Schedule O.” The corresponding Schedule Os for each tax year—which are available at the same website listed above—do not make any references to “material differences in voting rights.”

Dated: March 13, 2026

Respectfully submitted,

/s/ Norman Eisen

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*\* Application for admission forthcoming;  
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