

IN THE SUPERIOR COURT OF THE DISTRICT OF COLUMBIA  
Civil Division

<p>DISTRICT OF COLUMBIA,</p> <p>Plaintiff,</p> <p>v.</p> <p><b>58TH PRESIDENTIAL INAUGURAL COMMITTEE et al.,</b></p> <p>Defendants.</p>	<p>Civil Action No.: 2020 CA 000488 B Judge José M. López Next Event: Dispositive Motions Decided Date: May 10, 2021</p>
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**PRAECIPE**

The District of Columbia (District), through its Attorney General, files this Praecipe to respectfully request that the Clerk of Court docket the attached Exhibit B. This exhibit was filed (*in camera*) in support of the District's Motion for Summary Judgment and is now being publicly filed in the absence of any actual confidentiality designations. The attached Exhibit B replaces the previous version indicating it was filed *in camera*.

Date: April 20, 2021

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that on April 20, 2021, I caused to be served true and correct copies of the foregoing Praeceptum to be served by CaseFileXpress on all counsel of record.

*/s/ Leonor Miranda* \_\_\_\_\_  
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# Exhibit B

IN THE SUPERIOR COURT OF THE DISTRICT OF COLUMBIA  
Civil Division

DISTRICT OF COLUMBIA,	:	
	:	
Plaintiff,	:	
	:	Civil Action No:
v.	:	2020 CA 000488 B
	:	Judge Jose M. Lopez
58th PRESIDENTIAL	:	
INAUGURAL COMMITTEE,	:	
et al.,	:	
	:	
Defendants.	:	
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CONFIDENTIAL

Videotaped Video Teleconference

Deposition of IVANKA TRUMP,

Tuesday, December 1, 2020

10:18 a.m.

Job No. 49515

Reported by: Donna A. Peterson, Notary Public for  
the District of Columbia

<p style="text-align: right;">2</p> <p>1 The Deposition of IVANKA TRUMP, 2 taken by: 3 4 THE DISTRICT OF COLUMBIA 5 OFFICE OF THE ATTORNEY GENERAL 6 Office of Public Advocacy 7 400 6th Street, N.W. 8 Washington, D.C. 20001 9 (202) 727-3400 10 11 12 13 14 15 Pursuant to Notice, before Donna A. 16 Peterson, Notary Public in and for the District of 17 Columbia, via Webex video teleconference. The 18 witness appeared via video teleconference from 19 Washington, D.C. All counsel and the videographer 20 appeared via video teleconference. 21 22</p>	<p style="text-align: right;">4</p> <p>1 APPEARANCES CONTINUED 2 3 ON BEHALF OF DEFENDANTS 58th PRESIDENTIAL 4 INAUGURAL COMMITTEE and THE WITNESS: 5 K. LEE BLALACK, II, ATTORNEY at LAW 6 O'MELVENY &amp; MYERS, LLP 7 1625 Eye Street, N.W. 8 Washington, D.C. 20006 9 Telephone: (202) 383-5300 10 lblalack@omm.com 11 12 ON BEHALF OF DEFENDANTS TRUMP ORGANIZATION and 13 TRUMP INTERNATIONAL HOTEL: 14 REBECCA WOODS, ATTORNEY at LAW 15 SEYFARTH SHAW, LLP 16 975 F Street, N.W. 17 Washington, D.C. 20004 18 Telephone: (202) 463-2400 19 rwoods@seyfarth.com 20 21 22</p>
<p style="text-align: right;">3</p> <p>1 APPEARANCES 2 3 ON BEHALF OF PLAINTIFF, DISTRICT OF 4 COLUMBIA: 5 JENNIFER JONES, SENIOR TRIAL COUNSEL 6 LEONOR MIRANDA, ASSISTANT ATTORNEY GENERAL 7 MATT JAMES, ASSISTANT ATTORNEY GENERAL 8 JIMMY R. ROCK, ASSISTANT DEPUTY ATTORNEY 9 GENERAL 10 NICOLE HILL, ASSISTANT ATTORNEY GENERAL 11 DISTRICT OF COLUMBIA, OFFICE OF THE 12 ATTORNEY GENERAL 13 Public Advocacy Division 14 400 6th Street, N.W. 15 Washington, D.C. 20001 16 Telephone: (202) 727-3400 17 jen.jones@dc.gov 18 leonor.miranda@dc.gov 19 matthew.james2@dc.gov 20 jimmy.rock@dc.gov 21 22</p>	<p style="text-align: right;">5</p> <p>1 APPEARANCES CONTINUED 2 3 4 ON BEHALF OF THE TRUMP ORGANIZATION: 5 ALAN F M. GARTEN, ATTORNEY at LAW 6 FEDDER AND GARTEN, P A. 7 Suite 200 8 10096 Red Run Boulevard 9 Owings Mills, Maryland 21117 10 AGarten@fedgar.com 11 Telephone: (410) 539-288 12 13 14 15 ALSO PRESENT: Joe Townsend, Videographer 16 17 18 19 20 21 22</p>



10		12			
1	Foundation case?	10:21:21	1	although I think your attorney is in the room with	10:23:43
2	<b>A. I don't believe so, no.</b>	10:21:22	2	you, but just give a small pause between the question	10:23:46
3	Q. Okay. How long ago were these	10:21:25	3	and the answer to give your attorney a chance to	10:23:50
4	depositions?	10:21:32	4	object, if she needs to, and make sure he question	10:23:52
5	<b>A. Over four years.</b>	10:21:33	5	is complete. Again, because of the delay, it's a	10:23:54
6	Q. Did any of the depositions involve a Trump	10:21:35	6	little bit awkward. Just something to keep in mind.	10:23:57
7	hotel?	10:21:44	7	<b>A. Okay, thank you.</b>	10:24:03
8	<b>A. It -- not that I recall.</b>	10:21:46	8	Q. What did you do to prepare for your	10:24:04
9	Q. Okay. Did they involve the Trump	10:21:54	9	deposition today?	10:24:06
10	Organization?	10:21:57	10	<b>A. I met with my counsel.</b>	10:24:07
11	<b>A. They involved one of the entities of -- of</b>	10:21:57	11	Q. And who is your counsel?	10:24:12
12	<b>the Trump Organization.</b>	10:22:03	12	<b>A. Alan Garten and Rebecca Woods.</b>	10:24:14
13	Q. What entity is that?	10:22:05	13	Q. Are those the only two attorneys you met	10:24:20
14	<b>A. I -- there have been a few different</b>	10:22:07	14	with?	10:24:31
15	<b>depositions on -- on different matters, some related</b>	10:22:11	15	<b>A. Yes.</b>	10:24:32
16	<b>to Trump, others related to ancillary things that --</b>	10:22:15	16	Q. And when did you meet with them?	10:24:33
17	<b>that I was asked to come for a deposition, so I'm</b>	10:22:19	17	<b>A. Yesterday.</b>	10:24:40
18	<b>sure we can provide you a list of them, if -- if the</b>	10:22:22	18	Q. Did you review any documents to prepare	10:24:42
19	<b>lawyers are comfortable with that.</b>	10:22:25	19	for your deposition?	10:24:47
20	Q. Okay. Well, I'm going to go through a	10:22:27	20	<b>A. A couple.</b>	10:24:49
21	couple of ground rules anyway, even though it sounds	10:22:30	21	MS. JONES: And Rebecca, were those	10:24:53
22	like you're well versed in the deposition taking but	10:22:32	22	documents all documents that are in the production?	10:24:55
11		13			
1	I'll just go through a couple.	10:22:38	1	MS. WOODS: They were. Except for one	10:24:58
2	Of course I'm going to ask you a series of	10:22:40	2	super secret one that you can't know about.	10:25:02
3	questions today. I'm not ever trying to trick you or	10:22:43	3	MS. JONES: Okay. Well, we'll talk --	10:25:05
4	confusing, so if I ask something that doesn't make	10:22:47	4	THE WITNESS: She is just being facetious.	10:25:09
5	sense, just ask me to rephrase it and I'll, I'll try	10:22:49	5	MS. JONES: We'll definitely talk off the	10:25:13
6	and do better.	10:22:52	6	record about that one, Rebecca.	10:25:14
7	I'll need you to answer all the questions	10:22:54	7	MS. WOODS: Okay.	10:25:17
8	verbally so that it can be captured on the record, so	10:22:56	8	BY MS. JONES:	10:25:18
9	head nods or "uh-huhs" won't get captured accurately.	10:22:59	9	Q. Did you talk to anyone else about your	10:25:19
10	So I just ask that you answer out loud. Do you	10:23:04	10	deposition?	10:25:20
11	understand?	10:23:07	11	<b>A. No.</b>	10:25:20
12	<b>A. I do.</b>	10:23:08	12	Q. Have you spoken with anyone at Trump Hotel	10:25:21
13	Q. That was the first test. You passed it.	10:23:09	13	about your deposition?	10:25:24
14	If you need a break at any time, just let	10:23:17	14	<b>A. No.</b>	10:25:26
15	me know. We can take a break whenever. I would just	10:23:19	15	Q. Did you speak with anyone who's already	10:25:26
16	ask that if there is a question on the table or a	10:23:21	16	been deposed in this case about their deposition?	10:25:29
17	series of questions, we get through those first and	10:23:23	17	<b>A. No.</b>	10:25:32
18	then we'll take a break, but just let me know if you	10:23:25	18	Q. Did you speak with anyone at the Trump	10:25:33
19	need one, okay?	10:23:27	19	Organization about your deposition today?	10:25:36
20	<b>A. Thank you.</b>	10:23:28	20	<b>A. No.</b>	10:25:38
21	Q. Given the fact that this is a virtual	10:23:28	21	Q. Did you speak with anyone at the Trump	10:25:40
22	deposition and I -- we have a delay in your video,	10:23:36	22	Organization about a deposition that they have given	10:25:42



14	<p>1 in this case? 10:25:44</p> <p>2 <b>A. No.</b> 10:25:45</p> <p>3 <b>Q.</b> Did you speak with anyone in your family 10:25:47</p> <p>4 about this deposition? 10:25:49</p> <p>5 <b>A. I did not.</b> 10:25:51</p> <p>6 <b>Q.</b> You didn't discuss it with your father? 10:25:52</p> <p>7 <b>A. I did not.</b> 10:25:56</p> <p>8 <b>Q.</b> Or your brothers? 10:25:57</p> <p>9 <b>A. No.</b> 10:25:59</p> <p>10 <b>Q.</b> So other than the things that we've 10:25:59</p> <p>11 discussed, did you do anything else to prepare for 10:26:09</p> <p>12 your deposition today? 10:26:11</p> <p>13 <b>A. I did not.</b> 10:26:12</p> <p>14 <b>Q.</b> I'll run through just a few abbreviations 10:26:13</p> <p>15 that I'll use to make sure we're on the same page. 10:26:19</p> <p>16 You're aware of the 58th Presidential 10:26:22</p> <p>17 Inaugural Committee, correct? 10:26:28</p> <p>18 <b>A. Yes.</b> 10:26:28</p> <p>19 <b>Q.</b> And if I call that the PIC, will you 10:26:29</p> <p>20 understand what I'm talking about? 10:26:31</p> <p>21 <b>A. Sure.</b> 10:26:33</p> <p>22 <b>Q.</b> If I refer to the Trump International 10:26:33</p>
15	<p>1 Hotel in Washington, D.C. or the Trump old post 10:26:38</p> <p>2 office LLC, if I refer to that just as Trump Hotel, 10:26:42</p> <p>3 will you understand that I'm talking about this hotel 10:26:46</p> <p>4 in D.C.? 10:26:48</p> <p>5 <b>A. Sure.</b> 10:26:49</p> <p>6 <b>Q.</b> And we will probably talk about a few of 10:26:51</p> <p>7 the other Trump Hotels and when we talk about o her 10:26:53</p> <p>8 ones, I'll -- we can specify which ones those are. 10:26:55</p> <p>9 <b>A. Okay, thank you.</b> 10:26:58</p> <p>10 <b>Q.</b> The Trump Organization, LLC, is it okay if 10:26:59</p> <p>11 I refer to that as "Trump Org"? 10:27:06</p> <p>12 <b>A. Absolutely, sure.</b> 10:27:09</p> <p>13 <b>Q.</b> And also, when I refer to the 10:27:10</p> <p>14 inaugura ion, I'm referring to he entire week of 10:27:15</p> <p>15 inaugural events, from the, from the 2016 -- or 10:27:18</p> <p>16 excuse me, inauguration, is that fair? 10:27:23</p> <p>17 <b>A. Sure.</b> 10:27:27</p> <p>18 <b>Q.</b> Okay. And again, if, for some reason, I'm 10:27:28</p> <p>19 specifying a day or -- or a time, I'll specify that, 10:27:31</p> <p>20 but, otherwise, I just mean the entire week of 10:27:35</p> <p>21 events. 10:27:38</p> <p>22 <b>A. Okay.</b> 10:27:39</p>
16	<p>1 <b>Q.</b> Okay. Can you give, provide for me the 10:27:39</p> <p>2 e-mail addresses that you use for any work 10:27:52</p> <p>3 conversations you may have had about the 10:27:58</p> <p>4 inauguration. 10:28:02</p> <p>5 <b>A. The e-mail address would have been</b> 10:28:03</p> <p>6 [REDACTED] 10:28:09</p> <p>7 <b>Q.</b> Do you have any other e-mail addresses 10:28:13</p> <p>8 that you may have used? 10:28:14</p> <p>9 <b>A. At that time, that was my only e-mail</b> 10:28:16</p> <p>10 <b>address. I have, subsequent to that in, some time in</b> 10:28:19</p> <p>11 <b>mid January, knowing that I was leaving the company,</b> 10:28:24</p> <p>12 <b>I created a new e-mail address as I was terminating</b> 10:28:28</p> <p>13 <b>the old one.</b> 10:28:31</p> <p>14 <b>Q.</b> And what e-mail address was that? 10:28:32</p> <p>15 <b>A. That is</b> [REDACTED] 10:28:34</p> <p>16 <b>Q.</b> Did you have any other e-mail addresses at 10:28:45</p> <p>17 the time? 10:28:47</p> <p>18 <b>A. Not active, no.</b> 10:28:48</p> <p>19 <b>Q.</b> Did you ever, did you ever get assigned a 10:28:51</p> <p>20 PIC e-mail address? 10:28:56</p> <p>21 <b>A. No.</b> 10:28:57</p> <p>22 <b>Q.</b> When you -- did you ever text people -- 10:28:59</p>
17	<p>1 well, when you texted people in regard to inaugural 10:29:09</p> <p>2 events, what cell phone number would you have used 10:29:13</p> <p>3 for that? 10:29:16</p> <p>4 <b>A. I would have used</b> [REDACTED] . 10:29:18</p> <p>5 <b>Q.</b> And is that the only cell number you would 10:29:28</p> <p>6 have used for texting? 10:29:32</p> <p>7 <b>A. Yes.</b> 10:29:33</p> <p>8 <b>Q.</b> Did you use any other forms of 10:29:33</p> <p>9 communication to talk about the inauguration? 10:29:36</p> <p>10 <b>A. No.</b> 10:29:42</p> <p>11 <b>Q.</b> I'll be honest, hat is kind of a broad 10:29:44</p> <p>12 question. 10:29:51</p> <p>13 Any other apps, like instant messaging 10:29:51</p> <p>14 apps? 10:29:55</p> <p>15 <b>A. No.</b> 10:29:55</p> <p>16 <b>Q.</b> Can you tell me about your education? 10:29:59</p> <p>17 <b>A. I attended The Chapin School in New York,</b> 10:30:02</p> <p>18 <b>then subsequently I went to boarding school, Choate</b> 10:30:09</p> <p>19 <b>Rosemary Hall in Wallingford, Connecticut.</b> 10:30:14</p> <p>20 <b>Subsequent to that I went to Georgetown University</b> 10:30:15</p> <p>21 <b>for two years and then to the University of</b> 10:30:18</p> <p>22 <b>Pennsylvania to Wharton for the final two years.</b> 10:30:21</p>

18		20			
1	Q. And what did you major in?	10:30:25	1	<b>first couple of years of – of a job, really just</b>	10:33:09
2	<b>A. I majored in real estate and finance, but</b>	10:30:27	2	<b>learning as much as I – I possibly could from people</b>	10:33:13
3	<b>I got a bachelor of science.</b>	10:30:34	3	<b>who had far more experience than I.</b>	10:33:16
4	Q. You got your bachelor's from the	10:30:38	4	Q. So when you say working through leases,	10:33:21
5	University of Pennsylvania?	10:30:40	5	were you helping to draft contracts or --	10:33:29
6	<b>A. Yes.</b>	10:30:42	6	<b>A. No. I'm not a lawyer. I would be helping</b>	10:33:30
7	Q. Do you have any other degrees?	10:30:43	7	<b>to negotiate them. I'd be meeting with prospective</b>	10:33:32
8	<b>A. I'm sorry, bachelor of arts. I got a B.A.</b>	10:30:48	8	<b>tenants, I would be thinking about space layout. So</b>	10:33:36
9	<b>from the University of Pennsylvania.</b>	10:30:51	9	<b>those sorts of things.</b>	10:33:42
10	Q. Okay. Do you have any other degrees?	10:30:53	10	Q. Okay.	10:33:44
11	<b>A. I do not.</b>	10:31:01	11	<b>A. I was doing the same at Forest City, I was</b>	10:33:45
12	Q. Can you guide me through your work	10:31:02	12	<b>helping on a shopping center project, thinking about</b>	10:33:48
13	history. We don't have to go back to any high school	10:31:12	13	<b>the space needs of tenants and how to meet their</b>	10:33:52
14	jobs, but after college, what -- tell me a little bit	10:31:14	14	<b>needs in those lease negotiations.</b>	10:33:56
15	about your -- your work life.	10:31:17	15	Q. So in the commercial real estate -- and	10:34:00
16	<b>A. I worked at Forest City Ratner Companies</b>	10:31:20	16	that's what you were dealing in, right, commercial	10:34:08
17	<b>in Brooklyn, New York for a little over a year right</b>	10:31:27	17	real estate?	10:34:11
18	<b>out of college in real estate development. And</b>	10:31:32	18	<b>A. Commercial and residential.</b>	10:34:11
19	<b>subsequent to that I joined the family business, the</b>	10:31:36	19	Q. Okay. I'm just trying to get an	10:34:13
20	<b>Trump Organization.</b>	10:31:39	20	understanding -- okay.	10:34:19
21	Q. I should have asked, when did you graduate	10:31:43	21	<b>A. Forest city was primarily commercial,</b>	10:34:21
22	from University of Pennsylvania?	10:31:45	22	<b>anything that I worked on.</b>	10:34:24
19		21			
1	<b>A. In 2004.</b>	10:31:47	1	Q. So were you working -- like to -- to, I	10:34:26
2	Q. And so you -- you joined the family	10:31:49	2	guess, sell the leases of space to people or were you	10:34:31
3	business in roughly 2006, is that accurate?	10:31:55	3	working more on creating spaces?	10:34:34
4	<b>A. That's -- that's accurate.</b>	10:31:58	4	<b>A. Both. And it wasn't -- it didn't stop at</b>	10:34:36
5	Q. What did you do when you first joined the	10:32:02	5	<b>that. I -- my older brother, Don, has been in the</b>	10:34:41
6	family business?	10:32:05	6	<b>company several years prior, so I spent quite a bit</b>	10:34:44
7	<b>A. I cut my teeth on some of the -- the</b>	10:32:06	7	<b>of time with him learning. And it -- we have a very</b>	10:34:48
8	<b>lower-level, more simple tasks, and shadowed several</b>	10:32:15	8	<b>entrepreneurial culture at the Trump Organization, so</b>	10:34:55
9	<b>people within the organization as I learned, not too</b>	10:32:18	9	<b>there's latitude to take things on as long as you</b>	10:34:58
10	<b>similar to what I was doing at Forest City. And</b>	10:32:22	10	<b>deliver, and I would take on a lot of tasks that</b>	10:35:01
11	<b>eventually over time, I -- I took on more</b>	10:32:25	11	<b>other people were less interested in and I think I</b>	10:35:07
12	<b>responsibility as -- as time passed, but in the early</b>	10:32:28	12	<b>was able to deliver on those and -- and gain more</b>	10:35:09
13	<b>days, I -- I was really in a support, in a support</b>	10:32:32	13	<b>responsibility and slowly -- and slowly do more at</b>	10:35:11
14	<b>role to other executives.</b>	10:32:36	14	<b>the, at the company over time.</b>	10:35:19
15	Q. What did you do in that support role?	10:32:40	15	Q. What -- what kind of, can you give me some	10:35:21
16	Like what, cutting your teeth on lower-level tasks,	10:32:42	16	examples of some of the tasks you took on that others	10:35:24
17	what does that mean?	10:32:45	17	didn't want that you delivered on?	10:35:26
18	<b>A. Well, I worked through leases. I would --</b>	10:32:46	18	<b>A. Hmm. Well, I think, you know, a lot of, a</b>	10:35:28
19	<b>I was learning about construction and development,</b>	10:32:51	19	<b>lot of the more mundane work as -- as part of larger</b>	10:35:34
20	<b>acquisitions, extending what I had learned in -- in</b>	10:32:55	20	<b>projects, I -- I would try to assist on. And I think</b>	10:35:39
21	<b>university and in my first job in real estate</b>	10:33:00	21	<b>that's my advice to a lot of people, do the things</b>	10:35:46
22	<b>finance. So I was doing what most people do in the</b>	10:33:05	22	<b>that other people are less excited to do in -- in the</b>	10:35:48

22	<p>1 early days and -- and create, and just be as helpful 10:35:50</p> <p>2 as possible. As I said before, I -- I spent a lot of 10:35:58</p> <p>3 time shadowing those who were in the business, in 10:36:02</p> <p>4 some cases for -- for decades, and seeking to learn 10:36:06</p> <p>5 from them as it's a family business and I was hoping 10:36:11</p> <p>6 to grow into a role with more responsibility. So it 10:36:13</p> <p>7 was, it was a great early couple of years, but there, 10:36:17</p> <p>8 there were no, there was no defined job description 10:36:23</p> <p>9 in a certain sense in that I was able to take on a 10:36:25</p> <p>10 lot of things and gain exposure to a lot of different 10:36:28</p> <p>11 people, given the entrepreneurial culture there. 10:36:35</p> <p>12 Q. Did you have a job title when you first 10:36:37</p> <p>13 started? 10:36:39</p> <p>14 A. I don't remember what my first job title 10:36:39</p> <p>15 was. I'm sure I did. 10:36:52</p> <p>16 Q. What was your first job title in the 10:36:55</p> <p>17 organization? 10:36:56</p> <p>18 A. Probably vice president and alternately 10:36:57</p> <p>19 executive vice president when I left. I ended up 10:37:02</p> <p>20 focusing most of my time on development and 10:37:09</p> <p>21 acquisition. So I was executive vice president of 10:37:12</p> <p>22 development and acquisition. 10:37:15</p>
23	<p>1 Q. And what does that mean, development and 10:37:16</p> <p>2 acquisitions? 10:37:20</p> <p>3 A. Well, it is obviously quite broad. But I 10:37:21</p> <p>4 was doing a lot of work on the construction and 10:37:32</p> <p>5 development, the vision for -- for a project and then 10:37:34</p> <p>6 the execution of that vision. As is the case in the 10:37:36</p> <p>7 Old Post Office, which was a project whose 10:37:43</p> <p>8 development I was very intimately involved in and 10:37:45</p> <p>9 whose acquisition I was very intimately involved in 10:37:48</p> <p>10 as we sought to, as a very competitive RFP process, 10:37:50</p> <p>11 secure the opportunity to -- to realize what is now 10:37:56</p> <p>12 this hotel. 10:38:00</p> <p>13 Q. And just what does "RFP" stand for? 10:38:06</p> <p>14 A. Request for a proposal. 10:38:08</p> <p>15 Q. Have you fulfilled in your -- let me back 10:38:10</p> <p>16 up. 10:38:17</p> <p>17 So when you acquire a property and develop 10:38:17</p> <p>18 it, what goes into determining which property to -- 10:38:23</p> <p>19 to get? 10:38:31</p> <p>20 A. Quite a lot. First and foremost, the 10:38:35</p> <p>21 location is -- is critical, as we develop luxury real 10:38:40</p> <p>22 estate. So having a great location to either 10:38:45</p>
24	<p>1 construct a new project on or -- or rehabilitate or 10:38:53</p> <p>2 renovate an existing structure, as is the case in 10:38:56</p> <p>3 Trump D.C. So location, the market viability, the 10:38:59</p> <p>4 competition within that market, and if there's an 10:39:05</p> <p>5 opportunity to -- to differentiate that which we -- 10:39:08</p> <p>6 we build. So we are -- we were very selective as an 10:39:11</p> <p>7 organization in terms of the projects we -- we took 10:39:16</p> <p>8 on, really wanting to wait to acquire or build the 10:39:18</p> <p>9 best in those marketplaces. 10:39:25</p> <p>10 Q. When you say you looked at market 10:39:28</p> <p>11 viability, what does that mean? 10:39:30</p> <p>12 A. Well, can market the support a five-star 10:39:33</p> <p>13 luxury hotel or a super high-end condominium 10:39:39</p> <p>14 building? And there -- there are many good markets 10:39:43</p> <p>15 and maybe even great markets where you can acquire an 10:39:47</p> <p>16 amazing parcel of land but the demand isn't, isn't 10:39:51</p> <p>17 there for what we build and the demand would be there 10:39:56</p> <p>18 for -- for a different type of product. So you have 10:39:59</p> <p>19 to make sure that in the case of a hotel that you're 10:40:01</p> <p>20 building in a market that you think either has the 10:40:04</p> <p>21 potential to achieve the -- the rates that -- that 10:40:06</p> <p>22 you're positioning or building the product to or 10:40:13</p>
25	<p>1 currently has it based on -- on the competitors. 10:40:16</p> <p>2 Q. How do you, how do you go about 10:40:19</p> <p>3 determining that? 10:40:24</p> <p>4 A. It's a due-diligence process that is 10:40:26</p> <p>5 customary prior to an acquisition or to a development 10:40:30</p> <p>6 project. So you make an assessment. A lot of times, 10:40:34</p> <p>7 especially in the real estate business, you spend 10:40:39</p> <p>8 some time in the market. Two things will be actually 10:40:40</p> <p>9 walking it and spending time physically present 10:40:45</p> <p>10 and -- and obviously looking at -- at the competitive 10:40:50</p> <p>11 set and tracking their performance and -- and 10:40:54</p> <p>12 benchmarking against that. 10:40:58</p> <p>13 Q. How do you, how do you track a 10:41:03</p> <p>14 competitor's performance? Like, how do you, how do 10:41:04</p> <p>15 you -- how do you determine if that will work? 10:41:07</p> <p>16 A. Well, some of it is anecdotal, you will 10:41:11</p> <p>17 ask around. People who work in -- in -- in, on those 10:41:14</p> <p>18 projects. It's, for example, you're selling 10:41:21</p> <p>19 condominiums, you will ask brokers in the market. In 10:41:24</p> <p>20 other cases, there are companies who provide that 10:41:28</p> <p>21 information. In the case of, in the case of whether 10:41:32</p> <p>22 it's condominiums or hotels, you can, you can get 10:41:39</p>

26	<p>1 that information through third parties that will show 10:41:43</p> <p>2 you the, the performance of other properties in the 10:41:47</p> <p>3 market based on the concept you're looking at, what 10:41:50</p> <p>4 you would view as the sort of potentially competitive 10:41:55</p> <p>5 projects and they can provide you with that 10:41:58</p> <p>6 information. 10:42:01</p> <p>7 Q. You mentioned that you worked on the Trump 10:42:03</p> <p>8 Hotel in D.C. We'll talk about the development of 10:42:10</p> <p>9 that one, but before Trump Hotel, did you acquire and 10:42:15</p> <p>10 develop any other hotels? 10:42:19</p> <p>11 A. Yes. I was, was in charge, alongside my 10:42:20</p> <p>12 father, with the acquisition of Doral in Miami, 10:42:31</p> <p>13 Florida, which was -- which was a project that was 10:42:36</p> <p>14 happening roughly at the same time we were, we were 10:42:39</p> <p>15 developing it as the Old Post Office Building. So 10:42:44</p> <p>16 during that period of time, within those same four or 10:42:48</p> <p>17 five years. Doral was -- was being also renovated, 10:42:51</p> <p>18 it was an existing structure that we were 10:42:57</p> <p>19 rehabilitating. 10:42:59</p> <p>20 And, and then I worked on other projects, 10:43:00</p> <p>21 from Trump Chicago, to Trump Las Vegas, in -- in 10:43:05</p> <p>22 support roles. 10:43:12</p>
27	<p>1 Q. Okay. So did you lead the Doral project? 10:43:14</p> <p>2 A. I would say "lead" is loosely defined, but 10:43:21</p> <p>3 I was charged with the acquisition, working alongside 10:43:27</p> <p>4 my family members, but yes. 10:43:31</p> <p>5 Q. Okay. And then the Trump Chicago and 10:43:33</p> <p>6 Trump Las Vegas, you were in more of a supporting 10:43:36</p> <p>7 role in those two? 10:43:38</p> <p>8 A. Exactly. 10:43:39</p> <p>9 Q. And then -- 10:43:44</p> <p>10 A. And then several other small projects, 10:43:44</p> <p>11 renovations of, of existing hotels, et cetera. 10:43:46</p> <p>12 Q. What other hotels, when you say smaller, 10:43:49</p> <p>13 existing hotels, which other hotels were you involved 10:43:58</p> <p>14 in? 10:44:01</p> <p>15 A. You asked me about development, so 10:44:02</p> <p>16 renovating hotel rooms at other properties and, in 10:44:03</p> <p>17 some cases, on a -- on a larger scale, Trump 10:44:07</p> <p>18 International was being renovated, all of the rooms 10:44:13</p> <p>19 in Trump International in New York. So I would 10:44:16</p> <p>20 oversee that process as, as well. 10:44:20</p> <p>21 Q. Okay. But they were, they were all still 10:44:24</p> <p>22 Trump properties? 10:44:27</p>
28	<p>1 A. They were Trump properties. I was also 10:44:28</p> <p>2 involved in -- in properties where there were 10:44:31</p> <p>3 licensed agreements and not Trump-owned properties 10:44:35</p> <p>4 but where the hotel company was hired as an operator. 10:44:38</p> <p>5 Q. What does that mean? 10:44:45</p> <p>6 A. Similar to a Four Seasons, a lot of times 10:44:47</p> <p>7 they will manage a hotel for -- for third parties. 10:44:56</p> <p>8 But the role for me in those cases was not the hotel 10:44:59</p> <p>9 operations -- there was a team for that, it was 10:45:03</p> <p>10 the -- the vision for, for the project, which you 10:45:06</p> <p>11 would collaborate with the developer to -- to create 10:45:09</p> <p>12 in accordance with your brand standards. 10:45:12</p> <p>13 Q. Okay. So would your, would your brand 10:45:16</p> <p>14 still be on the hotel, on he, like, marquee outside, 10:45:18</p> <p>15 is it still a Trump Hotel? 10:45:22</p> <p>16 A. Yeah, exactly. Like a Ritz Carlton or a 10:45:24</p> <p>17 Four Seasons, they most often don't own the property 10:45:28</p> <p>18 but they are involved in, sometimes, the vision, 10:45:34</p> <p>19 sometimes not -- depends on when they come in, if 10:45:39</p> <p>20 they come in later or early, and the operation of the 10:45:41</p> <p>21 brand. 10:45:47</p> <p>22 Q. I see. So the Trump Chicago and the Trump 10:45:49</p>
29	<p>1 Las Vegas, those are Trump Organization-owned hotels? 10:45:55</p> <p>2 A. Well, they're owned by -- by the entity 10:45:59</p> <p>3 that -- that they are. So whatever that LLC, 10:46:05</p> <p>4 whatever that entity is. 10:46:10</p> <p>5 Q. Is that, is that the same thing what you 10:46:28</p> <p>6 mean by licensing? So the Trump Las Vegas, for 10:46:30</p> <p>7 example, it's owned by somebody other than Trump 10:46:34</p> <p>8 Organization? 10:46:38</p> <p>9 A. No. It's -- Trump Las Vegas is -- is 10:46:38</p> <p>10 owned by, by an entity that it was, it was not -- we 10:46:45</p> <p>11 were the developers of that project, unlike in a 10:46:52</p> <p>12 license deal where we would not be the developers. 10:46:55</p> <p>13 Q. Okay. You can tell that I'm not in real 10:46:59</p> <p>14 estate. 10:47:06</p> <p>15 So let's say about the Doral in Miami, 10:47:12</p> <p>16 that's -- is that a five-star hotel that was -- 10:47:15</p> <p>17 A. It was, it was built to a five-star 10:47:22</p> <p>18 standard. 10:47:25</p> <p>19 Q. And you said that was around the same time 10:47:25</p> <p>20 as the Trump Hotel in D.C.? 10:47:28</p> <p>21 A. Yes. 10:47:30</p> <p>22 Q. Did you have any role in -- so I know we 10:47:31</p>

30	<p>1 talked about the development of these hotels and the</p> <p>2 acquisition of some of them. Do you have -- did you</p> <p>3 have any role in operating the hotels?</p> <p>4 <b>A. No. We had -- we hired a great team to</b></p> <p>5 <b>oversee operation within the company.</b></p> <p>6 <b>Q. And is that -- and we'll go into these</b></p> <p>7 <b>entities, but is that the Trump Hotel LLC?</b></p> <p>8 <b>A. I would have to look, I -- I don't know, I</b></p> <p>9 <b>don't know the entity name.</b></p> <p>10 <b>Q. Is that the entity that Mr. Danziger works</b></p> <p>11 <b>for?</b></p> <p>12 <b>A. I don't know. Likely yes, I would think.</b></p> <p>13 <b>But I don't, I don't know.</b></p> <p>14 <b>Q. Can you just help me understand the</b></p> <p>15 <b>organizational structure. So when you say you hire a</b></p> <p>16 <b>great team --</b></p> <p>17 <b>A. Yes.</b></p> <p>18 <b>Q. Do you mean a great team to run all the</b></p> <p>19 <b>hotels or individual teams for each hotel?</b></p> <p>20 <b>A. Well, both. There's -- there's a</b></p> <p>21 <b>corporate team that then oversees the operation on an</b></p> <p>22 <b>individual asset level.</b></p>	32	<p>1 Were you in charge of the Trump, of</p> <p>2 acquiring and developing the Trump Hotel in D.C.?</p> <p>3 <b>A. I was, alongside, of course, my father,</b></p> <p>4 <b>and my brothers were, were involved. But I was, I</b></p> <p>5 <b>was the point person on it, yes.</b></p> <p>6 <b>Q. How did you determine that the market</b></p> <p>7 <b>could handle a hotel like the Trump Hotel?</b></p> <p>8 <b>A. Well, D.C. is a very strong market and</b></p> <p>9 <b>there were luxury competitors within the market</b></p> <p>10 <b>already, but there was no product that was at the</b></p> <p>11 <b>level that we wanted to create, which really created</b></p> <p>12 <b>what we believed was an enormous opportunity in that</b></p> <p>13 <b>many of the brands were here, but we knew that what</b></p> <p>14 <b>we could build would be better than that which was</b></p> <p>15 <b>here and -- and what was here already was doing quite</b></p> <p>16 <b>well from a rate perspective. So that's a unique, a</b></p> <p>17 <b>really unique opportunity, because a lot of times,</b></p> <p>18 <b>you're just hoping to compete head-on.</b></p> <p>19 <b>In this case, we believed we could -- I</b></p> <p>20 <b>like to say we always believe we can do better, but,</b></p> <p>21 <b>in this case, it was the quality of product that was</b></p> <p>22 <b>here was inferior to -- to what we would see from</b></p>
31	<p>1 <b>Q. And did -- were you involved in hiring the</b></p> <p>2 <b>corporate team?</b></p> <p>3 <b>A. Yes.</b></p> <p>4 <b>Q. And who, who did you hire on the corporate</b></p> <p>5 <b>team to oversee it?</b></p> <p>6 <b>A. Eric Danziger.</b></p> <p>7 <b>Q. Do you recall when you hired him,</b></p> <p>8 <b>approximately?</b></p> <p>9 <b>A. I don't.</b></p> <p>10 <b>Q. He was hired after the -- I mean, you had</b></p> <p>11 <b>hotels before you hired him, correct?</b></p> <p>12 <b>A. Yes.</b></p> <p>13 <b>Q. And who was running the hotels before</b></p> <p>14 <b>Danziger was in charge?</b></p> <p>15 <b>A. There was a gentleman named Jim Petrus.</b></p> <p>16 <b>Q. Can you spell that?</b></p> <p>17 <b>A. P-E-T-R-U-S.</b></p> <p>18 <b>Q. And what was the first name?</b></p> <p>19 <b>A. Jim.</b></p> <p>20 <b>Q. So -- so you and your brothers and your</b></p> <p>21 <b>father -- scratch that, I'll go into more detail on</b></p> <p>22 <b>that in a minute.</b></p>	33	<p>1 <b>those same brands in markets like New York, Chicago,</b></p> <p>2 <b>even. So we thought that was a great opportunity.</b></p> <p>3 <b>Q. They were inferior but were they -- am I</b></p> <p>4 <b>understanding correctly that they were still charging</b></p> <p>5 <b>a high-enough rate that made it seem like this was a</b></p> <p>6 <b>viable market?</b></p> <p>7 <b>A. The benchmark rates or the average rate</b></p> <p>8 <b>was -- was still good. But we believed that with a</b></p> <p>9 <b>stronger product that we could do materially better</b></p> <p>10 <b>than -- than what currently existed, and -- and that</b></p> <p>11 <b>was, that was a great, that was a great challenge for</b></p> <p>12 <b>us, and obviously this building is -- is incomparable</b></p> <p>13 <b>in terms of its architecture, really couldn't build</b></p> <p>14 <b>it today.</b></p> <p>15 <b>It's an incredible iconic structure in an</b></p> <p>16 <b>amazing location, right on, right on Pennsylvania</b></p> <p>17 <b>Avenue. So -- so we were very excited for the</b></p> <p>18 <b>opportunity to -- to create something far better</b></p> <p>19 <b>than -- than the market, which was already a good</b></p> <p>20 <b>market. So -- so we thought it was, was really a</b></p> <p>21 <b>double win.</b></p> <p>22 <b>Q. So when you -- when you develop one of</b></p>

34	<p>1 these hotels -- and we'll talk about the Trump Hotel 10:53:35</p> <p>2 in D.C., since that was a project that you led, 10:53:38</p> <p>3 what's involved in developing? I mean, are you 10:53:43</p> <p>4 working with interior designers or, like, how do you, 10:53:46</p> <p>5 how do you do it? 10:53:50</p> <p>6 <b>A. Well, it's a long process. In this case, 10:53:53</b></p> <p>7 <b>it started with, as I mentioned, a request for a 10:53:58</b></p> <p>8 <b>proposal. So this was, you had to really be 10:54:01</b></p> <p>9 <b>passionate and really believe in the potential, to go 10:54:04</b></p> <p>10 <b>through such a long, cumbersome process with -- that 10:54:07</b></p> <p>11 <b>was very time consuming and with many great 10:54:12</b></p> <p>12 <b>competitors, really best-in-class competitors, 10:54:14</b></p> <p>13 <b>without any certainty of securing the rights to 10:54:19</b></p> <p>14 <b>develop. So that in itself was a long process. 10:54:29</b></p> <p>15 <b>And as part of that we -- we really 10:54:31</b></p> <p>16 <b>thought about what was the highest and best use for, 10:54:37</b></p> <p>17 <b>for this building, and we believed that was -- was a 10:54:40</b></p> <p>18 <b>hotel, with a little bit of retail to support it, a 10:54:46</b></p> <p>19 <b>restaurant in the back and then the space that 10:54:52</b></p> <p>20 <b>remained open to the public that's managed by the 10:54:54</b></p> <p>21 <b>Park Service, which is the iconic clock tower, the 10:54:59</b></p> <p>22 <b>highest point in -- in Washington, D.C., besides the 10:55:02</b></p>
35	<p>1 <b>monument. So we went through that RFP process and, 10:55:07</b></p> <p>2 <b>through it, we were working with architects to -- to 10:55:13</b></p> <p>3 <b>take this structure and reconfigure it for hotel use. 10:55:16</b></p> <p>4 <b>In a lot of ways, it's much more 10:55:21</b></p> <p>5 <b>challenging to -- to do a renovation job than it is 10:55:25</b></p> <p>6 <b>ground-up construction because you have walls that 10:55:32</b></p> <p>7 <b>you have to -- that are existing, in this case, you 10:55:36</b></p> <p>8 <b>know, multi-feet of granite that -- that you 10:55:40</b></p> <p>9 <b>obviously have to preserve and -- and cannot move, 10:55:42</b></p> <p>10 <b>and you have to lay out the space that you want 10:55:45</b></p> <p>11 <b>within that context. So it was a really challenging 10:55:49</b></p> <p>12 <b>and rewarding effort and design process. 10:55:54</b></p> <p>13 <b>We worked with many, many different 10:55:57</b></p> <p>14 <b>groups, the Commission of Fine Arts and -- and 10:56:02</b></p> <p>15 <b>others, for the approvals we needed because of the 10:56:04</b></p> <p>16 <b>historic nature of -- of this building. We designed 10:56:07</b></p> <p>17 <b>it to be LEED certified at one of the highest levels 10:56:10</b></p> <p>18 <b>of any hotel in -- in the country, which was quite 10:56:16</b></p> <p>19 <b>exciting. And so it was, it was a huge design 10:56:18</b></p> <p>20 <b>challenge just to figure out how to do it. And then 10:56:22</b></p> <p>21 <b>the enormous construction challenge, as well, because 10:56:25</b></p> <p>22 <b>of our interest in maintaining the -- the integrity 10:56:28</b></p>
36	<p>1 <b>and the requirement to preserve elements of the 10:56:32</b></p> <p>2 <b>building which were historic in nature and -- and 10:56:36</b></p> <p>3 <b>protect them and, and still have a functional space. 10:56:40</b></p> <p>4 <b>So from construction, the architecture, layout, 10:56:45</b></p> <p>5 <b>interior design, you know, even -- even the -- all of 10:56:51</b></p> <p>6 <b>those elements was, it was a lot of work. It was, it 10:56:56</b></p> <p>7 <b>was a wonderful project to work on, though. 10:56:59</b></p> <p>8 <b>Q. So when you say the RFP's on this, did -- 10:57:05</b></p> <p>9 <b>early on in this, was the R -- the request you were 10:57:11</b></p> <p>10 <b>seeking, do people submit, like, ideas for what they 10:57:16</b></p> <p>11 <b>think they can do to the building? Is that what it 10:57:20</b></p> <p>12 <b>is? 10:57:22</b></p> <p>13 <b>A. Yes. It may have been an RFI which became 10:57:24</b></p> <p>14 <b>a request for information that became an RFP. It may 10:57:29</b></p> <p>15 <b>have been two stages. I don't recall, it's a while 10:57:33</b></p> <p>16 <b>ago now. Gosh, and that process was almost two 10:57:35</b></p> <p>17 <b>years. 10:57:41</b></p> <p>18 <b>But yes, you -- they give you a very 10:57:42</b></p> <p>19 <b>specific set of requirements for -- for submission 10:57:47</b></p> <p>20 <b>and you have to fulfill those requirements, and one 10:57:52</b></p> <p>21 <b>of those, obviously what they're interested in is 10:57:56</b></p> <p>22 <b>your vision and what you are going to do with -- with 10:57:59</b></p>
37	<p>1 <b>the space ultimately, and we had the best vision. 10:58:04</b></p> <p>2 <b>But it was very competitive. 10:58:13</b></p> <p>3 <b>Q. So I think I got a lost. You said "we had 10:58:15</b></p> <p>4 <b>the best vision." So you submitted an RF -- the 10:58:22</b></p> <p>5 <b>Trump Org submitted an RFP for this hotel, is that -- 10:58:26</b></p> <p>6 <b>A. Well, we responded to one that was put out 10:58:30</b></p> <p>7 <b>by the GSA. 10:58:33</b></p> <p>8 <b>Q. Okay. I understand now. 10:58:37</b></p> <p>9 <b>So GSA was looking for someone to do 10:58:40</b></p> <p>10 <b>something with this building? 10:58:42</b></p> <p>11 <b>A. Correct. 10:58:44</b></p> <p>12 <b>Q. Okay. I got lost all the way in the 10:58:45</b></p> <p>13 <b>beginning of that one, I think. 10:58:48</b></p> <p>14 <b>A. Oh, yeah. No, I'm sorry. The GSA was the 10:58:50</b></p> <p>15 <b>one who submitted the -- the RFP, seeking 10:58:53</b></p> <p>16 <b>private-sector proposals to redevelop this iconic 10:58:59</b></p> <p>17 <b>asset. 10:59:04</b></p> <p>18 <b>Q. Okay. I see. I'm caught up now. Thanks. 10:59:05</b></p> <p>19 <b>A. Sorry. 10:59:09</b></p> <p>20 <b>Q. Based on everything you've just said, 10:59:10</b></p> <p>21 <b>including the historic aspect, that you had to 10:59:20</b></p> <p>22 <b>maintain the -- the challenge of renovating versus 10:59:23</b></p>

<b>38</b>		<b>40</b>			
1	building from the ground up, how do you determine --	10:59:27	1	So at Trump Org, is that run by your	11:02:22
2	I don't know the appropriate language here, but I'm	10:59:31	2	father? Well, was it run by your father before he	11:02:27
3	going to use like cost-benefit analysis.	10:59:35	3	became president?	11:02:30
4	Like, how do you determine if he amount	10:59:38	4	<b>A. Yes. He was the chairman of the -- the</b>	11:02:31
5	of money you have to sink into making this happen	10:59:41	5	<b>larger, the company under which is the Trump</b>	11:02:37
6	will pay off and how long it will take? Do you know	10:59:45	6	<b>Organization, I guess. We can call it that.</b>	11:02:45
7	what, you know what I'm getting at?	10:59:47	7	<b>Q. Okay. And then what about, so he's the</b>	11:02:53
8	<b>A. I do. Some of it is -- is faith and</b>	10:59:50	8	<b>chairman. Who was like, is there a second in</b>	11:02:55
9	<b>passion, combined with research and, to your point,</b>	10:59:56	9	<b>command?</b>	11:02:57
10	<b>obviously it was a very complicated, complex and</b>	11:00:00	10	<b>A. Well, at this point in -- meaning when I</b>	11:02:57
11	<b>expensive project. But we believed we could create</b>	11:00:03	11	<b>say "at this point," now that I'm no longer with the</b>	11:03:07
12	<b>something truly exceptional and something that didn't</b>	11:00:07	12	<b>Trump company but at the point we're referring to the</b>	11:03:09
13	<b>exist in the marketplace that there would be a very</b>	11:00:12	13	<b>development of the Old Post Office Building, it</b>	11:03:14
14	<b>high demand for.</b>	11:00:15	14	<b>really would have been my brothers and myself and --</b>	11:03:16
15	<b>Q. So in a project like the Trump Hotel,</b>	11:00:20	15	<b>and a handful of senior executives, Eric Danziger</b>	11:03:18
16	<b>correct me if I'm wrong, you have to sink a lot of</b>	11:00:25	16	<b>being one of them.</b>	11:03:24
17	<b>money into it up front and then hopefully pay it off</b>	11:00:27	17	<b>Q. So -- and just for the record, your</b>	11:03:25
18	<b>after it opens, is that accurate?</b>	11:00:32	18	<b>brothers are?</b>	11:03:29
19	<b>A. Correct.</b>	11:00:34	19	<b>A. Donald Trump, Jr., and Eric Trump.</b>	11:03:31
20	<b>Q. And is that through investors, is that how</b>	11:00:36	20	<b>Q. And you. And are the three of you, or</b>	11:03:38
21	<b>you make projects like that work?</b>	11:00:44	21	<b>back then when we're talking about developing this</b>	11:03:44
22	<b>A. Well, I don't know how -- there's multiple</b>	11:00:46	22	<b>hotel, were the three of you kind of equals in the</b>	11:03:49
<b>39</b>		<b>41</b>			
1	<b>ways to make it work, but we did not have investors</b>	11:00:48	1	<b>company?</b>	11:03:52
2	<b>in -- in the project. It was, we held all the</b>	11:00:50	2	<b>A. Yes.</b>	11:03:52
3	<b>equity.</b>	11:00:55	3	<b>Q. And then you said a handful of other</b>	11:03:55
4	<b>Q. Can you just explain for me -- let's,</b>	11:01:18	4	<b>executives, Eric Danziger is one and he is</b>	11:03:57
5	<b>let's back up to the Trump Organization and tell me</b>	11:01:20	5	<b>responsible for managing the hotels, is that right?</b>	11:04:02
6	<b>what that is.</b>	11:01:24	6	<b>A. Correct. The operations of the hotel,</b>	11:04:07
7	<b>A. It is really more of a, of a name, I</b>	11:01:28	7	<b>managing the hotel.</b>	11:04:13
8	<b>guess, for corporate headquarters.</b>	11:01:34	8	<b>Q. How many other executives are there?</b>	11:04:15
9	<b>Q. And that's -- that's the family business</b>	11:01:38	9	<b>A. Oh. I'm sure we could get you that</b>	11:04:17
10	<b>you were talking about before?</b>	11:01:39	10	<b>information. I -- I don't know. It was, it was a</b>	11:04:21
11	<b>A. It's -- yeah. We -- you could call it</b>	11:01:43	11	<b>small, it was a nimble group, but -- but we, we can</b>	11:04:26
12	<b>shorthand, I guess that, but really it's -- just what</b>	11:01:49	12	<b>provide you with that.</b>	11:04:30
13	<b>we call headquarters. So I don't know that there's</b>	11:01:53	13	<b>Q. I'm just trying to gauge the size of the</b>	11:04:31
14	<b>any legally-defined, I don't know that there's any</b>	11:01:57	14	<b>Trump Organization. Is it a company of ten thousand</b>	11:04:35
15	<b>legal definition around those words.</b>	11:02:01	15	<b>people or 20?</b>	11:04:38
16	<b>Q. Okay. And I'll just be clear up front for</b>	11:02:04	16	<b>A. Well, it depends if you go to an asset</b>	11:04:39
17	<b>this line of questioning. I'm not trying to dig into</b>	11:02:08	17	<b>level. So you know, like the Trump Hotel is its own</b>	11:04:44
18	<b>any legalese here, I don't know the proper names for</b>	11:02:11	18	<b>entity and it's an employer of, of hundreds. And --</b>	11:04:51
19	<b>things, so I'm just trying to -- I want to understand</b>	11:02:15	19	<b>and then so, so if you add all that, a lot of people,</b>	11:04:55
20	<b>the structure of --</b>	11:02:18	20	<b>and each of those, each of those assets have their</b>	11:05:00
21	<b>A. Yes.</b>	11:02:19	21	<b>own leadership structure within them.</b>	11:05:03
22	<b>Q. -- how this works.</b>	11:02:20	22	<b>Q. So what about just at the -- at the top.</b>	11:05:06

42	<p>1 Let me ask you this, the Trump Org, is there, was 11:05:09</p> <p>2 there an office location? 11:05:14</p> <p>3 <b>A. Like I said, I used Trump Org just 11:05:16</b></p> <p>4 <b>colloquially. I don't know if there's any legal 11:05:22</b></p> <p>5 <b>terminology around it. But we were located in New 11:05:25</b></p> <p>6 <b>York City, is where the corporate office was. 11:05:30</b></p> <p>7 <b>Q. Okay. Maybe we can use that term, 11:05:32</b></p> <p>8 "corporate office." Who -- how many people worked 11:05:35</p> <p>9 directly for the corporate office? 11:05:38</p> <p>10 <b>A. I don't know the answer. 11:05:42</b></p> <p>11 <b>Q. Okay. Do you know approximately how many 11:05:46</b></p> <p>12 people worked in the New York City corporate office? 11:05:50</p> <p>13 <b>A. I -- I don't know the answer. I would be, 11:05:53</b></p> <p>14 <b>I would be guessing. 11:05:58</b></p> <p>15 <b>Q. Well, and again, I'm not trying to hold 11:06:01</b></p> <p>16 you to anything, I'm just trying to get a sense of 11:06:05</p> <p>17 size so that I can understand the -- the structure 11:06:07</p> <p>18 going down. 11:06:11</p> <p>19 Eric Danziger -- 11:06:12</p> <p>20 <b>A. We had adequate people to do, to meet the 11:06:14</b></p> <p>21 <b>needs of the company. 11:06:19</b></p> <p>22 <b>Q. Okay. Sure. 11:06:20</b></p>
43	<p>1 So let's, let's go to Eric Danziger. 11:06:21</p> <p>2 He -- does he work for Trump Org? 11:06:34</p> <p>3 <b>A. I don't know -- I don't know what entity 11:06:37</b></p> <p>4 <b>employs him. 11:06:42</b></p> <p>5 <b>Q. Okay. If something goes wrong, if we look 11:06:43</b></p> <p>6 at it like a chain of command -- I'm former military, 11:06:49</p> <p>7 everything goes chain of command, that's the only way 11:06:54</p> <p>8 I know how to describe it. 11:06:55</p> <p>9 But if you look at, like, a chain of 11:06:57</p> <p>10 command and something goes wrong with Eric Danziger's 11:06:59</p> <p>11 people, who does he report to when he's going up his 11:07:03</p> <p>12 chain of command? 11:07:06</p> <p>13 <b>MS. WOODS: Hey, Jen, I think it's 11:07:09</b></p> <p>14 important, since Ivanka has not been involved in the 11:07:11</p> <p>15 company for the last three and half years that are we 11:07:13</p> <p>16 clear that we're talking about the 2016 -- 11:07:16</p> <p>17 <b>MS. JONES: Yes. 11:07:19</b></p> <p>18 <b>MS. WOODS: -- early 2017 time frame? 11:07:20</b></p> <p>19 <b>MS. JONES: That's totally fair. I'm 11:07:22</b></p> <p>20 talking about when, when you were in the company and 11:07:24</p> <p>21 developing this hotel. 11:07:25</p> <p>22 <b>THE WITNESS: Yeah. Well, he was part of 11:07:27</b></p>
44	<p>1 the executive team. So if something was -- was 11:07:29</p> <p>2 happening that involved, that was part of hotel 11:07:34</p> <p>3 operations on a -- on a property level, he would, he 11:07:39</p> <p>4 would bring it to us and we'd talk about it. He 11:07:43</p> <p>5 would most very frequently resolve it himself. If it 11:07:46</p> <p>6 was a larger issue that required a group discussion 11:07:49</p> <p>7 or a deliberation, we would, we would have that as 11:07:54</p> <p>8 a -- as a collective. 11:07:57</p> <p>9 <b>BY MS. JONES: 11:07:59</b></p> <p>10 <b>Q. And when you say "bring it to us" and 11:07:59</b></p> <p>11 as -- who's "us"? 11:08:02</p> <p>12 <b>A. Well, it depends. Maybe all three of my 11:08:04</b></p> <p>13 <b>brothers or my two brothers and me. Sometimes my -- 11:08:07</b></p> <p>14 <b>my father, sometimes all of us, sometimes one of us. 11:08:12</b></p> <p>15 <b>It really depends on the particular circumstance. 11:08:14</b></p> <p>16 <b>Q. Okay. Understood. 11:08:18</b></p> <p>17 <b>A. Would it be okay if I took one minute just 11:08:25</b></p> <p>18 <b>to fill up my cup of coffee? 11:08:27</b></p> <p>19 <b>MS. JONES: You know what, we've been 11:08:30</b></p> <p>20 going for about an hour. Why don't we just take a 11:08:32</p> <p>21 quick, a quick break. 11:08:34</p> <p>22 <b>THE WITNESS: That would be great. 11:08:35</b></p>
45	<p>1 <b>MS. JONES: Do you want to do ten minutes? 11:08:37</b></p> <p>2 <b>THE WITNESS: I haven't had enough 11:08:38</b></p> <p>3 caffeine this morning, so I would appreciate that 11:08:40</p> <p>4 very much. Thank you. 11:08:42</p> <p>5 <b>MS. JONES: Let's go off the record. 11:08:43</b></p> <p>6 <b>THE VIDEOGRAPHER: Going off the record at 11:08:45</b></p> <p>7 <b>11:08 a.m. 11:08:47</b></p> <p>8 <b>(Thereupon, a break was taken at 11:08 11:08:50</b></p> <p>9 <b>a.m. until 11:26 a.m., after which the following 11:08:56</b></p> <p>10 <b>proceedings were had.) 11:08:58</b></p> <p>11 <b>THE VIDEOGRAPHER: Back on the record at 11:27:07</b></p> <p>12 <b>11:26 a.m. 11:27:11</b></p> <p>13 <b>BY MS. JONES: 11:27:14</b></p> <p>14 <b>Q. Okay. Ms. Trump, we were talking about 11:27:16</b></p> <p>15 the Trump Organization and, as your attorney pointed 11:27:33</p> <p>16 out, you're no longer with the Trump Organization. 11:27:36</p> <p>17 <b>When did you step out of that position? 11:27:38</b></p> <p>18 <b>A. In January of 2017. 11:27:42</b></p> <p>19 <b>Q. And your father also stepped out, too, is 11:27:48</b></p> <p>20 that right? 11:27:50</p> <p>21 <b>A. Correct. 11:27:51</b></p> <p>22 <b>Q. At the same time? 11:27:53</b></p>



46	<p>1 <b>A. I don't know what his timing was, but --</b> 11:27:56</p> <p>2 <b>if it was before -- it wouldn't have been after, no.</b> 11:27:59</p> <p>3 <b>It would have been around the same time.</b> 11:28:02</p> <p>4 <b>Q. Okay. And at the same time as the</b> 11:28:03</p> <p>5 <b>inauguration?</b> 11:28:05</p> <p>6 <b>A. Before the inauguration.</b> 11:28:07</p> <p>7 <b>Q. And what about your brothers, Eric and</b> 11:28:09</p> <p>8 <b>Donald, Eric Trump and Donald Trump, Jr., are they</b> 11:28:13</p> <p>9 <b>both still in the organization?</b> 11:28:16</p> <p>10 <b>A. They are.</b> 11:28:18</p> <p>11 <b>Q. Are they, are they currently running it?</b> 11:28:19</p> <p>12 <b>A. I don't know how to answer. I don't talk</b> 11:28:24</p> <p>13 <b>with them about the business or the structure of the</b> 11:28:30</p> <p>14 <b>company, but -- but they're, they're still there in</b> 11:28:31</p> <p>15 <b>their same positions.</b> 11:28:35</p> <p>16 <b>Q. Well, do you know who the chairman is now?</b> 11:28:36</p> <p>17 <b>A. I do not, actually.</b> 11:28:38</p> <p>18 <b>Q. Okay. And so your understanding is</b> 11:28:45</p> <p>19 <b>they're still -- what were their positions before,</b> 11:28:49</p> <p>20 <b>vice -- or executive vice president?</b> 11:28:52</p> <p>21 <b>A. The same as myself, yes.</b> 11:28:54</p> <p>22 <b>Q. So let's go back again to when you were in</b> 11:28:56</p>	48	<p>1 <b>A. That's -- I'm not involved in -- in that</b> 11:30:08</p> <p>2 <b>for any of the hotels, or I was not involved in any</b> 11:30:13</p> <p>3 <b>of that for any of the hotels and definitely not now.</b> 11:30:16</p> <p>4 <b>Q. Okay. Can you explain to me, when --</b> 11:30:23</p> <p>5 <b>again, back when you were in the Trump Organization</b> 11:30:26</p> <p>6 <b>in 2016 and before, how -- how do you individually</b> 11:30:29</p> <p>7 <b>make money from the operations of the hotels?</b> 11:30:36</p> <p>8 <b>A. Well, you have the revenue generated by</b> 11:30:42</p> <p>9 <b>the hotel as -- as a collective. In some cases</b> 11:30:50</p> <p>10 <b>there's a condominium component, in other cases there</b> 11:30:55</p> <p>11 <b>is not, so similar to how all hotels make money.</b> 11:30:59</p> <p>12 <b>Q. Let me ask you this first. What do you</b> 11:31:09</p> <p>13 <b>mean by a condominium component?</b> 11:31:11</p> <p>14 <b>A. Well, sometimes you have a mixed-use</b> 11:31:15</p> <p>15 <b>building, where there are rooms or there are --</b> 11:31:17</p> <p>16 <b>there's residential real estate that's being resold,</b> 11:31:22</p> <p>17 <b>there's -- there's also commercial space that's being</b> 11:31:27</p> <p>18 <b>rented that's part of a building of the hotel in it.</b> 11:31:29</p> <p>19 <b>So -- so there are different income streams.</b> 11:31:34</p> <p>20 <b>Q. I see. So are some of the Trump Hotels</b> 11:31:37</p> <p>21 <b>both condo and hotel space?</b> 11:31:40</p> <p>22 <b>A. Yes.</b> 11:31:42</p>
47	<p>1 the organization, so prior to January of 2017. 11:29:08</p> <p>2 Were you -- were you ever involved in 11:29:13</p> <p>3 hotel pricing? 11:29:18</p> <p>4 <b>A. No. In -- in terms of when you say, in</b> 11:29:20</p> <p>5 <b>terms of like the acquisition of a hotel, or what do</b> 11:29:25</p> <p>6 <b>you mean by hotel pricing?</b> 11:29:28</p> <p>7 <b>Q. No, that's fair.</b> 11:29:30</p> <p>8 <b>A. I was involved in acquisition.</b> 11:29:32</p> <p>9 <b>Q. Sure. So you were involved in pricing</b> 11:29:34</p> <p>10 <b>when you were getting the hotel and developing the</b> 11:29:36</p> <p>11 <b>hotel, right?</b> 11:29:39</p> <p>12 <b>A. Correct -- well, price, you know, building</b> 11:29:40</p> <p>13 <b>costs and -- and whatnot, yes.</b> 11:29:44</p> <p>14 <b>Q. So yeah, that's a fair point. So what I'm</b> 11:29:47</p> <p>15 <b>asking is more the operations of the actual hotel.</b> 11:29:51</p> <p>16 <b>Are you ever involved in setting, let's</b> 11:29:53</p> <p>17 <b>say, guest room prices?</b> 11:29:56</p> <p>18 <b>A. No.</b> 11:29:58</p> <p>19 <b>Q. Are you ever involved in setting</b> 11:29:58</p> <p>20 <b>event-space prices?</b> 11:30:02</p> <p>21 <b>A. No.</b> 11:30:03</p> <p>22 <b>Q. And is that for any of the hotels?</b> 11:30:03</p>	49	<p>1 <b>Q. What about the -- the D.C. Trump Hotel?</b> 11:31:43</p> <p>2 <b>A. No. It's -- it's, it's just hotel space</b> 11:31:48</p> <p>3 <b>and then there's a commercial component for, with</b> 11:31:52</p> <p>4 <b>restaurants, et cetera.</b> 11:31:57</p> <p>5 <b>Q. Okay. So the revenue that is generated at</b> 11:31:58</p> <p>6 <b>the hotel, how is it -- I guess the question is, and,</b> 11:32:07</p> <p>7 <b>again, I'm not sure the right words to use to ask it,</b> 11:32:10</p> <p>8 <b>but how do you, Ivanka Trump, get that money? How is</b> 11:32:12</p> <p>9 <b>it divided among you and your brothers, let's say,</b> 11:32:16</p> <p>10 <b>the revenue?</b> 11:32:19</p> <p>11 <b>A. Well, it depends if there is, if there are</b> 11:32:21</p> <p>12 <b>profits over and above, over and above all the other</b> 11:32:29</p> <p>13 <b>expenses associated with, with the hotel. So that</b> 11:32:36</p> <p>14 <b>would be the first hurdle, if you will. And then it</b> 11:32:40</p> <p>15 <b>happens through a distribution.</b> 11:32:45</p> <p>16 <b>Q. And what does that distribution consist</b> 11:32:50</p> <p>17 <b>of? I mean, is it, like, split evenly or is it --</b> 11:32:56</p> <p>18 <b>what's it based on?</b> 11:32:59</p> <p>19 <b>A. It is, it depends on, it depends on which</b> 11:33:01</p> <p>20 <b>property we're talking about, so it's really</b> 11:33:07</p> <p>21 <b>deal-specific.</b> 11:33:10</p> <p>22 <b>Q. So let's focus on just the D.C. Trump</b> 11:33:10</p>

50	<p>1 Hotel. Let's just focus on that property. 11:33:16</p> <p>2 How are the profits from that property 11:33:18</p> <p>3 distributed among you and -- and your family members? 11:33:21</p> <p>4 <b>A. Well, I have an interest in -- in the 11:33:25</b></p> <p>5 <b>property, as do some of my family members. 11:33:33</b></p> <p>6 Q. And what do you mean by you have an 11:33:36</p> <p>7 interest in the property? 11:33:39</p> <p>8 <b>A. I have an equity interest in the property, 11:33:41</b></p> <p>9 <b>and I have an ownership interest in the property. 11:33:43</b></p> <p>10 Q. And so do you, do you have like an equal 11:33:48</p> <p>11 ownership interest or more or less than your 11:33:56</p> <p>12 brothers? 11:33:58</p> <p>13 MS. WOODS: Jen, what, how is that 11:34:00</p> <p>14 relevant to what we're talking about? 11:34:02</p> <p>15 MS. JONES: I mean the -- the -- I'm 11:34:04</p> <p>16 trying to decide if I want to answer, that's not an 11:34:11</p> <p>17 actual objection. 11:34:17</p> <p>18 But it goes directly to this case, right. 11:34:17</p> <p>19 It's a private inurement case and profits from the 11:34:19</p> <p>20 hotel obviously matter here, so I'm just trying to 11:34:22</p> <p>21 understand how the profits are split up between your 11:34:25</p> <p>22 family members. 11:34:27</p>	52	<p>1 BY MS. JONES: 11:38:37</p> <p>2 Q. All right. So we were talking about 11:38:38</p> <p>3 the -- how, how profits from the D.C. Trump Hotel are 11:38:40</p> <p>4 distributed to your family members, and I believe I 11:38:44</p> <p>5 was asking, if I remember correctly, if, if -- you 11:38:49</p> <p>6 said you had an ownership interest and I'm asking if 11:38:54</p> <p>7 there's like an equal split between your brothers or 11:38:56</p> <p>8 if it's split up a different way. 11:38:59</p> <p>9 <b>A. I -- I would prefer to only speak for 11:39:05</b></p> <p>10 <b>myself because -- because that's what I know for 11:39:06</b></p> <p>11 <b>certain and I have, I have extensive public 11:39:11</b></p> <p>12 <b>disclosures on this topic that you can review. 11:39:15</b></p> <p>13 Q. Okay. So for yourself, you, you get a 11:39:19</p> <p>14 share of the profits. Let me ask you this, do -- I 11:39:23</p> <p>15 mean, you have an ownership interest in the hotel, 11:39:25</p> <p>16 correct? 11:39:28</p> <p>17 <b>A. Yes. 11:39:29</b></p> <p>18 Q. All right. And do you know who are the 11:39:29</p> <p>19 other people that have ownership interest in the 11:39:32</p> <p>20 hotel? 11:39:34</p> <p>21 <b>A. I know some of them, I think all of them, 11:39:37</b></p> <p>22 <b>but -- 11:39:41</b></p>
51	<p>1 MS. WOODS: Yeah. I mean, I just 11:34:29</p> <p>2 thought -- this isn't the Ivanka versus her brothers 11:34:31</p> <p>3 case, this is, to the extent that you guys have 11:34:34</p> <p>4 hypothesized that somehow the hotel is overcharging 11:34:37</p> <p>5 and it bleeds up to the Trumps, can we keep it on the 11:34:42</p> <p>6 Trump level and I'll continue letting you asking some 11:34:46</p> <p>7 questions? Otherwise, you know, we're going to have 11:34:49</p> <p>8 to have a deeper discussion. But the parts about 11:34:52</p> <p>9 between the Trumps, what is the point of that? 11:34:56</p> <p>10 MS. JONES: Okay. Let's go off the 11:34:57</p> <p>11 record, if we want to have a lengthy conversation. 11:34:59</p> <p>12 But that's not an actual objection, it's not based on 11:35:02</p> <p>13 privilege and its relevancy isn't even an objection, 11:35:04</p> <p>14 but his is relevant. If you want to have a lengthy 11:35:07</p> <p>15 discussion, we can go off the record, but -- 11:35:09</p> <p>16 MS. WOODS: All right. Then let's go off 11:35:11</p> <p>17 the record. 11:35:13</p> <p>18 THE VIDEOGRAPHER: Going off the record at 11:35:14</p> <p>19 11:34 a.m. 11:35:15</p> <p>20 (Discussion off the record.) 11:35:21</p> <p>21 THE VIDEOGRAPHER: Back on the record at 11:38:27</p> <p>22 11:38 a.m. 11:38:34</p>	53	<p>1 Q. Can you tell me whose people are? 11:39:41</p> <p>2 <b>A. Don Trump, Eric Trump and Donald Trump. 11:39:45</b></p> <p>3 Q. And is Don Trump, Donald Trump, Jr.? 11:39:50</p> <p>4 <b>A. Correct. 11:39:54</b></p> <p>5 Q. And so you're not certain what their 11:39:55</p> <p>6 ownership interest is, is that what you're saying, 11:40:04</p> <p>7 like what percentage? 11:40:06</p> <p>8 <b>A. I -- I've been out of the company for four 11:40:08</b></p> <p>9 <b>years, so no. 11:40:11</b></p> <p>10 Q. Do you know in 2016, in 2016, were each of 11:40:13</p> <p>11 your family members getting a share of the profits 11:40:22</p> <p>12 from the hotel? 11:40:26</p> <p>13 <b>A. Well, we hadn't opened then, so there were 11:40:29</b></p> <p>14 <b>no profits. 11:40:34</b></p> <p>15 Q. You opened in October 2016, is that right? 11:40:35</p> <p>16 <b>A. Yeah, October -- I believe it was October 11:40:39</b></p> <p>17 <b>2016. 11:40:44</b></p> <p>18 Q. And so even because you have an ownership 11:40:44</p> <p>19 interest, you know, aside from being a part of the 11:40:50</p> <p>20 Trump Organization, you still receive profits from 11:40:53</p> <p>21 the hotel to this day, right? 11:40:56</p> <p>22 <b>A. Well, I have, I've maintained my ownership 11:40:59</b></p>

<b>54</b>	<b>56</b>
<p>1 interest in, in the asset. 11:41:05</p> <p>2 Q. And so you receive -- and, again, I 11:41:07</p> <p>3 understand you have public disclosures, I've seen 11:41:10</p> <p>4 them. I mean, you -- 11:41:12</p> <p>5 A. Yes. All of everything done in 11:41:13</p> <p>6 consultation with the Office of Government Ethics and 11:41:15</p> <p>7 at their guidance, so it's all publicly available. 11:41:17</p> <p>8 Q. Right. And so you receive profits from 11:41:20</p> <p>9 the hotel currently, correct? 11:41:24</p> <p>10 MS. WOODS: Objec ion, foundation. 11:41:28</p> <p>11 MS. JONES: You can answer. 11:41:31</p> <p>12 MS. WOODS: You can answer. Unless I say 11:41:33</p> <p>13 don't answer, you can answer -- 11:41:35</p> <p>14 THE WITNESS: Okay. 11:41:37</p> <p>15 MS. WOODS: It's for the record. 11:41:38</p> <p>16 THE WITNESS: I've maintained my -- I've 11:41:38</p> <p>17 maintained my interest in he asset, but in, in he 11:41:40</p> <p>18 equity of the asset. 11:41:45</p> <p>19 BY MS. JONES: 11:41:47</p> <p>20 Q. So I don't know if I'm asking he question 11:41:49</p> <p>21 wrong, maybe I am. But I'm asking if you, if you get 11:41:51</p> <p>22 some of the profits from hat hotel? 11:41:55</p>	<p>1 or not? Is that, like, on an annual basis or a -- 11:43:06</p> <p>2 A. Oh, gosh. It would -- it would depend 11:43:09</p> <p>3 however the Trump Organization does that accounting 11:43:13</p> <p>4 because I'm not involved in -- in those decisions 11:43:17</p> <p>5 about reporting and accounting and distribution, any 11:43:22</p> <p>6 of that. For the last four years, I've been out of 11:43:23</p> <p>7 the business. 11:43:33</p> <p>8 Q. You've been out of the business for the 11:43:35</p> <p>9 last four years, but if I'm understanding your public 11:43:38</p> <p>10 disclosures correctly, you still get some money from 11:43:43</p> <p>11 the hotel, right? 11:43:45</p> <p>12 MS. WOODS: Objection, foundation. 11:43:46</p> <p>13 THE WITNESS: No. I think it's -- the 11:43:47</p> <p>14 public disclosure, if you read what it is, it's a 11:43:56</p> <p>15 complicated document and they value things 11:43:58</p> <p>16 differently sometimes. It's the asset value as they 11:44:00</p> <p>17 think it is, so there are different ways to determine 11:44:04</p> <p>18 what, what you have to fill out. You can look at the 11:44:08</p> <p>19 form and see what it is for -- for the Old Post 11:44:12</p> <p>20 Office. 11:44:17</p> <p>21 Q. Is there like a payout schedule that 11:44:29</p> <p>22 you're aware of? 11:44:31</p>
<b>55</b>	<b>57</b>
<p>1 A. If there are profits. But sometimes, 11:42:00</p> <p>2 especially in the early years of a hotel, it's -- 11:42:02</p> <p>3 it's reinvested back into the asset and not 11:42:06</p> <p>4 distributed out. So -- so I -- that's the case here. 11:42:09</p> <p>5 Q. I see. Okay. 11:42:21</p> <p>6 A. As I say, I maintain my ownership interest 11:42:22</p> <p>7 in the asset. 11:42:26</p> <p>8 Q. So am I correct in understanding then that 11:42:26</p> <p>9 sometimes -- let me ask you this. Do -- whe her or 11:42:27</p> <p>10 not a profit is made, is that determined, like, on a 11:42:29</p> <p>11 yearly basis? 11:42:31</p> <p>12 A. Whether or not -- I mean, it depends if 11:42:33</p> <p>13 you're doing it from an accounting perspective. Or 11:42:38</p> <p>14 from an operations perspective, I would imagine it's 11:42:41</p> <p>15 done on a daily basis by the team managing the asset. 11:42:47</p> <p>16 But -- but yeah, from an accounting perspective, you 11:42:51</p> <p>17 would do it quarterly, annually. 11:42:53</p> <p>18 Q. Okay. I'm just trying to understand 11:42:55</p> <p>19 because you just said that -- when I was asking if 11:42:56</p> <p>20 you make some of the profit, you said if a profit is 11:42:59</p> <p>21 made. So I'm just trying to understand when would 11:43:01</p> <p>22 you know if you were gonna make money from the hotel 11:43:04</p>	<p>1 A. No. 11:44:32</p> <p>2 Q. No. 11:44:32</p> <p>3 A. Uh-uh. 11:44:35</p> <p>4 Q. So that when we talked about you acquiring 11:44:36</p> <p>5 and sinking some money into this hotel, you said that 11:44:47</p> <p>6 you all did not have investors, is hat right? 11:44:50</p> <p>7 A. Correct. 11:44:54</p> <p>8 Q. And so is -- does that mean that the Trump 11:44:54</p> <p>9 Organization funded it, you all funded it yourself 11:44:59</p> <p>10 from that? 11:45:02</p> <p>11 A. Well, when I talked about investors, I 11:45:03</p> <p>12 mean co-owners in the property. We had what is 11:45:05</p> <p>13 traditional in, in a construction project, a 11:45:09</p> <p>14 construction loan, but we -- there's no, the lender 11:45:15</p> <p>15 doesn't have a partnership interest. And -- and we 11:45:20</p> <p>16 didn't have partners in, in the equity component. 11:45:24</p> <p>17 Q. And so with the -- how does the 11:45:29</p> <p>18 construction loan -- well, I won't ask hat broadly. 11:45:32</p> <p>19 I'll just ask specifically here like this 11:45:37</p> <p>20 construction loan, does all the -- how does it work 11:45:38</p> <p>21 in a business like this? Does all of he income, the 11:45:44</p> <p>22 revenue, go to the construc ion loan first before any 11:45:47</p>

58	<p>1 profits are realized? Is that how it works or -- 11:45:50</p> <p>2 MS. WOODS: Well, objection, foundation. 11:45:54</p> <p>3 Go ahead. 11:45:56</p> <p>4 THE WITNESS: It really, it really depends 11:45:57</p> <p>5 on -- on the asset and -- and the individual loan 11:45:59</p> <p>6 document. 11:46:04</p> <p>7 BY MS. JONES: 11:46:06</p> <p>8 Q. So with the -- with the Trump Hotel in 11:46:06</p> <p>9 D.C. that you have an ownership interest in, do -- 11:46:09</p> <p>10 does all the revenue go into paying off the 11:46:14</p> <p>11 construction loan before you see any of the profits? 11:46:17</p> <p>12 MS. WOODS: Objection. 11:46:22</p> <p>13 THE WITNESS: I -- you would have to, you 11:46:23</p> <p>14 would have to look at the loan document. 11:46:27</p> <p>15 BY MS. JONES: 11:46:31</p> <p>16 Q. I see. So you don't know? 11:46:32</p> <p>17 A. No, not specifically how the waterfall 11:46:34</p> <p>18 works. I'm sorry. 11:46:37</p> <p>19 Q. Yeah, no. I'm just going to ask in like 11:46:41</p> <p>20 the most basic terms. 11:46:44</p> <p>21 Have you gotten any money from the Trump 11:46:45</p> <p>22 Hotel? Have you earned any money from that business? 11:46:48</p>	60	<p>1 again, I use the word "chain of command," where is he 11:48:11</p> <p>2 in the -- in the organizational structure? 11:48:14</p> <p>3 A. I don't know exactly, aside from the fact 11:48:19</p> <p>4 that he's general manager of this asset. I don't 11:48:22</p> <p>5 know what his title is. 11:48:25</p> <p>6 Q. Do you know if -- if something goes wrong 11:48:27</p> <p>7 and Mr. Damelincourt needs to report up to someone, 11:48:31</p> <p>8 who, who would he go to, do you know? 11:48:34</p> <p>9 A. He would have gone to Eric Danziger, who 11:48:37</p> <p>10 oversaw operations. 11:48:43</p> <p>11 Q. Did he ever go, come directly to you? 11:48:45</p> <p>12 A. Well, I knew him and he knew me, so I'm -- 11:48:50</p> <p>13 you know, if there was, if there was something I 11:48:53</p> <p>14 could be helpful with or whatever, we, we certainly 11:48:56</p> <p>15 knew one another. But no, from an operations 11:49:00</p> <p>16 perspective, he -- he dealt with, he dealt with Eric. 11:49:02</p> <p>17 Eric Danziger, to be clear. 11:49:11</p> <p>18 Q. Okay, yeah. Thank you. Because there are 11:49:12</p> <p>19 two Eric's, so that's -- I should clarify that, too. 11:49:16</p> <p>20 So I don't want to put words in your 11:49:22</p> <p>21 mouth, I'm trying to parse out your -- your last 11:49:26</p> <p>22 answer. So did he come to you for help on, on issues 11:49:28</p>
59	<p>1 A. I don't know. I don't -- I don't believe 11:46:51</p> <p>2 that -- yeah, I don't know. Anything I would have 11:46:55</p> <p>3 earned would have been disclosed, though. 11:47:01</p> <p>4 Q. Who hired Mr. Damelincourt? 11:47:16</p> <p>5 MS. WOODS: When? 11:47:25</p> <p>6 MS. JONES: When he was hired at the Trump 11:47:25</p> <p>7 Hotel. 11:47:29</p> <p>8 MS. WOODS: Well, Jen, you deposed him. 11:47:29</p> <p>9 Which one? This one, the D.C. one? 11:47:32</p> <p>10 MS. JONES: Oh, forgive me. 11:47:35</p> <p>11 BY MS. JONES: 11:47:35</p> <p>12 Q. The first time, who hired 11:47:37</p> <p>13 Mr. Damelincourt, the first time in the Trump 11:47:40</p> <p>14 business? 11:47:43</p> <p>15 A. Trump Chicago, I believe. 11:47:47</p> <p>16 Yeah. He was one of our, our first 11:47:49</p> <p>17 general managers. So, you know, a bunch of us 11:47:51</p> <p>18 interviewed him. I -- I was one of those people who 11:47:55</p> <p>19 interviewed him. I believe Don interviewed him, as 11:47:58</p> <p>20 well. I can't recall about Eric. Jim Petrus, I 11:48:01</p> <p>21 believe, was at the company then. 11:48:04</p> <p>22 Q. And where does Mr. Damelincourt fall in -- 11:48:06</p>	61	<p>1 sometimes? 11:49:31</p> <p>2 A. Well, it depends what the issue was. If 11:49:35</p> <p>3 it related to the development or maybe the -- an 11:49:38</p> <p>4 interior design question -- he was involved in 11:49:43</p> <p>5 pre-construction, he may come to me. But if it 11:49:46</p> <p>6 related to just pure operations or, you know, his 11:49:49</p> <p>7 primary job, he would go to Eric Danziger. 11:49:54</p> <p>8 Q. Okay. So did Mr. Damelincourt ever come 11:49:57</p> <p>9 to you -- let's say hypothetically he had an issue 11:50:00</p> <p>10 with a hotel guest that said they knew you and they 11:50:05</p> <p>11 wanted special treatment. Would he come to you for 11:50:08</p> <p>12 that or would he go to Mr. Danziger? 11:50:13</p> <p>13 A. I would prefer not to answer hypothetical 11:50:15</p> <p>14 questions. 11:50:17</p> <p>15 Q. Okay. I was trying to keep it out of, out 11:50:21</p> <p>16 of -- could you, then, give me an actual example of a 11:50:24</p> <p>17 time when Mr. Damelincourt came to you about a 11:50:28</p> <p>18 problem within the hotel? 11:50:31</p> <p>19 A. I -- I wouldn't be able to recall a 11:50:33</p> <p>20 specific example like that. 11:50:36</p> <p>21 Q. Okay. Does Mr. Dan -- excuse me, does 11:50:38</p> <p>22 Mr. Damelincourt ever contact you about issues with 11:50:46</p>

62		64	
1	guests? 11:50:48	1	<b>A. I don't -- don't recall. I don't recall</b> 11:53:20
2	<b>A. Not that I recall.</b> 11:50:49	2	<b>that.</b> 11:53:29
3	<b>Q. Does he ever contact you about issues with</b> 11:50:53	3	<b>Q. Do you ever get your friends discounts at</b> 11:53:29
4	<b>pricing?</b> 11:50:55	4	<b>the hotel?</b> 11:53:31
5	<b>A. Not that I recall.</b> 11:50:58	5	<b>A. Not that I can -- not that I can remember.</b> 11:53:33
6	<b>Q. Has he ever contacted you about issues</b> 11:50:59	6	<b>Q. Do you ever ask Mr. Damelincourt to comp a</b> 11:53:35
7	<b>with hotel space, like event space?</b> 11:51:06	7	<b>friend's room?</b> 11:53:39
8	<b>MS. WOODS: That's pretty broad, Jen.</b> 11:51:12	8	<b>A. A lot of this isn't relevant because the</b> 11:53:40
9	<b>THE WITNESS: Can you clarify that?</b> 11:51:16	9	<b>hotel wasn't -- the hotel wasn't open until, like you</b> 11:53:44
10	<b>BY MS. JONES:</b> 11:51:17	10	<b>mentioned, October and I left the organization really</b> 11:53:50
11	<b>Q. Yeah. Has he ever contacted you because</b> 11:51:18	11	<b>shortly thereafter. So it's, you know, unlike in --</b> 11:53:55
12	<b>of an issue with a hotel event space?</b> 11:51:20	12	<b>it was, it was just different. There wasn't a lot of</b> 11:53:59
13	<b>A. A construction issue?</b> 11:51:23	13	<b>time from when the hotel opened to when I was there.</b> 11:54:02
14	<b>Q. No, no, once the hotel is open.</b> 11:51:25	14	<b>So it would have been this finite window.</b> 11:54:05
15	<b>A. Oh. Not that I recall.</b> 11:51:29	15	<b>Q. Okay. So let me ask this. Between when</b> 11:54:08
16	<b>Q. Okay. Do you ever recall Mr. Dam -- do</b> 11:51:31	16	<b>the hotel opened in October of 2016 to when you left</b> 11:54:10
17	<b>you ever talk to Mr. Damelincourt directly about</b> 11:51:40	17	<b>in January of 2017, did you ever tell</b> 11:54:14
18	<b>issues with pricing?</b> 11:51:42	18	<b>Mr. Damelincourt to comp a hotel room for any of your</b> 11:54:17
19	<b>A. No. Not -- I mean not that I remember,</b> 11:51:45	19	<b>friends?</b> 11:54:22
20	<b>anyhow.</b> 11:51:49	20	<b>A. I -- I don't remember doing that, no.</b> 11:54:23
21	<b>Q. Do people ever come to you and say that</b> 11:51:50	21	<b>Q. And so when are you saying that since you</b> 11:54:25
22	<b>they would like to get, let's say, a better price on</b> 11:51:58	22	<b>left the Trump Organization, do you have zero contact</b> 11:54:29
63		65	
1	a room and ask you for help with that? 11:52:02	1	with the Trump Hotel now? 11:54:32
2	<b>A. Oh. Well, you know, in this business,</b> 11:52:04	2	<b>A. No. I'm here for a meal occasionally</b> 11:54:35
3	<b>people always e-mail you and say a friend is coming</b> 11:52:08	3	<b>or -- typically just a meal. So I've been here for a</b> 11:54:41
4	<b>into town, do you have space at the hotel? Or once</b> 11:52:11	4	<b>couple of events, but -- but I've had no involvement</b> 11:54:48
5	<b>in a while, you know, they'll e-mail you about can</b> 11:52:16	5	<b>in the operation of the hotel.</b> 11:54:52
6	<b>you help us with that. But I'm not in the business</b> 11:52:20	6	<b>Q. Okay. So since January 2017, when you</b> 11:54:55
7	<b>of reservations, so I will typically pass them along</b> 11:52:23	7	<b>left the Trump Organization -- Organization, do you</b> 11:55:01
8	<b>to the relevant person.</b> 11:52:26	8	<b>still send -- do friends still contact you and ask</b> 11:55:05
9	<b>Q. Okay. And is that relevant person ever</b> 11:52:28	9	<b>for help getting a room at the Trump Hotel?</b> 11:55:10
10	<b>Mr. Damelincourt?</b> 11:52:30	10	<b>A. I -- I don't recall an example of that,</b> 11:55:13
11	<b>A. Depends on the property. So if there --</b> 11:52:31	11	<b>no.</b> 11:55:16
12	<b>if a friend of mine four years ago was -- was coming</b> 11:52:36	12	<b>Q. Okay. And so since you left in January</b> 11:55:17
13	<b>to D.C. and asked me to help them book a room, I</b> 11:52:39	13	<b>2017, have you assisted any of your friends getting,</b> 11:55:26
14	<b>would pass them to Mickael so he could handle it.</b> 11:52:42	14	<b>in getting a room at the Trump Hotel?</b> 11:55:26
15	<b>Q. Okay. And that's Mickael Damelincourt?</b> 11:52:46	15	<b>A. As I said before, I -- I don't recall</b> 11:55:29
16	<b>A. Correct.</b> 11:52:50	16	<b>having done that, no.</b> 11:55:32
17	<b>Q. Okay. When you have friends, like the</b> 11:52:50	17	<b>Q. Okay. What about Ms. Tang, do you have</b> 11:55:33
18	<b>example you just gave when you have friends who ask</b> 11:52:59	18	<b>any interactions with Ms. Tang at the D.C. Trump</b> 11:55:46
19	<b>for help booking a room in the D.C. Trump Hotel and</b> 11:53:05	19	<b>Hotel?</b> 11:55:49
20	<b>you send them to Mr. Damelincourt, do you ever talk</b> 11:53:09	20	<b>A. I don't know who -- I don't know who that</b> 11:55:49
21	<b>to Mr. Damelincourt about the price that he should</b> 11:53:14	21	<b>is.</b> 11:55:52
22	<b>give your friend?</b> 11:53:17	22	<b>Q. Do you know who Mr. David Anderson is?</b> 11:55:52

66		68			
1	Does that name sound familiar?	11:56:00	1	<b>A. No.</b>	11:58:38
2	<b>A. It doesn't.</b>	11:56:02	2	Q. Who is Allen Weisselberg?	11:58:39
3	Q. Is there anyone else at the D.C. Trump	11:56:03	3	<b>A. He is the – I would have to see what his,</b>	11:58:51
4	Hotel that you have contact with, other than	11:56:07	4	<b>his – I don't know what his exact job title is, but</b>	11:58:56
5	Mr. Damelincourt?	11:56:09	5	<b>he's an executive at the company.</b>	11:59:00
6	<b>A. No.</b>	11:56:12	6	Q. And "at the company," just to be clear,	11:59:02
7	Q. All right. So if a situation did come up	11:56:16	7	we're talking about the -- when we spoke earlier	11:59:09
8	before, like let's use your example of having a	11:56:22	8	about the Trump Organization --	11:59:14
9	friend reach out to you, Mr. Damelincourt is the	11:56:25	9	<b>A. In our – in our corporate offices.</b>	11:59:15
10	person you would contact?	11:56:27	10	Q. Okay. Thanks.	11:59:17
11	<b>A. Yes.</b>	11:56:28	11	Let's talk very briefly about the campaign	11:59:34
12	Q. We talked a little bit about Mr. Danziger	11:56:31	12	and then I want to move into the inaugural. But did	11:59:36
13	a bit ago. Does he work in the corporate offices?	11:56:43	13	you have a role in the campaign at all?	11:59:40
14	Or back in 2016, when you were still with the Trump	11:56:46	14	<b>A. Not a – not a formal one.</b>	11:59:43
15	Organization, did he work in the corporate offices in	11:56:49	15	Q. And I should be clear, I'm talking about	11:59:46
16	New York with you?	11:56:52	16	the 2016 election.	11:59:48
17	<b>A. He worked at headquarters, yes.</b>	11:56:53	17	<b>A. Yes.</b>	11:59:48
18	Q. At headquarters. We're calling it, I	11:56:58	18	Q. And when you say "not a formal one," can	11:59:53
19	forgot, sorry.	11:57:01	19	you expand just a little bit?	11:59:56
20	And where was his office in relation to	11:57:02	20	<b>A. Well, my father was running for president</b>	11:59:58
21	yours?	11:57:05	21	<b>of the United States, so there's a natural connection</b>	12:00:01
22	<b>A. Two over.</b>	11:57:08	22	<b>to, to that process. But I did not have a formal</b>	12:00:07
67		69			
1	Q. How often would you say you interacted	11:57:11	1	<b>title or -- or role as part of the campaign, no.</b>	12:00:10
2	with Mr. Danziger when it -- in relation to hotel	11:57:18	2	Q. Did either of your brothers have a formal	12:00:13
3	operations?	11:57:22	3	role?	12:00:18
4	<b>A. I mean, we – we, as I said, he would, he</b>	11:57:24	4	<b>A. You would have to ask them.</b>	12:00:19
5	<b>was two offices over. Eric separated us office-wise,</b>	11:57:32	5	Q. You don't know?	12:00:20
6	<b>so we interacted all the time. Specific to hotel</b>	11:57:36	6	<b>A. I don't.</b>	12:00:22
7	<b>operations, really it depended, it depended on the</b>	11:57:41	7	Q. Okay. Let's talk about the inauguration	12:00:27
8	<b>season, it depended on – most of my interactions</b>	11:57:45	8	and the -- the whole process, from when your father	12:00:35
9	<b>with Eric Danziger were as we were building hotel</b>	11:57:47	9	got elected to the actual inauguration.	12:00:39
10	<b>product to get his, his guidance because he's an</b>	11:57:51	10	Did you, did you play a role in, in	12:00:44
11	<b>operator and he would have to utilize the space we</b>	11:57:54	11	planning that?	12:00:48
12	<b>were envisioning and – and developing, so he was</b>	11:57:57	12	<b>A. In planning what?</b>	12:00:52
13	<b>really helpful in that process.</b>	11:58:01	13	Q. The inauguration, the whole event.	12:00:53
14	Q. And just to be clear, you reminded me	11:58:04	14	<b>A. The inauguration.</b>	12:00:56
15	earlier, you said that the offices are separated by	11:58:07	15	Q. Yeah.	12:00:56
16	Eric. Is that Eric Trump?	11:58:10	16	<b>A. No.</b>	12:01:00
17	<b>A. Yes.</b>	11:58:11	17	Q. Of course, there have been a lot of	12:01:01
18	Q. Okay. Let me just ask, you have another	11:58:12	18	documents turned over in this, in his case, and	12:01:03
19	sibling, Tiffany. Is she in this business at all?	11:58:30	19	there are several documents that I won't bore you	12:01:06
20	<b>A. No.</b>	11:58:33	20	with, unless you want to see some of them, but with	12:01:09
21	Q. She doesn't work for the Trump	11:58:36	21	you talking about a variety of things, whether it's	12:01:12
22	Organization?	11:58:38	22	entertainers or locations or balls or, you know,	12:01:16

70	<p>1 events with -- with a variety of people. And it 12:01:19</p> <p>2 looks from those e-mails like -- I don't know if the 12:01:26</p> <p>3 right word is advice or you're giving input on 12:01:32</p> <p>4 events. Does that sound accurate? 12:01:34</p> <p>5 MS. WOODS: Objection. 12:01:38</p> <p>6 THE WITNESS: If I was, if I was asked or 12:01:39</p> <p>7 if my opinion was solicited, I sure -- could, would 12:01:42</p> <p>8 give feedback, either to my father or to anyone who 12:01:48</p> <p>9 asked my perspective and opinion. 12:01:52</p> <p>10 BY MS. JONES: 12:01:55</p> <p>11 Q. And so the questions that I have to ask 12:01:57</p> <p>12 you about this is kind of what I'm looking for is 12:02:01</p> <p>13 just your involvement in the process of planning the 12:02:07</p> <p>14 inauguration. 12:02:10</p> <p>15 A. Yeah. I really didn't have an 12:02:11</p> <p>16 involvement. I mean, I -- 12:02:13</p> <p>17 Q. Do you know who Stephanie Winston Wolkoff 12:02:20</p> <p>18 is? 12:02:24</p> <p>19 A. I do. 12:02:25</p> <p>20 Q. And did you recommend that -- well, do you 12:02:25</p> <p>21 know who Tom Barrack is? 12:02:29</p> <p>22 A. I do. 12:02:30</p>	72	<p>1 in New York and she was involved in -- in event 12:03:44</p> <p>2 planning, so I believe I passed along her name. I 12:03:47</p> <p>3 can't recall if there were, if there were other 12:03:53</p> <p>4 people I recommended or just her, but I have a vague 12:03:54</p> <p>5 recollection of that. 12:03:56</p> <p>6 Q. And do you know why you would have passed 12:03:57</p> <p>7 her name along to Tom Barrack? 12:03:59</p> <p>8 A. Well, because she was in the events 12:04:04</p> <p>9 business and in the production business, so -- 12:04:07</p> <p>10 Q. Okay. I may have misunderstood you. I 12:04:14</p> <p>11 think a minute ago, you said that you didn't know if 12:04:17</p> <p>12 Tom Barrack had a role in the inauguration or not. 12:04:20</p> <p>13 A. No, I said I -- 12:04:20</p> <p>14 Q. Did I misunderstand? 12:04:26</p> <p>15 A. I think I said that I wasn't sure what his 12:04:26</p> <p>16 specific role was, but I knew he was involved. 12:04:29</p> <p>17 Q. Oh, okay. 12:04:32</p> <p>18 A. Like I said, I was not very connected with 12:04:37</p> <p>19 this opera -- the PIC. 12:04:41</p> <p>20 Q. Okay. Do you know who Rick Gates is? 12:04:44</p> <p>21 A. Yes. 12:04:54</p> <p>22 Q. And how do you know him? 12:04:57</p>
71	<p>1 Q. And who is Tom Barrack? 12:02:31</p> <p>2 A. Tom Barrack is -- is a real estate or a 12:02:35</p> <p>3 businessman from, from California we've known for 12:02:40</p> <p>4 some time. 12:02:44</p> <p>5 Q. And was he involved in the inauguration? 12:02:45</p> <p>6 A. I -- I believe yes. 12:02:48</p> <p>7 Q. The planning of it? 12:02:51</p> <p>8 A. You would have to ask him what his 12:02:54</p> <p>9 specific title and role, if any, was, but yes. 12:02:56</p> <p>10 Q. So are you, are you saying that you're not 12:03:02</p> <p>11 aware that he was the CEO of the PIC? 12:03:04</p> <p>12 A. Well, I've read that. But -- but that's 12:03:07</p> <p>13 not something we, we discussed at length. 12:03:11</p> <p>14 Q. Okay. 12:03:13</p> <p>15 A. Or at all. So yeah, I knew he was -- like 12:03:14</p> <p>16 I said, I knew he was involved, but I don't know, I 12:03:18</p> <p>17 didn't know what his title was. 12:03:21</p> <p>18 Q. Okay. Why did -- did you recommend 12:03:22</p> <p>19 Stephanie Winston Wolkoff to him? 12:03:26</p> <p>20 A. I have -- I have a vague recollection of 12:03:30</p> <p>21 that, I think. I'm not sure if he knew her before 12:03:33</p> <p>22 or -- or not, but I knew her as an acquaintance in, 12:03:39</p>	73	<p>1 A. I remember that he -- he worked on the 12:04:59</p> <p>2 campaign. So I remember him, that's where I met 12:05:08</p> <p>3 Rick. 12:05:14</p> <p>4 Q. And do you also know that -- whether or 12:05:17</p> <p>5 not he was involved with the PIC? 12:05:20</p> <p>6 A. I recall him working with Tom. But beyond 12:05:24</p> <p>7 that I don't know what his specific responsibilities 12:05:28</p> <p>8 were. 12:05:30</p> <p>9 Q. What is your understanding of what, of 12:05:32</p> <p>10 what the PIC was? 12:05:45</p> <p>11 A. Honestly I didn't have an understanding. 12:05:47</p> <p>12 We had never, we had never done this before and, at 12:05:50</p> <p>13 that point in time, my -- I was occupied with 12:05:52</p> <p>14 thinking about next steps for, for me and my family. 12:05:58</p> <p>15 It was a transition, so there's -- there's a lot of 12:06:03</p> <p>16 other things to, to think about. So as it pertained 12:06:06</p> <p>17 to anything related to the inauguration, it was what 12:06:09</p> <p>18 time do I need to be where? So it was really 12:06:16</p> <p>19 logistical curiosity. 12:06:19</p> <p>20 If somebody asked me a question, I'd give 12:06:22</p> <p>21 them my perspective or -- or feedback. But -- but I 12:06:24</p> <p>22 had no, I had no involvement, nor was I seeking to 12:06:27</p>

74	<p>1 have more things to do during that very busy period 12:06:30</p> <p>2 of time. 12:06:33</p> <p>3 Q. Sure. 12:06:46</p> <p>4 MS. WOODS: How are you doing? 12:06:46</p> <p>5 THE WITNESS: Good. If anyone else wants 12:06:47</p> <p>6 to take a break, that's fine. 12:06:52</p> <p>7 MS. WOODS: Hey, Jen? 12:06:53</p> <p>8 MS. JONES: Uh-huh? 12:06:55</p> <p>9 MS. WOODS: Are you almost done? 12:06:57</p> <p>10 MS. JONES: With life or with this one 12:06:59</p> <p>11 question or -- if you all want to take a lunch, we 12:07:04</p> <p>12 can take a lunch right now. 12:07:06</p> <p>13 THE WITNESS: I've got some time-sensitive 12:07:09</p> <p>14 stuff back at the office, so if, if it's -- if we 12:07:11</p> <p>15 think we are close to done, I'd love to power through 12:07:14</p> <p>16 and just skip lunch so I can get back earlier. If -- 12:07:18</p> <p>17 if not, we can -- I don't know is it possible to eat 12:07:22</p> <p>18 while we do this? I just -- 12:07:26</p> <p>19 MS. WOODS: We can take -- 12:07:30</p> <p>20 MS. JONES: I don't think we're close to 12:07:30</p> <p>21 done, but we can power through for a while. 12:07:33</p> <p>22 THE WITNESS: Could you, could you -- do 12:07:37</p>
75	<p>1 you have an estimate of -- of what time you think you 12:07:39</p> <p>2 can be done, just so I can manage my day? 12:07:41</p> <p>3 MS. JONES: Let's go off the record. 12:07:44</p> <p>4 THE WITNESS: Oh, thank you. 12:07:46</p> <p>5 THE VIDEOGRAPHER: Stand by. 12:07:48</p> <p>6 We're going off the record at 12:07:49</p> <p>7 (Discussion off the record.) 12:07:52</p> <p>8 THE VIDEOGRAPHER: Back on the record at 12:22:32</p> <p>9 12:22 p.m. 12:22:33</p> <p>10 BY MS. JONES: 12:22:37</p> <p>11 Q. Okay. So we were talking about the PIC 12:22:38</p> <p>12 and I asked you if you knew what the PIC was. I -- 12:22:39</p> <p>13 did you answer that question? I don't remember. 12:22:46</p> <p>14 A. I don't remember, either. I don't -- 12:22:49</p> <p>15 Q. I'll ask it again. Do you know what the 12:22:49</p> <p>16 PIC was? 12:22:49</p> <p>17 A. I have to say, I don't remember all the 12:22:54</p> <p>18 questions you asked me, but -- 12:23:00</p> <p>19 Q. Do you know what the PIC was, what its 12:23:01</p> <p>20 function was? 12:23:04</p> <p>21 A. It was involved in the inauguration. 12:23:06</p> <p>22 Q. And is it fair to say that during the -- 12:23:12</p>
76	<p>1 the planning of the inauguration hat there were 12:23:19</p> <p>2 several competing players that were -- were working 12:23:24</p> <p>3 to coordinate the inauguration? 12:23:30</p> <p>4 A. I -- I don't know what that means. 12:23:32</p> <p>5 Q. Well, was he PIC the only organiza 12:23:40</p> <p>6 tion that was working to set up the inaugura ion? 12:23:42</p> <p>7 A. Oh, I don't know. 12:23:47</p> <p>8 Q. You interacted wi h the PIC in a variety 12:23:51</p> <p>9 of ways in set ing up the inaugura ion, is that 12:24:00</p> <p>10 accurate? 12:24:04</p> <p>11 A. I told you I had a very limited 12:24:05</p> <p>12 involvement in anything related to the inauguration. 12:24:13</p> <p>13 Q. Were you involved in -- let me -- let's 12:24:21</p> <p>14 step back and go very general, then. What was your 12:24:24</p> <p>15 involvement -- 12:24:27</p> <p>16 THE WITNESS: I apologize, I need to take 12:24:28</p> <p>17 a break. Thank you. 12:24:32</p> <p>18 MS. WOODS: Sorry, Jen. 12:24:34</p> <p>19 THE VIDEOGRAPHER: Going off the record at 12:24:35</p> <p>20 12:24 p.m. 12:24:37</p> <p>21 (Off the record.) 12:24:40</p> <p>22 THE VIDEOGRAPHER: Back on the record at 12:39:38</p>
77	<p>1 12:39 p.m. 12:39:39</p> <p>2 BY MS. JONES: 12:39:51</p> <p>3 Q. I believe when the phone call came in, you 12:39:51</p> <p>4 were saying you didn't have much involvement in the 12:39:53</p> <p>5 inauguration. 12:39:55</p> <p>6 A. Correct. 12:39:56</p> <p>7 Q. Can you tell me what involvement you did 12:39:56</p> <p>8 have? 12:40:01</p> <p>9 A. As I -- as I mentioned, obviously we would 12:40:02</p> <p>10 be attending, it was my -- my father's inauguration, 12:40:05</p> <p>11 so a lot of it was just understanding where we were 12:40:10</p> <p>12 going, what weever was expected, if anything, of us 12:40:17</p> <p>13 in terms of attendance and just understanding 12:40:20</p> <p>14 really -- we had never been to an inauguration 12:40:24</p> <p>15 before, so it was all quite novel and, and new. 12:40:28</p> <p>16 Q. Now, do you recall being involved in a few 12:40:37</p> <p>17 different meetings with your father, President Trump, 12:40:44</p> <p>18 and Stephanie Winston Wolkoff about planning the 12:40:49</p> <p>19 inauguration? 12:40:53</p> <p>20 A. I -- I recall being in the office when, 12:40:54</p> <p>21 when she was there. I don't know if it was just she 12:40:59</p> <p>22 came in and I happened to be there, I walked in and 12:41:02</p>



78		80		
1	she was there. I -- so I don't recall specifically	12:41:05	1 Tom Barrack was planing the inaugura ion?	12:43:43
2	meeting on any given topic, but I do recall seeing	12:41:08	2 A. Well, I said "to speak with you about	12:43:46
3	her in the office.	12:41:11	3 planing the inauguration," so her, meaning her	12:43:53
4	MS. JONES: So -- let's go to something.	12:41:14	4 helping plan the inauguration.	12:43:56
5	Let's start, Leo, if you could put tab 7 in the	12:41:18	5 Q. Okay.	12:43:58
6	folder. And if everyone would hit refresh.	12:41:25	6 A. So like I said, I knew Tom was involved, I	12:43:59
7	THE WITNESS: Okay.	12:41:49	7 just don't know, I didn't know what his title was. I	12:44:01
8	MS. JONES: And this will be marked as	12:41:49	8 knew he was involved in planning, quote-unquote, the	12:44:03
9	Exhibit 54.	12:41:52	9 inauguration.	12:44:07
10	(Deposition Exhibit Number 54 was marked	12:41:57	10 Q. Okay. And you see in the, the e-mail	12:44:08
11	for identification and attached to the transcript.)	12:42:00	11 above it, it says it's from Mr. Barrack to Stephanie,	12:44:15
12	BY MS. JONES:	12:42:00	12 it appears and in the second sentence, "Ivanka has	12:44:20
13	Q. Can you take a look at that, that	12:42:01	13 spoken so highly of you and we are really in need of	12:44:23
14	document, Ms. Trump.	12:42:03	14 high-level event and marketing exper ise," do you see	12:44:26
15	A. Yes. Sorry, I'm scrolling to the bottom.	12:42:04	15 that?	12:44:29
16	Q. Okay. That's actually where I wanted,	12:42:08	16 A. Yeah, sorry, I'm just reading up the chain	12:44:29
17	where I wanted to take you to. The very first e-mail	12:42:10	17 because I hadn't read that yet.	12:44:31
18	in that, that chain, starts October -- excuse me, on	12:42:14	18 Q. It's the next e-mail up.	12:44:33
19	November 14th, 2015 at 9:34 p.m., do you see that?	12:42:18	19 A. Yeah, hold on just one second.	12:44:40
20	A. Yes.	12:42:22	20 Got it. I don't think -- okay. I	12:45:16
21	Q. And is that e-mail from you?	12:42:28	21 think -- I've -- yeah, I've read through it now.	12:45:18
22	A. It appears to be, yes.	12:42:30	22 Okay.	12:45:21
79		81		
1	Q. That's your e-mail address?	12:42:32	1 Q. Do you remember having discussions with	12:45:21
2	A. That is, yes.	12:42:34	2 Tom about Stephanie Winston Wolkoff?	12:45:24
3	Q. You say, "Hi Tom, Per our conversation, I	12:42:35	3 A. I believe I -- I just mentioned that I	12:45:28
4	want to connect you with Stephanie [...]"	12:42:42	4 vaguely remember recommending her. And obviously I'm	12:45:32
5	Did you have a meeting with Tom Barrack?	12:42:46	5 seeing the e-mail now where I did.	12:45:35
6	A. I don't believe we had a meeting. I -- I	12:42:49	6 Q. Okay. So when he says "Ivanka has spoken	12:45:37
7	think, I think it was a telephone conversation.	12:42:53	7 so highly of you," was that just in that one	12:45:40
8	Q. Okay.	12:42:57	8 conversation with him?	12:45:43
9	A. There may have been a meeting, I don't, I	12:42:59	9 A. Oh. I -- yeah. I couldn't imagine that	12:45:45
10	don't know. I'm sorry, but I vaguely recall it being	12:43:01	10 we had more than one.	12:45:47
11	a telephone conversation.	12:43:04	11 Q. Okay.	12:45:49
12	Q. Okay. And what, what was that	12:43:05	12 A. But maybe we did, I don't know. I mean, I	12:45:49
13	conversa ion about?	12:43:07	13 really, I didn't -- it was just an introduction, I	12:45:53
14	A. You know, I -- I don't know. But I'm	12:43:08	14 didn't know Stephanie that well, I just knew she was	12:45:56
15	looking at this e-mail and I connected him to -- to	12:43:14	15 very good at planning. I just knew her in that	12:45:59
16	Stephanie, so I'm guessing he probably asked if I had	12:43:17	16 capacity.	12:46:02
17	an opinion on -- on people who do events and she is a	12:43:21	17 Q. Prior to this e-mail -- and this e-mail	12:46:04
18	person I know in New York who does events.	12:43:28	18 that you sent was on November 14th, 2016. Prior to	12:46:06
19	Q. Okay. From looking at this e-mail, the	12:43:32	19 that, do you recall having a family meeting where it	12:46:12
20	second line there says, "She would be great for you	12:43:35	20 was discussed that Stephanie Winston Wolkoff should	12:46:15
21	to speak to about planning of the inauguration[...]"	12:43:37	21 be hired to help with this?	12:46:19
22	Does this e-mail help you remember that	12:43:41	22 A. No.	12:46:21

82	84
<p>1 Q. You don't remember Melania Trump 12:46:23</p> <p>2 mentioning it -- 12:46:25</p> <p>3 A. No. 12:46:27</p> <p>4 Q. -- in a meeting? 12:46:27</p> <p>5 A. No. 12:46:31</p> <p>6 Q. So how did you come up with the idea for 12:46:31</p> <p>7 Stephanie Win -- did you come one he idea that -- 12:46:33</p> <p>8 that she would be helpful? 12:46:35</p> <p>9 A. I don't know. It's possible that other 12:46:37</p> <p>10 people recommended her, as well, but she was -- this 12:46:39</p> <p>11 is what she does in New York, so it would be -- 12:46:44</p> <p>12 that's why I would have recommended her. 12:46:49</p> <p>13 Q. Had you worked with her before? 12:46:51</p> <p>14 A. Not personally, no. 12:46:53</p> <p>15 Q. So you had just like heard of her, is 12:46:55</p> <p>16 that -- 12:46:59</p> <p>17 A. No. I -- I knew her as an acquaintance. 12:46:59</p> <p>18 She planned other large-scale events in -- in New 12:47:02</p> <p>19 York. 12:47:07</p> <p>20 Q. What -- what o her events hat you knew of 12:47:08</p> <p>21 at he time that she had planned? 12:47:11</p> <p>22 A. So she worked for a long time at Vogue and 12:47:13</p>	<p>1 A. No. I -- I told you that I have. She 12:48:21</p> <p>2 planned events for Vogue for -- for years, so that's 12:48:25</p> <p>3 how I knew her as an acquaintance. She never planned 12:48:28</p> <p>4 events for me directly, but she planned many Vogue 12:48:31</p> <p>5 events that I attended. 12:48:35</p> <p>6 Q. Okay. Sorry. I didn't understand that 12:48:37</p> <p>7 you had attended those events. You said you knew her 12:48:39</p> <p>8 socially. I didn't realize you had been to the 12:48:43</p> <p>9 events she planned. 12:48:44</p> <p>10 A. No, no, no. That's -- that's how she was 12:48:45</p> <p>11 an acquaintance of mine. 12:48:47</p> <p>12 Q. Okay. So you had seen what she was 12:48:49</p> <p>13 capable of putting on as far as events go? 12:48:52</p> <p>14 A. Correct. That's why I recommended her. 12:48:55</p> <p>15 Q. Okay. That's what I was trying to 12:48:57</p> <p>16 understand is -- 12:49:01</p> <p>17 He said "You're a legend in this regard." 12:49:02</p> <p>18 Is hat -- was, in your opinion, was her name, I 12:49:09</p> <p>19 guess -- was she well-known for event planning in 12:49:14</p> <p>20 hese circles? 12:49:19</p> <p>21 A. She was -- yeah, she was well-known. 12:49:21</p> <p>22 For -- for years, she planned, as I mentioned, Vogue 12:49:24</p>
83	85
<p>1 planned events for them. 12:47:20</p> <p>2 Q. Do you see in that e-mail where 12:47:30</p> <p>3 Mr. Barrack says, "You are a living legend in that 12:47:32</p> <p>4 regard"? 12:47:35</p> <p>5 It's s ill in that, so the second e-mail, 12:47:36</p> <p>6 the e-mail right above yours where you introduce 12:47:38</p> <p>7 them. 12:47:41</p> <p>8 A. Oh, got it. 12:47:41</p> <p>9 Yes, I see that. 12:47:42</p> <p>10 Q. Yeah, in your opinion, is -- I mean, I'm 12:47:44</p> <p>11 trying to understand. So this inauguration, 12:47:52</p> <p>12 obviously a very big deal, right? 12:47:55</p> <p>13 A. Of course. 12:48:00</p> <p>14 Q. This event? 12:48:01</p> <p>15 A. The presidential -- I mean, what was the 12:48:02</p> <p>16 biggest deal was him standing and giving his speech. 12:48:03</p> <p>17 But yes, in our family's life, it was a very big 12:48:06</p> <p>18 deal. 12:48:09</p> <p>19 Q. Sure. So I'm trying to understand how, 12:48:09</p> <p>20 how Stephanie Winston Wolkoff got in the mix here. I 12:48:13</p> <p>21 mean, you recommended her, but you'd never seen any 12:48:17</p> <p>22 of her events? 12:48:20</p>	<p>1 events. So many other New Yorkers had attended and 12:49:27</p> <p>2 others had attended them over the years and -- and 12:49:32</p> <p>3 know Stephanie in that capacity as a point person on 12:49:35</p> <p>4 that. 12:49:38</p> <p>5 Q. And again forgive me, but are Vogue events 12:49:39</p> <p>6 large? I mean, are these big-scale events? 12:49:43</p> <p>7 A. They're all different sizes, I guess, the 12:49:47</p> <p>8 ones I've been to. But specifically I remember her 12:49:49</p> <p>9 as being the planner of the Met Ball, which is an 12:49:54</p> <p>10 annual event that's rather large in scale. 12:49:59</p> <p>11 Q. Did you consider anyone else for helping 12:50:12</p> <p>12 to plan this, this large-scale inauguration, or was 12:50:14</p> <p>13 Stephanie Winston Wolkoff your first thought or 12:50:19</p> <p>14 choice? 12:50:22</p> <p>15 A. She was -- I don't know if I passed along 12:50:22</p> <p>16 any other recommendations. But -- this makes sense 12:50:27</p> <p>17 to me as a recommendation, as I mentioned, given -- 12:50:31</p> <p>18 given the size of the event that she planned at the 12:50:34</p> <p>19 Metropolitan and -- and, and what I understood the 12:50:38</p> <p>20 inauguration to be. 12:50:42</p> <p>21 Q. Did you recommend anyone else, that you 12:50:44</p> <p>22 can remember? 12:50:46</p>

<b>86</b>	<p>1 <b>A. Not that I can remember.</b> 12:50:47</p> <p>2 MS. JONES: Leo, can you put tab 18 in the 12:51:09</p> <p>3 folder. 12:51:16</p> <p>4 THE WITNESS: Would one o'clock be okay 12:51:24</p> <p>5 for a lunch break? 12:51:26</p> <p>6 MS. JONES: Sure. 12:51:31</p> <p>7 THE WITNESS: Awesome. Thank you. 12:51:32</p> <p>8 MS. JONES: Okay. If you hit refresh in 12:51:34</p> <p>9 your file, it should come up as tab 18. 12:51:35</p> <p>10 Did it work? 12:51:58</p> <p>11 THE WITNESS: Okay. 12:52:01</p> <p>12 MS. JONES: Okay. And this will be 12:52:02</p> <p>13 Exhibit 55. 12:52:03</p> <p>14 (Deposition Exhibit Number 55 was marked 12:52:07</p> <p>15 for identification and attached to the transcript.) 12:52:07</p> <p>16 BY MS. JONES: 12:52:07</p> <p>17 Q. And I want to talk to you about is he 12:52:09</p> <p>18 very first e-mail on this chain, but feel free to 12:52:10</p> <p>19 look through it and familiarize yourself with it and 12:52:14</p> <p>20 just look up at me when you're ready to talk about 12:52:16</p> <p>21 it. 12:52:19</p> <p>22 <b>A. Got it. Give me a moment, please.</b> 12:52:29</p>
<b>87</b>	<p>1 <b>Got it, okay.</b> 12:54:47</p> <p>2 Q. Okay? So in the e-mail, where I want to 12:54:48</p> <p>3 start, it's the e-mail, it's the first e-mail on the 12:54:51</p> <p>4 chain. It's from Stephanie Winston Wolkoff on 12:54:54</p> <p>5 Saturday, September 3rd at 10:15 a.m., do you see 12:54:58</p> <p>6 that? 12:55:02</p> <p>7 <b>A. Yes.</b> 12:55:03</p> <p>8 Q. And that is to, it appears to be, to you 12:55:03</p> <p>9 and to Jared Kushner, is that right? 12:55:06</p> <p>10 <b>A. Yes.</b> 12:55:12</p> <p>11 Q. And who is Jared Kushner? 12:55:12</p> <p>12 <b>A. My husband.</b> 12:55:14</p> <p>13 Q. The very first sentence says, "I hope I am 12:55:18</p> <p>14 not disturbing you but I wanted to thank you for our 12:55:20</p> <p>15 meeting yesterday and follow up on our discussion so 12:55:22</p> <p>16 you both have insight and full transparency into my 12:55:24</p> <p>17 role." 12:55:28</p> <p>18 Do you recall having a meeting with her on 12:55:30</p> <p>19 December 2nd? 12:55:32</p> <p>20 <b>A. I don't.</b> 12:55:33</p> <p>21 Q. Do you recall having a meeting with her at 12:55:35</p> <p>22 all in relation to this e-mail? 12:55:37</p>
<b>88</b>	<p>1 <b>A. I recall her being in the office</b> 12:55:40</p> <p>2 <b>occasionally, so I, I would see her. But -- but I</b> 12:55:44</p> <p>3 <b>don't recall a meeting rela -- prior to this e-mail</b> 12:55:51</p> <p>4 <b>or around this e-mail or on this e-mail, no.</b> 12:55:54</p> <p>5 Q. Okay. Do you remember this e-mail at all? 12:55:57</p> <p>6 <b>A. No. I remember the topic, not the e-mail,</b> 12:56:02</p> <p>7 <b>that they were seeking to have me host an event.</b> 12:56:06</p> <p>8 Q. So that happens at the end of the e-mail. 12:56:09</p> <p>9 But this e-mail, did you just read it or skim it? 12:56:15</p> <p>10 <b>A. Yeah, I -- I just read it.</b> 12:56:17</p> <p>11 Q. And so you see that she is giving you a 12:56:19</p> <p>12 lot of details about strategy, what she's doing, 12:56:22</p> <p>13 what -- what her plans are. 12:56:26</p> <p>14 Do you recall her talking to you about all 12:56:28</p> <p>15 that? 12:56:29</p> <p>16 <b>A. I -- no.</b> 12:56:31</p> <p>17 Q. Okay. So if you go up one e-mail, after 12:56:34</p> <p>18 the e-mail she sends to you, it appears you reply to 12:56:41</p> <p>19 her on December 4th, 2016 at 5:42 p.m. 12:56:43</p> <p>20 Do you see that? 12:56:47</p> <p>21 <b>A. I do.</b> 12:56:48</p> <p>22 Q. And is that from your e-mail account? 12:56:48</p>
<b>89</b>	<p>1 <b>A. It is.</b> 12:56:51</p> <p>2 Q. Okay. You say, "Hello Stephanie. You 12:56:52</p> <p>3 should be in good hands but please let me know if you 12:56:55</p> <p>4 don't get the direction that you need from Reince" -- 12:56:58</p> <p>5 how do you say his name? 12:57:02</p> <p>6 <b>A. Reince.</b> 12:57:03</p> <p>7 Q. "-- Reince and Katie and I will step in." 12:57:05</p> <p>8 Who is Reince? 12:57:07</p> <p>9 <b>A. Reince, I don't know what his title was at</b> 12:57:09</p> <p>10 <b>the time, if he was officially chief of staff to the</b> 12:57:14</p> <p>11 <b>president-elect or being considered, but he was,</b> 12:57:19</p> <p>12 <b>prior to that during the campaign, the head of the</b> 12:57:24</p> <p>13 <b>RNC.</b> 12:57:26</p> <p>14 Q. And do you know why you're saying -- well, 12:57:32</p> <p>15 who's Katie? 12:57:34</p> <p>16 <b>A. I don't know which Katie. I am -- my</b> 12:57:35</p> <p>17 <b>guess would be Katie Walsh, which would be his</b> 12:57:39</p> <p>18 <b>deputy.</b> 12:57:42</p> <p>19 Q. Okay. And do you know what you're 12:57:42</p> <p>20 referring to when you say "[...]if you don't get the 12:57:48</p> <p>21 direction that you need from Reince and Katie[...]"? 12:57:50</p> <p>22 <b>A. I think my -- I'm passing her along to</b> 12:57:53</p>

90	<p>1 somebody who could answer her questions or, or give 12:57:59</p> <p>2 her direction. So I don't know, I can only, I can 12:58:02</p> <p>3 only guess from -- because I don't recall her 12:58:05</p> <p>4 original e-mail. But as, as you noted, there's a lot 12:58:07</p> <p>5 of stuff in there, so it looks like I'm passing her 12:58:12</p> <p>6 along to Reince and Katie. 12:58:14</p> <p>7 Q. If you go back down to the original e-mail 12:58:18</p> <p>8 that we were looking at and you see there's a series 12:58:30</p> <p>9 of bullet points? 12:58:33</p> <p>10 A. Yes. 12:58:35</p> <p>11 Q. Right, right below -- and, again, this is 12:58:36</p> <p>12 the e-mail that Stephanie Winston Wolkoff is writing 12:58:39</p> <p>13 to you and she says she is writing it after a meeting 12:58:42</p> <p>14 with you and Jared, right? Do you see that? At the, 12:58:45</p> <p>15 at the beginning of the e-mail, she says -- 12:58:52</p> <p>16 A. Yes. Yes, yes. Sorry, yes. 12:58:55</p> <p>17 Q. Okay. So just underneath those bullet 12:58:57</p> <p>18 points, where it starts with "Reince" -- "Reince," is 12:59:02</p> <p>19 that right? 12:59:07</p> <p>20 A. Reince. 12:59:07</p> <p>21 Q. Reince. 12:59:08</p> <p>22 It says, "Reince called me last night and 12:59:08</p>	92	<p>1 she says, "I will review this and the special 13:00:05</p> <p>2 protocol with her"? 13:00:09</p> <p>3 A. No, I do not. 13:00:11</p> <p>4 MS. JONES: Oh, it's one o'clock. Do you 13:00:20</p> <p>5 want to break for lunch? 13:00:22</p> <p>6 THE WITNESS: Do you mind? That would be 13:00:24</p> <p>7 great. Thank you so much. 13:00:26</p> <p>8 MS. JONES: Let me just look at this. Oh, 13:00:29</p> <p>9 you're gone. Okay. Let's go off the record. It's 13:00:30</p> <p>10 okay. 13:00:32</p> <p>11 THE WITNESS: Sorry. 13:00:33</p> <p>12 THE VIDEOGRAPHER: Going off the record at 13:00:33</p> <p>13 1:00 p.m. 13:00:34</p> <p>14 (Thereupon, a break was taken at one 13:00:35</p> <p>15 o'clock p.m. until 1:43 p.m., after which the 13:00:37</p> <p>16 following proceedings were had. ) 13:00:38</p> <p>17 THE VIDEOGRAPHER: Back on the record at 13:43:26</p> <p>18 1:43 p.m. 13:43:27</p> <p>19 BY MS. JONES: 13:43:33</p> <p>20 Q. Ms. Trump, do you still have that document 13:43:33</p> <p>21 we were just looking at? I believe it was tab 18. 13:43:35</p> <p>22 A. I do. 13:43:41</p>
91	<p>1 Katie will be reaching out this weekend, thank you. 12:59:10</p> <p>2 I will review his and the special protocol with her. 12:59:15</p> <p>3 As you know, there are so many different areas that 12:59:18</p> <p>4 need to have someone focus on them." 12:59:21</p> <p>5 A. I'm sorry -- where -- I'm sorry, where are 12:59:29</p> <p>6 you? 12:59:31</p> <p>7 MS. WOODS: It's below the bullets. 12:59:34</p> <p>8 MS. JONES: Uh-huh. 12:59:35</p> <p>9 THE WITNESS: Okay. Got it. I'm with you 12:59:36</p> <p>10 now. Go ahead. 12:59:37</p> <p>11 BY MS. JONES: 12:59:38</p> <p>12 Q. Okay. So "Reince called me last night and 12:59:38</p> <p>13 Katie will be reaching out this weekend, thank you." 12:59:40</p> <p>14 That indicates to me that you, you put 12:59:44</p> <p>15 them in touch with her. Does that indicate the same 12:59:47</p> <p>16 to you? 12:59:49</p> <p>17 A. As I noted before, I don't recall. 12:59:50</p> <p>18 Q. You don't -- 12:59:50</p> <p>19 A. I'm reading this. I don't recall this 12:59:54</p> <p>20 e-mail. This is four years ago, so -- but it's -- 12:59:56</p> <p>21 that's what it says. 13:00:01</p> <p>22 Q. Do you know what she's referring to when 13:00:02</p>	93	<p>1 Q. Okay. So we had just finished talking 13:43:42</p> <p>2 about the -- the portion of the e-mail hat was sent 13:43:49</p> <p>3 from Stephanie Winston Wolkoff to you on December 4th 13:43:53</p> <p>4 at 6 08. 13:43:56</p> <p>5 A. Yes. 13:43:58</p> <p>6 Q. Okay. No, we were talking about the one 13:44:14</p> <p>7 on December 4th at 5:42. But -- 13:44:16</p> <p>8 A. Okay. 13:44:19</p> <p>9 Q. -- now I'd like to draw your attention to 13:44:20</p> <p>10 he one above it that's at 6:08. 13:44:22</p> <p>11 A. Got it. 13:44:25</p> <p>12 Q. Do you see that one? 13:44:26</p> <p>13 A. Yep. 13:44:27</p> <p>14 Q. The first line there, it says "Hi Ivanka, 13:44:30</p> <p>15 it says I spoke with Reince and just got off the 13:44:33</p> <p>16 phone with Katie and all good, thank you." 13:44:35</p> <p>17 Do you know what she's referencing there? 13:44:38</p> <p>18 A. I don't. 13:44:39</p> <p>19 Q. Okay. You can close that document. 13:44:40</p> <p>20 And so you said that you didn't recall 13:45:03</p> <p>21 having a meeting with Ms. Wolkoff, Winston Wolkoff in 13:45:06</p> <p>22 early December. Do you recall having a meeting with 13:45:11</p>

94	<p>1 her and your father on December 16th? 13:45:13</p> <p>2 <b>A. Can you refresh my memory on the context</b> 13:45:16</p> <p>3 <b>of the meeting; it may help me recall it, since it</b> 13:45:19</p> <p>4 <b>was so long ago?</b> 13:45:22</p> <p>5 <b>Q. Sure. It looks like she, you and your</b> 13:45:24</p> <p>6 <b>father, at a minimum, discussed details of the</b> 13:45:31</p> <p>7 <b>inauguration, including music, the parade, things of</b> 13:45:35</p> <p>8 <b>that nature.</b> 13:45:40</p> <p>9 <b>A. I remember a conversation that, I believe,</b> 13:45:41</p> <p>10 <b>Stephanie was present at where there was some</b> 13:45:47</p> <p>11 <b>discussion as to who would be performing at the</b> 13:45:49</p> <p>12 <b>actual inauguration, either before or after the</b> 13:45:53</p> <p>13 <b>speech. But -- so I don't know if that's, if that</b> 13:45:58</p> <p>14 <b>was the same meeting.</b> 13:46:01</p> <p>15 <b>Q. And was that meeting with your father and</b> 13:46:04</p> <p>16 <b>Stephanie Winston Wolkoff and yourself?</b> 13:46:06</p> <p>17 <b>A. I remember a meeting with them with that</b> 13:46:09</p> <p>18 <b>being discussed, yes.</b> 13:46:14</p> <p>19 <b>Q. Okay. So this might be what you're</b> 13:46:36</p> <p>20 <b>referencing. Do you remember the you and your father</b> 13:46:38</p> <p>21 <b>confirmed that you do not want the Beach Boys at he</b> 13:46:39</p> <p>22 <b>inauguration performing?</b> 13:46:39</p>
95	<p>1 <b>A. I -- I don't recall that. I love the</b> 13:46:41</p> <p>2 <b>Beach Boys.</b> 13:46:42</p> <p>3 <b>Q. So you don't recall saying no to them</b> 13:46:42</p> <p>4 <b>performing, then?</b> 13:46:44</p> <p>5 <b>A. No.</b> 13:46:45</p> <p>6 <b>Q. Okay. Do you recall that you and your</b> 13:46:46</p> <p>7 <b>father discussed that you would like to have a full</b> 13:46:48</p> <p>8 <b>military parade, as well as tanks and helicopters on</b> 13:46:51</p> <p>9 <b>the ground during the parade?</b> 13:46:55</p> <p>10 <b>A. That I discussed that? No, I don't, I</b> 13:46:57</p> <p>11 <b>don't recall that.</b> 13:47:00</p> <p>12 <b>Q. Do you recall discussing that there would</b> 13:47:01</p> <p>13 <b>be no performances on the mall except for military</b> 13:47:04</p> <p>14 <b>pageantry?</b> 13:47:09</p> <p>15 <b>A. No.</b> 13:47:11</p> <p>16 <b>Q. Do you remember discussing with your</b> 13:47:12</p> <p>17 <b>father and Stephanie Winston Wolkoff that -- that you</b> 13:47:14</p> <p>18 <b>would be doing the pricing for the Trump Hotel for</b> 13:47:19</p> <p>19 <b>all the events?</b> 13:47:22</p> <p>20 <b>MS. WOODS: That she would be doing the</b> 13:47:26</p> <p>21 <b>what?</b> 13:47:28</p> <p>22 <b>MS. JONES: The pricing, discussing he</b> 13:47:29</p>
96	<p>1 pricing for the Trump Hotel for all events? 13:47:31</p> <p>2 <b>THE WITNESS: No.</b> 13:47:35</p> <p>3 <b>BY MS. JONES:</b> 13:47:35</p> <p>4 <b>Q. Did you, did your father put you as the</b> 13:47:36</p> <p>5 <b>point of contact for the events at the Trump Hotel,</b> 13:47:37</p> <p>6 <b>if there were any problems?</b> 13:47:40</p> <p>7 <b>A. No.</b> 13:47:43</p> <p>8 <b>Q. Do you recall Stephanie Winston Wolkoff</b> 13:47:43</p> <p>9 <b>reaching out to you for help with media with</b> 13:48:07</p> <p>10 <b>broadcas ing issues?</b> 13:48:09</p> <p>11 <b>A. No. I recall, though, that she -- that</b> 13:48:11</p> <p>12 <b>was part of what she was, she was working on. I</b> 13:48:19</p> <p>13 <b>think she mentioned it in passing that she was</b> 13:48:22</p> <p>14 <b>looking to, to find a broadcast sponsor or something,</b> 13:48:24</p> <p>15 <b>but it -- I was not involved. I have no recollection</b> 13:48:31</p> <p>16 <b>of being helpful or anything in that regard.</b> 13:48:36</p> <p>17 <b>MS. JONES: Leo, can you put tab ten in</b> 13:48:52</p> <p>18 <b>the folder, please. This will be Exhibit 56. And</b> 13:48:54</p> <p>19 <b>remember to hit refresh there.</b> 13:49:07</p> <p>20 <b>(Deposi ion Exhibit Number 56 was marked</b> 13:49:11</p> <p>21 <b>for identification and attached to the transcript.)</b> 13:49:35</p> <p>22 <b>MS. WOODS: I think I -- what is this,</b> 13:49:35</p>
97	<p>1 <b>ten?</b> 13:49:37</p> <p>2 <b>MS. JONES: Sorry?</b> 13:49:38</p> <p>3 <b>MS. WOODS: I'm just mumbling over here.</b> 13:49:39</p> <p>4 <b>That is tiny print, holy cow.</b> 13:49:43</p> <p>5 <b>THE WITNESS: Okay, I got it.</b> 13:49:52</p> <p>6 <b>BY MS. JONES:</b> 13:49:54</p> <p>7 <b>Q. Okay. Did you have a chance to review it?</b> 13:49:54</p> <p>8 <b>A. Got it.</b> 13:49:58</p> <p>9 <b>Q. Does that refresh your recollection?</b> 13:50:05</p> <p>10 <b>A. Yeah. I told you, it's like it was a</b> 13:50:08</p> <p>11 <b>vague discussion around or a vague memory of</b> 13:50:14</p> <p>12 <b>something relating to broadcast. This must be it.</b> 13:50:16</p> <p>13 <b>Q. Okay. So is it correct that this looks</b> 13:50:21</p> <p>14 <b>like a text message to your cell phone, he phone</b> 13:50:27</p> <p>15 <b>number we discussed earlier?</b> 13:50:29</p> <p>16 <b>A. Yes.</b> 13:50:32</p> <p>17 <b>Q. Okay. I won't read this whole hing to</b> 13:50:33</p> <p>18 <b>you.</b> 13:50:42</p> <p>19 <b>MR. BLALACK: Jen, just real quick, I'm</b> 13:50:43</p> <p>20 <b>not get ing this document. What -- okay, now it's</b> 13:50:44</p> <p>21 <b>come up. So could you authenticate what document I'm</b> 13:50:46</p> <p>22 <b>looking at?</b> 13:50:49</p>

98	<p>1 MS. JONES: Uh-huh. 13:50:49</p> <p>2 MR. BLALACK: Is this 918? 13:50:50</p> <p>3 MS. JONES: Yes, you got it. 13:50:56</p> <p>4 MR. BLALACK: Okay. Go ahead. 13:50:58</p> <p>5 BY MS. JONES: 13:51:02</p> <p>6 Q. I won't read you this whole document, it's 13:51:03</p> <p>7 in the record and you've already read it, but if I 13:51:04</p> <p>8 could just draw your attention to right in the 13:51:07</p> <p>9 middle, do you see where it says "[...]but Boris and 13:51:10</p> <p>10 his comms team[...]?" 13:51:15</p> <p>11 A. I do. 13:51:17</p> <p>12 Q. Who's -- who's Boris? 13:51:17</p> <p>13 A. I -- I don't know which Boris she's 13:51:21</p> <p>14 referring to. 13:51:23</p> <p>15 Q. Is there a Boris that had a comms team 13:51:25</p> <p>16 that you're aware of? 13:51:28</p> <p>17 A. There's a Boris that worked on the 13:51:30</p> <p>18 campaign that she may be referring to, but I -- I 13:51:34</p> <p>19 don't want to speculate. I think you should -- it 13:51:39</p> <p>20 would be better if you asked her. 13:51:42</p> <p>21 Q. Do you recall getting this text message? 13:51:48</p> <p>22 A. Well, I told you what I recall about this, 13:51:51</p>	100	<p>1 Q. Are you comfortable with that? Are you 13:53:27</p> <p>2 ready to keep going? 13:53:29</p> <p>3 A. Yes. 13:53:29</p> <p>4 MR. GARTEN: Yes. 13:53:35</p> <p>5 THE WITNESS: Thank you. 13:53:36</p> <p>6 BY MS. JONES: 13:53:36</p> <p>7 Q. Did you discuss, do you remember 13:53:36</p> <p>8 discussing photographers with Ms. Winston Wolkoff? 13:53:38</p> <p>9 A. No. 13:53:45</p> <p>10 Q. Do you recall sending her names of 13:53:51</p> <p>11 photographers who -- and asking her to see if she 13:53:54</p> <p>12 could find something for them to do? 13:54:00</p> <p>13 A. Something for them to do? No, I don't. 13:54:03</p> <p>14 Q. Something to photograph. You know, 13:54:06</p> <p>15 something to photograph during the inaugural events? 13:54:07</p> <p>16 A. No, I don't. 13:54:09</p> <p>17 Q. Do you recall discussing any, like, hair 13:54:11</p> <p>18 and makeup people with Stephanie Winston Wolkoff? 13:54:14</p> <p>19 A. For me? No. 13:54:20</p> <p>20 Q. Who -- no, no, no. Who might be able to 13:54:22</p> <p>21 help throughout the inauguration in various 13:54:24</p> <p>22 capacities. 13:54:27</p>
99	<p>1 which is a vague recollection about something about 13:51:55</p> <p>2 her seeking broadcasting. So I -- maybe that came 13:51:57</p> <p>3 from this text message. 13:52:00</p> <p>4 Q. Okay. Do you know what "[...]Boris and 13:52:03</p> <p>5 his comms team has not released the info," do you 13:52:07</p> <p>6 know what that means? 13:52:10</p> <p>7 A. I do not. 13:52:10</p> <p>8 Q. All right. At the very end of the text, 13:52:12</p> <p>9 it says in all capital letters, "We need your help"? 13:52:18</p> <p>10 A. I see that. 13:52:23</p> <p>11 Q. Did you help them with this situation? 13:52:23</p> <p>12 A. Not that I remember, no. 13:52:27</p> <p>13 Q. You can close that document. We're done 13:52:55</p> <p>14 with that. 13:52:59</p> <p>15 A. Alan, it logged out. 13:53:07</p> <p>16 Q. Do -- it logged out? 13:53:09</p> <p>17 A. Yes, I closed it. I closed the tab. Hold 13:53:10</p> <p>18 on, we'll get back in in a second. 13:53:13</p> <p>19 Q. While someone else is doing it for you, we 13:53:19</p> <p>20 can keep going, we're not going to look at another 13:53:21</p> <p>21 document for a minute. 13:53:25</p> <p>22 A. Okay. 13:53:26</p>	101	<p>1 A. If she would have asked me, I'm sure I 13:54:28</p> <p>2 would have sent her some recommendations for both, 13:54:31</p> <p>3 but I don't remember having that discussion with her. 13:54:34</p> <p>4 Q. Okay. And in addition to the beach boys, 13:54:42</p> <p>5 which we already discussed, do you recall having 13:54:46</p> <p>6 other discussions with her, Ms. Winston Wolkoff, 13:54:48</p> <p>7 about other potential performers? 13:54:51</p> <p>8 A. I remember Bocelli being discussed as -- 13:54:55</p> <p>9 as a performer and him coming in to the office. I 13:55:00</p> <p>10 think that may have been the only time that I was 13:55:04</p> <p>11 involved in a discussion around music. So it may 13:55:06</p> <p>12 have been -- maybe there was another discussion. 13:55:10</p> <p>13 I -- you said something about the Beach Boys, but I 13:55:12</p> <p>14 definitely didn't opine one way or another because I 13:55:15</p> <p>15 like the Beach Boys a lot. 13:55:21</p> <p>16 But Bocelli came in and I was in the 13:55:23</p> <p>17 office. I'm -- I'm not sure if I was there for that 13:55:24</p> <p>18 meeting, but I -- it could have been that I was in 13:55:28</p> <p>19 the office for another reason and when he came in. 13:55:30</p> <p>20 But I stayed for at least a portion of that meeting. 13:55:32</p> <p>21 Q. Do you know, in addition to our father's 13:55:35</p> <p>22 input obviously into the inauguration, who else was 13:55:53</p>

102	<p>1 helping give input into inaugural events from the 13:55:57</p> <p>2 family, do you know? 13:56:01</p> <p>3 <b>A. Well, I think this stuff, because 13:56:01</b></p> <p>4 <b>Stephanie knew many of us as acquaintances, even in 13:56:03</b></p> <p>5 <b>this, these e-mails that she's sending me, it feels 13:56:06</b></p> <p>6 <b>like she's just sort of asking to be pointed in a 13:56:07</b></p> <p>7 <b>direction, but -- so it's possible she reached out to 13:56:10</b></p> <p>8 <b>others, but I, you know, if I wasn't copied on it, I 13:56:13</b></p> <p>9 <b>don't know directly. 13:56:17</b></p> <p>10 <b>Q. Right. No, I mean putting aside 13:56:18</b></p> <p>11 <b>Ms. Winston Wolkoff, just -- just for you all, 13:56:26</b></p> <p>12 <b>planning an inauguration, I mean was your father 13:56:29</b></p> <p>13 <b>involved in some of he decisions of what would 13:56:31</b></p> <p>14 <b>happen, do you know? 13:56:33</b></p> <p>15 <b>A. You know, I think for -- well, I'll speak 13:56:34</b></p> <p>16 <b>for myself and this was all new to us. So a lot of, 13:56:36</b></p> <p>17 <b>a lot of my questions had to do with, well, what is 13:56:43</b></p> <p>18 <b>this, you know? You just reminded me of being asked 13:56:47</b></p> <p>19 <b>to host an event one of the nights, which I didn't 13:56:51</b></p> <p>20 <b>end up doing. But just understanding what a 13:56:56</b></p> <p>21 <b>presidential inauguration week looks like. 13:57:00</b></p> <p>22 <b>I think for most Americans, you know that 13:57:02</b></p>	104	<p>1 this week of events that I'm -- I'm guessing, 13:58:27</p> <p>2 although you correct me if I'm wrong, you probably 13:58:33</p> <p>3 had to be involved in a lot of the events. I imagine 13:58:34</p> <p>4 you were fairly busy that week? 13:58:37</p> <p>5 <b>A. Actually no. I didn't even get down to 13:58:39</b></p> <p>6 <b>Washington, I don't think, until Friday. I think -- 13:58:41</b></p> <p>7 <b>Q. Oh. 13:58:41</b></p> <p>8 <b>A. I would want to check my calendar. I 13:58:47</b></p> <p>9 <b>don't think I went to any of the other events, other 13:58:50</b></p> <p>10 <b>than on Friday, we got off the plane and -- and it 13:58:52</b></p> <p>11 <b>wasn't an event for this, we went to Arlington and 13:58:55</b></p> <p>12 <b>obviously the inauguration itself. There was a 13:59:01</b></p> <p>13 <b>dinner on Saturday night, but none of the others. So 13:59:04</b></p> <p>14 <b>I wasn't involved with those. 13:59:07</b></p> <p>15 <b>Q. Oh, okay. So you, you -- your 13:59:09</b></p> <p>16 <b>recollection is you arrived the day of the 13:59:13</b></p> <p>17 <b>inauguration? Or the night-- 13:59:15</b></p> <p>18 <b>A. No. 13:59:18</b></p> <p>19 <b>Q. -- before? 13:59:20</b></p> <p>20 <b>A. No, no, no. I arrived -- the 13:59:20</b></p> <p>21 <b>inauguration, it -- the inauguration was on a Friday. 13:59:26</b></p> <p>22 <b>I don't know, we'd, we'd have to go back and look. 13:59:36</b></p>
103	<p>1 seminal moment where a president is sworn into 13:57:04</p> <p>2 office, but all of the fanfare around that is -- is 13:57:07</p> <p>3 less, is less known. It was less known to me what 13:57:13</p> <p>4 was expected, if what we were supposed to attend, not 13:57:21</p> <p>5 supposed to attend. And so a lot of, a lot of the 13:57:26</p> <p>6 questions I had was, when should I be in Washington 13:57:28</p> <p>7 and where should I go, and -- and what is it? So 13:57:31</p> <p>8 it's kind of the things you would ask as the daughter 13:57:37</p> <p>9 of -- of a president-elect, more than as somebody 13:57:41</p> <p>10 wanting to be involved in any of the planning. 13:57:44</p> <p>11 <b>Obviously I'm happy to be helpful to the 13:57:47</b></p> <p>12 <b>extent I could be, but -- but that really, I mean 13:57:49</b></p> <p>13 <b>that's what my recollection is of my involvement 13:57:53</b></p> <p>14 <b>in -- in the inauguration, really just trying to kind 13:57:56</b></p> <p>15 <b>of understand what, where I was needed to the extent 13:57:59</b></p> <p>16 <b>that I was supposed to be somewhere. 13:58:02</b></p> <p>17 <b>Q. And how often would you say -- I mean in 13:58:05</b></p> <p>18 <b>the two months leading up, were there planning, it's 13:58:10</b></p> <p>19 <b>pretty much a whole week of events, is that right? 13:58:15</b></p> <p>20 <b>A. I -- I recall it was basically almost a 13:58:19</b></p> <p>21 <b>week of events. 13:58:21</b></p> <p>22 <b>Q. So in the, in he two months leading up to 13:58:22</b></p>	105	<p>1 <b>But I arrived with, I arrived with the president in 13:59:38</b></p> <p>2 <b>D.C. 13:59:42</b></p> <p>3 <b>Q. Okay. So did you attend like the 13:59:46</b></p> <p>4 <b>Leadership Luncheon at the Trump Hotel? 13:59:48</b></p> <p>5 <b>A. I don't think so. 13:59:51</b></p> <p>6 <b>Q. Oh, okay. So I hink you said you recall 13:59:53</b></p> <p>7 <b>going to Arlington, obviously the inauguration 13:59:58</b></p> <p>8 <b>itself. 14:00:04</b></p> <p>9 <b>And what o her events did you say that you 14:00:05</b></p> <p>10 <b>think you attended? 14:00:07</b></p> <p>11 <b>A. There was a candlelight dinner that I 14:00:08</b></p> <p>12 <b>attended which I believe was the night before the 14:00:13</b></p> <p>13 <b>inauguration. And I believe that was Friday night, 14:00:17</b></p> <p>14 <b>but I would have to go back and look at my calendar. 14:00:21</b></p> <p>15 <b>And then, and then the inauguration itself. And a 14:00:24</b></p> <p>16 <b>lunch in Capitol, at the Capitol, after the 14:00:37</b></p> <p>17 <b>inauguration. And I don't know what that was called, 14:00:42</b></p> <p>18 <b>but it's a customary, it's a traditional lunch that's 14:00:48</b></p> <p>19 <b>held with Members of Congress and -- yeah. 14:00:51</b></p> <p>20 <b>And then later on that day, there was the 14:00:58</b></p> <p>21 <b>parade and -- and the, I guess what's customary, 14:01:00</b></p> <p>22 <b>the -- the ball. 14:01:05</b></p>

106	<p>1 Q. Uh-huh. Okay. 14:01:09</p> <p>2 And you said that you arrived at the same 14:01:10</p> <p>3 time with your father, right? 14:01:13</p> <p>4 A. I -- I -- I think so. Whether he went 14:01:16</p> <p>5 down and back at some point in the week, I don't 14:01:19</p> <p>6 know. But -- but we arrived as, as a family. 14:01:21</p> <p>7 Q. And was that with your two brothers, as 14:01:29</p> <p>8 well? 14:01:31</p> <p>9 A. I had three little kids with me, so I was 14:01:32</p> <p>10 busy watching them, but I think my brothers were 14:01:36</p> <p>11 there. You can verify that. 14:01:39</p> <p>12 Q. So you can't -- 14:01:39</p> <p>13 A. They may have come down before, I'm not 14:01:43</p> <p>14 sure. I remember them being there. I don't know if 14:01:46</p> <p>15 they were there, though. 14:01:52</p> <p>16 Q. You definitely kept track of the three 14:01:52</p> <p>17 little kids, so you had them. 14:01:53</p> <p>18 A. Yes. 14:01:55</p> <p>19 Q. Okay. 14:01:55</p> <p>20 A. I remember that very clearly. I had an 14:01:55</p> <p>21 eight-month-old at the time who was traveling down 14:01:58</p> <p>22 with us, so -- 14:02:01</p>	108	<p>1 the last sentence there says -- well, the second to 14:03:54</p> <p>2 the last sentence says, "Do you have a few minutes to 14:03:57</p> <p>3 touch base tomorrow? I have something important and 14:03:59</p> <p>4 confidential to discuss with you. Thank you." 14:04:03</p> <p>5 A. I do. 14:04:05</p> <p>6 Q. Do you recall what that was that she 14:04:06</p> <p>7 wanted to talk to you about? 14:04:07</p> <p>8 A. I don't. 14:04:12</p> <p>9 Q. Do you remember meeting with her about 14:04:12</p> <p>10 anything that weekend of -- at the end of November? 14:04:17</p> <p>11 A. It was four years ago, I really, I don't. 14:04:23</p> <p>12 There was a lot going on at that point in our lives. 14:04:26</p> <p>13 Q. We talked a little bit earlier about 14:04:30</p> <p>14 Mr. Rick Gates, and you said that you would think he 14:04:50</p> <p>15 was on the campaign. Are you also aware that he was 14:04:53</p> <p>16 in -- in some form of leadership role at the PIC? 14:04:55</p> <p>17 A. I -- I believe that he worked with Tom 14:04:59</p> <p>18 Barrack. 14:05:03</p> <p>19 Q. In -- in planning the inauguration? 14:05:07</p> <p>20 A. In whatever capacity he was working with 14:05:09</p> <p>21 Tom. I mean, I was -- he was just with Tom, so -- 14:05:11</p> <p>22 Q. Did you understand that Tom's role -- I 14:05:15</p>
107	<p>1 Q. Okay. And when you say Arlington, is that 14:02:06</p> <p>2 the -- the, like, wreath-laying ceremony in the 14:02:19</p> <p>3 morning? 14:02:23</p> <p>4 A. Correct, at Arlington National Cemetery. 14:02:23</p> <p>5 MS. JONES: Okay. Leo, if you could drop 14:02:26</p> <p>6 tab 8 into the folder. 14:02:45</p> <p>7 Did you all get your folder back up, 14:02:49</p> <p>8 Ms. Trump? 14:02:52</p> <p>9 MS. WOODS: We did. We did. 14:02:53</p> <p>10 MS. JONES: Okay. 14:02:55</p> <p>11 You can probably hit refresh, let me know 14:03:27</p> <p>12 if it -- you got it. 14:03:29</p> <p>13 THE WITNESS: I got it. 14:03:29</p> <p>14 MS. JONES: So this will be Exhibit 57. 14:03:29</p> <p>15 (Deposition Exhibit Number 57 was marked 14:03:29</p> <p>16 for identification and attached to the transcript.) 14:03:34</p> <p>17 BY MS. JONES: 14:03:34</p> <p>18 Q. This one, to make sure we're looking at 14:03:35</p> <p>19 the same thing, it's an e-mail from Ms. Winston 14:03:38</p> <p>20 Wolkoff to you on 11-28-2016 at 1:13 p.m.? 14:03:40</p> <p>21 A. I see it. 14:03:45</p> <p>22 Q. Take a look at that. You see the last, 14:03:46</p>	109	<p>1 understand that you didn't know his title, but did 14:05:19</p> <p>2 you understand his role was planning the inauguration 14:05:21</p> <p>3 and the events involved? 14:05:23</p> <p>4 A. Yeah. I think, like I said before, I knew 14:05:25</p> <p>5 he was involved, I -- but, but if there had been 14:05:31</p> <p>6 three heads or two heads or what his title was, I 14:05:33</p> <p>7 didn't know. But I've known Tom for a long time, so 14:05:35</p> <p>8 I knew him, I knew that he was involved in it. 14:05:43</p> <p>9 Q. And -- and did you know -- I mean, I think 14:05:45</p> <p>10 you just said this, but you knew that Rick Gates was 14:05:47</p> <p>11 involved in some capacity in planning the 14:05:49</p> <p>12 inauguration? 14:05:52</p> <p>13 A. Yes. 14:05:53</p> <p>14 Q. Okay. Did you understand that the PIC was 14:05:56</p> <p>15 a non-profit organization? 14:06:04</p> <p>16 A. I'm not sure that I knew that, no. 14:06:06</p> <p>17 Q. Did you know how the PIC was coming up 14:06:13</p> <p>18 with money to pay for the inauguration? 14:06:16</p> <p>19 A. Well, I knew that they were fundraising to 14:06:19</p> <p>20 pay for the inauguration. Or I understood that's 14:06:24</p> <p>21 what's typically done. 14:06:31</p> <p>22 Q. And did you help in any capacity with 14:06:33</p>



110	<p>1 fundraising for the inauguration? 14:06:37</p> <p>2 <b>A. No.</b> 14:06:39</p> <p>3 <b>Q. Are you aware if either of your brothers</b> 14:06:40</p> <p>4 <b>helped in any capacity?</b> 14:06:43</p> <p>5 <b>A. I'm not.</b> 14:06:45</p> <p>6 <b>Q. The do you know -- well, let me ask you</b> 14:06:46</p> <p>7 <b>this.</b> 14:07:00</p> <p>8 <b>You said that you don't think you knew the</b> 14:07:01</p> <p>9 <b>PIC was a non-profit. Do you know now that the PIC</b> 14:07:03</p> <p>10 <b>was a non-profit?</b> 14:07:06</p> <p>11 <b>A. Yeah, I -- I don't think I'd ever thought</b> 14:07:07</p> <p>12 <b>about it, to be honest. I wasn't thinking too much</b> 14:07:10</p> <p>13 <b>about the PIC or how it was structured, so -- and</b> 14:07:13</p> <p>14 <b>like I said, this was our first inauguration, so I --</b> 14:07:15</p> <p>15 <b>I just hadn't thought about it.</b> 14:07:19</p> <p>16 <b>Q. Okay. Have you been involved in, in any</b> 14:07:21</p> <p>17 <b>non-profits prior to this inauguration?</b> 14:07:31</p> <p>18 <b>A. Yes.</b> 14:07:37</p> <p>19 <b>Q. What -- what non-profits have you been</b> 14:07:39</p> <p>20 <b>involved with and in what capacity?</b> 14:07:43</p> <p>21 <b>A. Well, over the years, different charitable</b> 14:07:46</p> <p>22 <b>organizations and, to a lesser or -- or smaller</b> 14:07:50</p>	112	<p>1 non-profit? 14:09:08</p> <p>2 <b>A. I believe so. I believe -- yeah, yeah, I</b> 14:09:13</p> <p>3 <b>believe it was called the board, Yeah.</b> 14:09:22</p> <p>4 <b>Q. And what non-profit boards were you on?</b> 14:09:22</p> <p>5 <b>A. Well, I was on the board of A Hundred -- A</b> 14:09:25</p> <p>6 <b>Hundred Women in Hedge Funds for a period of -- of</b> 14:09:33</p> <p>7 <b>time. I was on the board of the Trump Foundation.</b> 14:09:39</p> <p>8 <b>Q. Were those the only two that you can</b> 14:09:48</p> <p>9 <b>recall?</b> 14:09:50</p> <p>10 <b>A. Yes.</b> 14:09:51</p> <p>11 <b>Q. Let's talk about on the -- the week of the</b> 14:10:29</p> <p>12 <b>inauguration on that Friday night, January 20th,</b> 14:10:32</p> <p>13 <b>there was supposed to be an event held at the Trump</b> 14:10:35</p> <p>14 <b>Hotel. Do you know what I'm referring to?</b> 14:10:40</p> <p>15 <b>A. I -- I don't, no.</b> 14:10:42</p> <p>16 <b>MS. JONES: Leo, can you put tab 6 into</b> 14:10:48</p> <p>17 <b>the folder, please.</b> 14:10:52</p> <p>18 <b>(Deposition Exhibit Number 58 was marked</b> 14:11:00</p> <p>19 <b>for identification and attached to the transcript.)</b> 14:11:18</p> <p>20 <b>MS. JONES: Okay. You should be able to</b> 14:11:18</p> <p>21 <b>refresh it now.</b> 14:11:20</p> <p>22 <b>THE WITNESS: Got it.</b> 14:11:41</p>
111	<p>1 <b>degree, lesser being, you know, attending and</b> 14:07:56</p> <p>2 <b>supporting an organization through a donation or</b> 14:07:59</p> <p>3 <b>attendance at an event that furthers their</b> 14:08:04</p> <p>4 <b>objectives, or -- or in some cases, co-founding an</b> 14:08:07</p> <p>5 <b>initiative.</b> 14:08:14</p> <p>6 <b>Q. What -- what initiatives did you found?</b> 14:08:21</p> <p>7 <b>Co-found --</b> 14:08:24</p> <p>8 <b>MS. WOODS: Hold on, objection.</b> 14:08:24</p> <p>9 <b>Jen, she just testified that she had no</b> 14:08:26</p> <p>10 <b>idea the PIC was a not-for-profit and, frankly, I</b> 14:08:30</p> <p>11 <b>told her yesterday. So if you're going to go down</b> 14:08:33</p> <p>12 <b>this whole line of questioning around what she</b> 14:08:35</p> <p>13 <b>should've know or did or didn't do with regard to the</b> 14:08:38</p> <p>14 <b>PIC based on her non-information about it being a</b> 14:08:40</p> <p>15 <b>not-for-profit, that's going to waste a lot of time</b> 14:08:41</p> <p>16 <b>today.</b> 14:08:43</p> <p>17 <b>BY MS. JONES:</b> 14:08:44</p> <p>18 <b>Q. Okay. What organizations did you co-find?</b> 14:08:44</p> <p>19 <b>A. The Girl Up initiative at the United</b> 14:08:48</p> <p>20 <b>Nations Foundation, would be an example. That may</b> 14:08:53</p> <p>21 <b>have been the only one I -- I co-founded.</b> 14:09:01</p> <p>22 <b>Q. Okay. Have you sat on the board of any</b> 14:09:03</p>	113	<p>1 <b>MS. JONES: We'll see if I can get it</b> 14:11:44</p> <p>2 <b>here.</b> 14:11:46</p> <p>3 <b>This will be, we are on 58, I believe.</b> 14:11:53</p> <p>4 <b>Exhibit 58.</b> 14:11:59</p> <p>5 <b>MS. MIRANDA: Yes.</b> 14:12:04</p> <p>6 <b>MS. JONES: Okay.</b> 14:12:05</p> <p>7 <b>THE WITNESS: Okay.</b> 14:12:09</p> <p>8 <b>BY MS. JONES:</b> 14:12:09</p> <p>9 <b>Q. Okay. So if you can look at the -- are</b> 14:12:10</p> <p>10 <b>you saying "okay" because you've reviewed it, you've</b> 14:12:14</p> <p>11 <b>had a chance to review it?</b> 14:12:16</p> <p>12 <b>A. Yeah, I'm looking at it now.</b> 14:12:18</p> <p>13 <b>Q. Okay.</b> 14:12:20</p> <p>14 <b>A. I have it pulled up.</b> 14:12:21</p> <p>15 <b>Q. Okay. So the second e-mail there right in</b> 14:12:22</p> <p>16 <b>the middle, it says it's from Rick Gates, sent</b> 14:12:25</p> <p>17 <b>January 11th, 2017, at 2:10 p.m. Do you see that?</b> 14:12:29</p> <p>18 <b>A. I do.</b> 14:12:33</p> <p>19 <b>Q. Okay. And that's your e-mail address that</b> 14:12:33</p> <p>20 <b>it's sent to, correct?</b> 14:12:37</p> <p>21 <b>A. It is.</b> 14:12:39</p> <p>22 <b>Q. And there's a courtesy copy with Stephanie</b> 14:12:40</p>

114	<p>1 Winston Wolkoff on it? 14:12:43</p> <p>2 <b>A. I see that.</b> 14:12:45</p> <p>3 <b>Q. Who is Susan Acosta?</b> 14:12:46</p> <p>4 <b>A. She was my assistant.</b> 14:12:48</p> <p>5 <b>Q. Okay. And she's also cc'd here?</b> 14:12:50</p> <p>6 <b>A. She is.</b> 14:12:54</p> <p>7 <b>Q. The subject of this is "Family Portrait,"</b> 14:12:57</p> <p>8 <b>and I want to direct you to the middle of the -- of</b> 14:13:00</p> <p>9 <b>the e-mail that starts with "also," it's the third</b> 14:13:05</p> <p>10 <b>line down, near the end of that sentence. It says,</b> 14:13:09</p> <p>11 <b>"Also there will be an after party at the OPO."</b> 14:13:13</p> <p>12 <b>Do you see that?</b> 14:13:16</p> <p>13 <b>A. I do.</b> 14:13:17</p> <p>14 <b>Q. Okay. And is "OPO," does that stand for</b> 14:13:18</p> <p>15 <b>"Old Post Office"?</b> 14:13:21</p> <p>16 <b>A. It does.</b> 14:13:23</p> <p>17 <b>Q. Okay. It says, "Also there will be an</b> 14:13:24</p> <p>18 <b>after party at the OPO following the inaugural balls</b> 14:13:27</p> <p>19 <b>on Friday."</b> 14:13:30</p> <p>20 <b>"DJT," is that referring to Donald J.</b> 14:13:34</p> <p>21 <b>Trump?</b> 14:13:37</p> <p>22 <b>A. I -- I would think so, yeah.</b> 14:13:39</p>
115	<p>1 <b>Q. "DJT" is used throughout a lot of these</b> 14:13:43</p> <p>2 <b>e-mails, so I --</b> 14:13:45</p> <p>3 <b>A. Yes.</b> 14:13:46</p> <p>4 <b>Q. Okay. "DJT is not expected to attend but</b> 14:13:47</p> <p>5 <b>was more for you, Don and Eric."</b> 14:13:51</p> <p>6 <b>A. Yes.</b> 14:13:56</p> <p>7 <b>Q. Does that refresh your memory about a</b> 14:13:57</p> <p>8 <b>party at the Trump Hotel?</b> 14:13:59</p> <p>9 <b>A. It does not.</b> 14:14:01</p> <p>10 <b>MS. JONES: Okay. Can -- Leo, can you put</b> 14:14:02</p> <p>11 <b>in tab 12, please. Tab 12 will be Exhibit 59. It</b> 14:14:26</p> <p>12 <b>should be in there now, so you can refresh.</b> 14:14:38</p> <p>13 <b>(Deposition Exhibit Number 59 was marked</b> 14:14:40</p> <p>14 <b>for identification and attached to the transcript.)</b> 14:14:40</p> <p>15 <b>MS. JONES: So sorry, all, may I have just</b> 14:14:54</p> <p>16 <b>one minute? My computer's dying. One second.</b> 14:14:55</p> <p>17 <b>BY MS. JONES:</b> 14:14:55</p> <p>18 <b>Q. Okay. So this e-mail, you are -- sorry.</b> 14:15:16</p> <p>19 <b>This, this e-mail, you're not, you're not</b> 14:15:30</p> <p>20 <b>on.</b> 14:15:33</p> <p>21 <b>A. Okay.</b> 14:15:34</p> <p>22 <b>Q. So I just want to draw your attention to</b> 14:15:35</p>
116	<p>1 <b>the very last paragraph, it says, "FYI, my</b> 14:15:38</p> <p>2 <b>understanding is there is no event at all for the</b> 14:15:42</p> <p>3 <b>Trump D.C. hotel now. There was some Ivanka event</b> 14:15:45</p> <p>4 <b>for her friends. Due to the transportation situation</b> 14:15:47</p> <p>5 <b>that was an after party, but she is doing it</b> 14:15:51</p> <p>6 <b>somewhere else now which is walking distance to the</b> 14:15:53</p> <p>7 <b>convention center."</b> 14:15:56</p> <p>8 <b>Do you recall at some point planning an</b> 14:15:58</p> <p>9 <b>event at the Trump Hotel and then moving it to --</b> 14:16:00</p> <p>10 <b>closer to the convention center?</b> 14:16:03</p> <p>11 <b>A. I don't.</b> 14:16:05</p> <p>12 <b>Q. Okay.</b> 14:16:06</p> <p>13 <b>A. Nor did I have an event that night. I</b> 14:16:15</p> <p>14 <b>went home after the ball.</b> 14:16:18</p> <p>15 <b>Q. So you just said nor did you have an event</b> 14:16:33</p> <p>16 <b>that night. I take it, did you go to the inaugural</b> 14:16:36</p> <p>17 <b>balls, at least some of them?</b> 14:16:39</p> <p>18 <b>A. Yes, I did.</b> 14:16:41</p> <p>19 <b>Q. Okay.</b> 14:16:42</p> <p>20 <b>A. But I didn't have, I didn't go anywhere</b> 14:16:42</p> <p>21 <b>after those.</b> 14:16:45</p> <p>22 <b>Q. Okay. You didn't go back to the Trump</b> 14:16:45</p>
117	<p>1 <b>Hotel to an after party?</b> 14:16:48</p> <p>2 <b>A. I don't think so. I mean, I'm seeing this</b> 14:16:49</p> <p>3 <b>traffic but I'm -- I'm 99.9 percent sure that I did</b> 14:16:51</p> <p>4 <b>not. It's a long day.</b> 14:16:59</p> <p>5 <b>Q. Okay. Let me ask, do you know if your</b> 14:17:03</p> <p>6 <b>brothers went to an after party at the hotel?</b> 14:17:04</p> <p>7 <b>A. I don't know.</b> 14:17:08</p> <p>8 <b>Q. Okay. Ms. Trump, do you know who Tommy</b> 14:17:12</p> <p>9 <b>Hicks, Jr. is?</b> 14:17:14</p> <p>10 <b>A. I do.</b> 14:17:17</p> <p>11 <b>Q. Who is that?</b> 14:17:18</p> <p>12 <b>A. He is -- he's a friend of my brother and I</b> 14:17:21</p> <p>13 <b>guess all of ours. He's --he's a good guy.</b> 14:17:29</p> <p>14 <b>Q. When you say "a friend of my brother,"</b> 14:17:34</p> <p>15 <b>which one are you referring to?</b> 14:17:35</p> <p>16 <b>A. Don.</b> 14:17:37</p> <p>17 <b>Q. Was -- was Mr. Hicks involved in the</b> 14:17:38</p> <p>18 <b>inauguration in any way that you're aware of?</b> 14:17:44</p> <p>19 <b>A. I don't know.</b> 14:17:48</p> <p>20 <b>Q. Do you know if he was involved in the</b> 14:17:51</p> <p>21 <b>campaign?</b> 14:17:52</p> <p>22 <b>A. He was very passionate about the campaign.</b> 14:17:54</p>

<b>118</b>		<b>120</b>			
1	<b>I don't know if he had a formal role. But he</b>	14:17:58	1	breakfast group did in fact sue the PIC over that	14:21:01
2	<b>definitely was very passionate about wanting the</b>	14:18:01	2	event space at the Trump Hotel?	14:21:05
3	<b>president to win.</b>	14:18:05	3	<b>A. No.</b>	14:21:08
4	Q. And does Mr. Hicks, does he live in D.C.	14:18:09	4	MS. JONES: Okay. I want to ask you a	14:21:15
5	or elsewhere?	14:18:12	5	question about -- Leo, can you put tab 15.	14:21:23
6	<b>A. And I -- I should clarify, I'm talking</b>	14:18:13	6	(Deposition Exhibit Number 60 was marked	14:21:41
7	<b>obviously about 2016, because he actually -- this</b>	14:18:15	7	for identification and attached to the transcript.)	14:21:44
8	<b>past cycle, he had a formal role with the RNC.</b>	14:18:18	8	MS. JONES: Okay, it's in there. So if	14:21:44
9	Q. Okay, thank you. Yeah, that, that's	14:18:21	9	you hit refresh, it should show up.	14:21:46
10	helpful, and that's what I'm talking about, as well.	14:18:24	10	BY MS. JONES:	14:22:02
11	Is he -- does he live in D.C. or does he	14:18:26	11	Q. Did you stay at the Trump Hotel when you	14:22:03
12	live -- or back in 2016, did he live somewhere else?	14:18:29	12	were in town for the inauguration?	14:22:05
13	<b>A. I think he lived in Texas.</b>	14:18:33	13	<b>A. No, I didn't.</b>	14:22:06
14	Q. Okay. Did you -- did you attend any	14:18:35	14	Q. Do you have it?	14:22:07
15	events at the Trump Hotel that week, the week of the	14:18:59	15	<b>A. I do. I'm seeing it now, thank you.</b>	14:22:24
16	inauguration?	14:19:03	16	Q. So this, this is another one that you are	14:22:26
17	<b>A. I actually don't think so. No, I don't</b>	14:19:05	17	not on, but I just have a question about it. It says	14:22:27
18	<b>think so.</b>	14:19:16	18	here -- this, I'm sorry. This is, I believe, Exhibit	14:22:33
19	Q. Okay. What about the Kushner family, did	14:19:20	19	<b>60.</b>	
20	they have an event at the Trump Hotel?	14:19:23	20	You see here that it says, "The following	14:22:49
21	<b>A. No, but I -- I believe they were staying</b>	14:19:26	21	list of guests will have a gift box from Capitol	14:22:52
22	<b>at the hotel.</b>	14:19:31	22	Luncheon delivered." Do you know what Capitol	14:23:00
<b>119</b>		<b>121</b>			
1	Q. So you're not aware of any event space	14:19:34	1	Luncheon is?	14:23:02
2	that they were using at the hotel?	14:19:36	2	<b>A. I think it was the luncheon I was</b>	14:23:02
3	<b>A. Oh, no. They came for the inauguration.</b>	14:19:38	3	<b>referring to before at the Capitol Building. That</b>	14:23:06
4	Q. Are you familiar with the -- are you	14:19:42	4	<b>would be my guess, what they're referring to here.</b>	14:23:08
5	familiar with the fact that the Trump Hotel had --	14:19:59	5	Q. Okay. Do you recall ever getting a gift	14:23:10
6	let me, let me, let me do it a different way.	14:20:06	6	from them?	14:23:13
7	Are you familiar with the fact that the	14:20:10	7	<b>A. I don't.</b>	14:23:13
8	national -- or Presidential Inaugural Prayer	14:20:12	8	Q. If you could just, if you wouldn't mind	14:23:15
9	Breakfast had space reserved at the Trump Hotel for	14:20:16	9	just taking a look at that list of names.	14:23:18
10	Friday morning of the inauguration?	14:20:19	10	Are those all Trump family members or are	14:23:22
11	<b>A. I had heard that actually, I think</b>	14:20:23	11	some of them friends?	14:23:28
12	<b>yesterday, but -- but I, I don't recall knowing that</b>	14:20:28	12	<b>A. No, they're all Trump family members.</b>	14:23:29
13	<b>prior.</b>	14:20:30	13	MS. JONES: Okay. You can close that.	14:23:42
14	Q. Okay. Do you -- do you recall the Trump	14:20:31	14	MS. WOODS: Don't touch it. We'll close	14:23:44
15	Hotel facing a possible lawsuit because of attempting	14:20:37	15	it.	14:23:48
16	to cancel that event space?	14:20:40	16	MS. JONES: Yeah, don't close it.	14:23:56
17	<b>A. No.</b>	14:20:43	17	BY MS. JONES:	14:23:56
18	Q. And have you -- have you heard of that,	14:20:47	18	Q. You said that you did not stay at the	14:23:56
19	have you ever heard of that until I just brought that	14:20:50	19	Trump Hotel for the inauguration. Where did you	14:23:58
20	up to you?	14:20:52	20	stay?	14:24:01
21	<b>A. Not that I remember.</b>	14:20:54	21	<b>A. At the Blair House, prior to the</b>	14:24:01
22	Q. Are you aware that the -- the prayer	14:20:58	22	<b>inauguration.</b>	14:24:05

122		124			
1	Q. Okay. Did you stay at the Trump Hotel at	14:24:07	1	<b>ended up staying at the hotel or – or, or elsewhere.</b>	14:27:21
2	all during that week?	14:24:11	2	Q. And do you recall if those rooms would	14:27:26
3	<b>A. I don't believe so.</b>	14:24:13	3	have been comped?	14:27:28
4	Q. Was Mr. Kushner and your kids also at the	14:24:19	4	<b>A. I don't.</b>	14:27:30
5	Blair House?	14:24:24	5	Q. Who would make he decision if a room was	14:27:32
6	<b>A. They were.</b>	14:24:25	6	comped for a family member?	14:27:36
7	Q. And what about your brothers, did they	14:24:27	7	<b>A. Gosh. I mean, I – I don't know. I mean,</b>	14:27:39
8	stay at the Blair House with you or elsewhere?	14:24:29	8	<b>I don't recall having the conversation, so I'm</b>	14:27:46
9	<b>A. I believe they stayed at the Blair House,</b>	14:24:32	9	<b>guessing that – I don't know. Maybe – probably</b>	14:27:49
10	<b>as well.</b>	14:24:35	10	<b>Mickael, who was managing the hotel.</b>	14:27:54
11	Q. And did Tiffany stay there, as well?	14:24:35	11	Q. And you don't recall having any	14:28:04
12	<b>A. I – I think she did, yes. I think we, we</b>	14:24:50	12	conversations with Ms. Trump, Melania Trump, about --	14:28:05
13	<b>all stayed there.</b>	14:24:56	13	about rooms for her family or friends?	14:28:10
14	Q. Okay. Did you set aside rooms at the	14:24:57	14	<b>A. No. I think I -- I just said I do recall</b>	14:28:12
15	Trump Hotel to use to, like, change clothes, freshen	14:25:16	15	<b>having early on a conversation about her parents,</b>	14:28:15
16	up during the parade?	14:25:22	16	<b>just if we, if we needed, if they needed a place to</b>	14:28:22
17	<b>A. No. We had very little time during the --</b>	14:25:25	17	<b>stay.</b>	14:28:26
18	<b>we were run, run, run, so no, I – I don't recall</b>	14:25:33	18	Q. Do you recall having conversations about	14:28:30
19	<b>ever going anywhere to freshen, to the hotel to</b>	14:25:36	19	who would pay for that?	14:28:33
20	<b>freshen up.</b>	14:25:39	20	<b>A. No.</b>	14:28:34
21	Q. Do you recall if you reserved a room to be	14:25:40	21	Q. What was your involvement in -- in guest	14:28:35
22	held for that purpose?	14:25:43	22	rooms, reserving guest rooms, for other people during	14:28:42
123		125			
1	<b>A. I don't.</b>	14:25:45	1	the inauguration?	14:28:45
2	Q. Did you reserve or have any rooms reserved	14:25:48	2	<b>A. Oh, gosh. As – as little as possible. I</b>	14:28:46
3	for you for any purpose during that week?	14:25:50	3	<b>wanted to make sure that, you know, that we had – we</b>	14:28:51
4	<b>A. There may have been a room reserved, but</b>	14:25:55	4	<b>knew where we were going and that I would not have</b>	14:28:58
5	<b>I – I don't know. I didn't – I have no</b>	14:25:58	5	<b>wanted to be a travel agent for – for anyone. So I</b>	14:29:01
6	<b>recollection of staying there. I am quite sure that</b>	14:26:01	6	<b>mean, I'm sure there was, I'm sure at that time there</b>	14:29:07
7	<b>I did not, but --</b>	14:26:03	7	<b>must have been a lot of incoming with questions from</b>	14:29:10
8	Q. What about, did you have rooms set aside	14:26:10	8	<b>people, just like we had questions about what was</b>	14:29:14
9	for Mr. Kushner's family?	14:26:12	9	<b>going on, what day do I arrive, where do we stay? I</b>	14:29:16
10	<b>A. I recall that they did stay there. Or at</b>	14:26:15	10	<b>remember having that conversation with my own mother.</b>	14:29:20
11	<b>one point, the plan was for them to stay there.</b>	14:26:20	11	<b>But likely I would have passed it along to somebody</b>	14:29:23
12	<b>Whether or not they actually did or not, I don't</b>	14:26:22	12	<b>who could have managed that inflow and -- and given</b>	14:29:26
13	<b>exactly remember. But – but at one point, the plan</b>	14:26:24	13	<b>better answers than I could.</b>	14:29:28
14	<b>was for them to stay there, yes.</b>	14:26:27	14	Q. Where did your own mother stay?	14:29:30
15	Q. Okay. Do you recall if those rooms were,	14:26:30	15	<b>A. I remember at one point she wanted to stay</b>	14:29:33
16	whether they stayed or not, if they were supposed to	14:26:40	16	<b>at the hotel and it was full or – I – I think she</b>	14:29:37
17	be comped?	14:26:42	17	<b>ended up staying there, but – but that's why it's –</b>	14:29:40
18	<b>A. No, I don't recall that.</b>	14:26:44	18	<b>it's, it's much easier to have a general manager who</b>	14:29:45
19	Q. Did you set aside rooms for Melania Trump?	14:26:49	19	<b>deals with that stuff. I'm not in the business of --</b>	14:29:49
20	<b>A. I recall early on having a con – I think</b>	14:26:58	20	<b>of running hotels or bookings, thankfully.</b>	14:29:51
21	<b>it was a conversation about her parents and where</b>	14:27:15	21	Q. Did -- do you know if your mother's hotel	14:29:56
22	<b>they were staying. But I – I don't know if they</b>	14:27:18	22	room was comped?	14:29:59

126	<p>1 A. I don't. 14:30:01</p> <p>2 Q. Has anybody ever asked, friends, family, 14:30:04</p> <p>3 do they ever ask you if you'll comp their -- get 14:30:07</p> <p>4 their rooms comped for them? 14:30:11</p> <p>5 MS. WOODS: Jen, we went over this this 14:30:14</p> <p>6 morning. 14:30:17</p> <p>7 THE WITNESS: They have asked, they have 14:30:17</p> <p>8 asked me in the past. 14:30:18</p> <p>9 BY MS. JONES: 14:30:19</p> <p>10 Q. And -- and do you take steps to get them 14:30:20</p> <p>11 comped? 14:30:22</p> <p>12 A. It depends on who the person who's asking 14:30:24</p> <p>13 is. 14:30:30</p> <p>14 Q. Has there been times where you've taken 14:30:31</p> <p>15 steps to get the rooms comped? 14:30:33</p> <p>16 MS. WOODS: Hold on. We're talking about 14:30:36</p> <p>17 this hotel? 14:30:37</p> <p>18 THE WITNESS: I'm talking about hotels in 14:30:38</p> <p>19 general. I believe that -- as I said earlier, the 14:30:39</p> <p>20 hotel had just opened and I left the company very 14:30:41</p> <p>21 shortly thereafter, so there would have been a very 14:30:48</p> <p>22 limited period of time where I could've helped 14:30:50</p>	128	<p>1 and this will be Exhibit 61. 14:32:33</p> <p>2 MS. WOODS: 13. 14:32:41</p> <p>3 MS. JONES: Do you have it? 14:33:01</p> <p>4 THE WITNESS: I do. 14:33:03</p> <p>5 BY MS. JONES: 14:33:03</p> <p>6 Q. So we'll start at the -- if you scroll to 14:33:03</p> <p>7 the bottom, we will start at the first e-mail. You 14:33:05</p> <p>8 see that that is November 22nd, 2016, at 1:29 p.m.? 14:33:08</p> <p>9 And that's from you, from your e-mail, is that 14:33:21</p> <p>10 correct? 14:33:23</p> <p>11 A. Yeah, it looks like that. Yes. 14:33:23</p> <p>12 Q. Okay. And it says, "Hi Melania, I'm 14:33:25</p> <p>13 looping in Eric D, who runs our hotel company." 14:33:28</p> <p>14 And is that Mr. Danziger? 14:33:31</p> <p>15 A. My -- I would think so, yes. Yes, 14:33:33</p> <p>16 Mr. Danziger runs our hotel company. 14:33:37</p> <p>17 Q. So you say, "[W]e -- For the inaugura ion 14:33:40</p> <p>18 we currently have an 800-person wait list for rooms 14:33:43</p> <p>19 with an eight --" or excuse me, "-- a five-night 14:33:46</p> <p>20 minimum." 14:33:49</p> <p>21 Do you recall having a wait list hat long 14:33:49</p> <p>22 for rooms? 14:33:53</p>
127	<p>1 arrange that for someone. So I -- I don't recall 14:30:54</p> <p>2 specific for his hotel, but I -- I do in the past. 14:30:56</p> <p>3 BY MS. JONES: 14:30:59</p> <p>4 Q. For -- for other Trump hotels, you're 14:30:59</p> <p>5 talking? 14:31:03</p> <p>6 A. Well, you know, if somebody asked me, I'll 14:31:04</p> <p>7 connect them to the point of contact that I have at, 14:31:07</p> <p>8 at that property. 14:31:10</p> <p>9 Q. How often was Mr. Danziger updating you on 14:31:24</p> <p>10 the hotel room availability at the Trump Hotel during 14:31:28</p> <p>11 the lead-up to the inauguration week? 14:31:32</p> <p>12 A. I don't recall if he was. 14:31:37</p> <p>13 Q. Do you recall he -- the circumstances of 14:31:42</p> <p>14 the hotel stay, like that there was a five-night 14:31:46</p> <p>15 minimum? Do you recall those things? 14:31:50</p> <p>16 A. I do not. 14:31:52</p> <p>17 MS. JONES: Leo, can you put tab 13 in, 14:32:12</p> <p>18 please. 14:32:14</p> <p>19 MS. WOODS: You can run over here. 14:32:48</p> <p>20 (Deposition Exhibit Number 61 was marked 14:32:14</p> <p>21 for identification and attached to the transcript.) 14:32:32</p> <p>22 MS. JONES: Okay, it should be in here 14:32:32</p>	129	<p>1 A. No, I don't recall that specifically. But 14:33:54</p> <p>2 it was, it was a crazy time. There was a lot of 14:33:57</p> <p>3 people coming down to D.C. for the inauguration, so 14:34:01</p> <p>4 that wouldn't surprise me. 14:34:03</p> <p>5 Q. Do you recall having conversations with 14:34:04</p> <p>6 Mr. Danziger about the wait list and he -- 14:34:07</p> <p>7 A. I don't. 14:34:14</p> <p>8 Q. You hen say, "As we are about to start 14:34:15</p> <p>9 assigning rooms to people on the list I want to 14:34:17</p> <p>10 ensure that you and your family are covered." 14:34:19</p> <p>11 Were you helping in making decisions of 14:34:25</p> <p>12 who would be assigned to rooms? 14:34:27</p> <p>13 A. I wasn't. But I think, like I'm saying 14:34:29</p> <p>14 here, I wanted to make sure that there was a room 14:34:32</p> <p>15 available for them, if they were going to need it, 14:34:36</p> <p>16 because it was going to be a busy time in Washington. 14:34:39</p> <p>17 Q. And then you tell her to let Eric know 14:34:45</p> <p>18 if -- if she needs rooms, right? 14:34:48</p> <p>19 A. Correct. 14:34:51</p> <p>20 Q. Okay. So then if you'll go to the next 14:34:52</p> <p>21 one up from hat, which is on the first page of this 14:34:56</p> <p>22 document, and that one is on November 22nd, 2016, at 14:34:59</p>

<p style="text-align: right;">130</p> <p>1 1:45, and it's, again, from your e-mail, is that 14:35:07</p> <p>2 right? 14:35:10</p> <p>3 <b>A. It's -- yep.</b> 14:35:10</p> <p>4 Q. Your e-mail account, okay. 14:35:12</p> <p>5 That first sentence, you say, "Between us 14:35:14</p> <p>6 aside from family there probably won't be rooms to 14:35:20</p> <p>7 allocate unless very imp --" does that mean 14:35:22</p> <p>8 "important"? 14:35:27</p> <p>9 <b>A. Yes.</b> 14:35:27</p> <p>10 Q. Okay. "-- important as the cost is huge 14:35:29</p> <p>11 for every room we assign." 14:35:32</p> <p>12 What did you mean by that? 14:35:34</p> <p>13 <b>A. I think simply that it would be a very 14:35:36</b></p> <p>14 full hotel and if it was -- and "very important" 14:35:41</p> <p>15 would likely mean somebody like a father or mother or 14:35:46</p> <p>16 family member who she wanted to ensure would, had a 14:35:49</p> <p>17 room at that hotel. 14:35:54</p> <p>18 Q. What did you mean by " he cost is huge for 14:35:56</p> <p>19 every room we assign"? 14:36:00</p> <p>20 <b>A. Well, I think quite literally it -- the -- 14:36:03</b></p> <p>21 it was a high-demand weekend. 14:36:08</p> <p>22 Q. So does this indicate to you that you were 14:36:12</p>	<p style="text-align: right;">132</p> <p>1 Q. So were you, were you paying for them 14:37:20</p> <p>2 somehow? 14:37:25</p> <p>3 <b>A. Well, I said "if you have any staff." So 14:37:27</b></p> <p>4 presumably somebody would be paying, you know, either 14:37:30</p> <p>5 that the per staff team, people who she's friends, 14:37:33</p> <p>6 anyone, depending on what their -- their needs were. 14:37:39</p> <p>7 Q. You said, "I am doing that for Alexa." 14:37:48</p> <p>8 Who is Alexa? 14:37:51</p> <p>9 <b>A. Alexa is a friend of mine.</b> 14:37:53</p> <p>10 Q. And did you book her in a different hotel? 14:37:56</p> <p>11 <b>A. I believe she stayed in -- yes. She 14:38:00</b></p> <p>12 stayed in a different hotel, yeah. 14:38:04</p> <p>13 Q. And -- and did she pay for her own room or 14:38:08</p> <p>14 did somebody else pay for it? 14:38:11</p> <p>15 <b>A. I -- I don't know the answer. I think I 14:38:15</b></p> <p>16 paid for it. 14:38:17</p> <p>17 Q. Do you remember where you booked her? 14:38:19</p> <p>18 <b>A. I don't.</b> 14:38:27</p> <p>19 Q. If you go up to the -- the top e-mail on 14:38:33</p> <p>20 that page -- 14:38:36</p> <p>21 <b>A. Uh-huh.</b> 14:38:38</p> <p>22 Q. This one is to Melania Trump. That says 14:38:39</p>
<p style="text-align: right;">131</p> <p>1 comping the room or hat the cost would be expensive 14:36:14</p> <p>2 for the person renting the room? 14:36:16</p> <p>3 <b>A. I -- I mean it could be either.</b> 14:36:19</p> <p>4 Q. Okay. You hen say "five-day minimum 14:36:27</p> <p>5 rate," and then you said "Dad even wanted to take a 14:36:30</p> <p>6 regular room himself, rather than a suite, but I 14:36:33</p> <p>7 convinced him otherwise." 14:36:36</p> <p>8 Why, why did your dad want to take a 14:36:38</p> <p>9 regular room, instead of a suite? 14:36:40</p> <p>10 <b>A. I -- I don't recall this. I don't recall 14:36:42</b></p> <p>11 that specifically. 14:36:46</p> <p>12 Q. Do you remember trying to talk him into 14:36:49</p> <p>13 taking a suite? 14:36:51</p> <p>14 <b>A. No, I don't.</b> 14:36:53</p> <p>15 Q. You then say, "If you have any staff hat 14:36:57</p> <p>16 is coming down we can book them in a less expensive 14:37:00</p> <p>17 local hotel." 14:37:03</p> <p>18 Why would you want to book them in a less 14:37:06</p> <p>19 expensive local hotel? 14:37:08</p> <p>20 <b>A. Well, because it would be less expensive 14:37:11</b></p> <p>21 than staying at -- at this hotel, if it wasn't direct 14:37:15</p> <p>22 family. 14:37:19</p>	<p style="text-align: right;">133</p> <p>1 [REDACTED] 14:38:42</p> <p>2 Did Melania Trump work for he Trump 14:38:45</p> <p>3 Organization? 14:38:49</p> <p>4 <b>A. Not that I'm aware of, no.</b> 14:38:50</p> <p>5 Q. Do you have any idea why she has a Trump 14:38:55</p> <p>6 e-mail address? 14:39:01</p> <p>7 <b>A. I don't.</b> 14:39:02</p> <p>8 Q. And it's from you, is that right? 14:39:02</p> <p>9 <b>A. It is.</b> 14:39:04</p> <p>10 Q. Okay. It says, you said, "You should 14:39:05</p> <p>11 prioritize and then send he ones that you really 14:39:09</p> <p>12 want to stay at the hotel to Eric. Unless they are 14:39:12</p> <p>13 family or you really want a comp he will probably 14:39:14</p> <p>14 make them pay." 14:39:17</p> <p>15 <b>A. [Nods.]</b> 14:39:23</p> <p>16 Q. Does that help refresh your recollection 14:39:23</p> <p>17 on whether or not these rooms were being comped? 14:39:25</p> <p>18 <b>A. It doesn't, no.</b> 14:39:28</p> <p>19 Q. Who is -- the next sentence says, "For 14:39:31</p> <p>20 example even for people like Phil Ruffin who --" 14:39:36</p> <p>21 excuse me. "We are having to tell them they can only 14:39:39</p> <p>22 have one room as opposed to the five they want to 14:39:42</p>

<b>134</b>		<b>136</b>	
1	book." 14:39:45	1	going for an hour. I apologize, but can we take a 14:42:40
2	Who is Phil Ruffin? 14:39:46	2	five-minute comfort break? 14:42:44
3	<b>A. He is a family friend and business 14:39:48</b>	3	THE WITNESS: Sure. 14:42:48
4	<b>partner.</b> 14:39:54	4	MS. JONES: If we can go off the record. 14:42:49
5	Q. And did you comp his room at the Trump 14:39:54	5	THE VIDEOGRAPHER: Going off the record at 14:42:51
6	Hotel? 14:39:59	6	2:42 p.m. 14:42:53
7	<b>A. I don't recall.</b> 14:39:59	7	(A break was taken.) 14:42:56
8	Q. And it says you're telling him he can only 14:40:00	8	THE VIDEOGRAPHER: Back on the record at 14:59:09
9	have one as opposed to the five he wanted. 14:40:09	9	2:58 p.m. 14:59:10
10	How did you know he wanted five rooms? 14:40:12	10	BY MS. JONES: 14:59:14
11	<b>A. Likely he or Eric or somebody told me.</b> 14:40:13	11	Q. Ms. Trump, let me just ask, go back and 14:59:24
12	Q. Do you know how you made the decision to 14:40:17	12	ask you a few follow-up questions. 14:59:26
13	only give him one room? 14:40:22	13	Did you have a room reserved for you at 14:59:29
14	<b>A. I, I, I'm not sure that I made that 14:40:24</b>	14	the Marriott? 14:59:33
15	<b>decision.</b> 14:40:27	15	Let me just get this document. 14:59:42
16	Q. Do you know who did? 14:40:27	16	<b>A. It's possible there, there was a room 14:59:46</b>
17	MS. WOODS: Objection, foundation. 14:40:37	17	<b>reserved for me there. I don't know, was that the 14:59:48</b>
18	THE WITNESS: I, I don't know. 14:40:38	18	<b>site of one of the -- could you give me some context 14:59:52</b>
19	BY MS. JONES: 14:40:39	19	<b>as to why? It may help me remember.</b> 14:59:56
20	Q. Let me ask you his. If he was paying for 14:40:40	20	MS. JONES: Sure. Let me -- I'm pulling 14:59:59
21	the rooms himself, why would it matter if -- if he 14:40:41	21	up a document here. So why don't you, Leo, can you 15:00:01
22	had one room or five, do you know? 14:40:44	22	put tab 14 into the file. It's an Excel worksheet 15:00:22
<b>135</b>		<b>137</b>	
1	<b>A. I could take a guess. But no, I, I would 14:40:48</b>	1	and this will be -- I believe we're at 62. 15:00:55
2	<b>think that a lot of people wanted rooms, so there -- 14:40:54</b>	2	(Deposition Exhibit Number 62 was marked 15:01:10
3	<b>it was managing different people who -- who wanted 14:40:57</b>	3	for identification and attached to the transcript.) 15:01:11
4	<b>rooms. So may -- I would guess that would be the 14:41:02</b>	4	BY MS. JONES: 15:01:11
5	<b>reason, but I don't know.</b> 14:41:05	5	Q. So -- do you have that open? 15:01:12
6	Q. If we -- 14:41:05	6	<b>A. I do.</b> 15:01:13
7	<b>A. This location is right on Pennsylvania 14:41:23</b>	7	Q. Okay. This isn't your document but I just 15:01:13
8	<b>Avenue, so it was right on that parade route, so, you 14:41:24</b>	8	want to show you, if you click on the -- this is an 15:01:15
9	<b>know, it was a great location to stay in.</b> 14:41:27	9	Excel spreadsheet and if you click on the tabs at the 15:01:18
10	Q. At some point in, in this process of 14:41:32	10	bottom where it says "Hotel." 15:01:20
11	reserving hotel rooms, did you direct Mr. Danziger to 14:41:46	11	<b>A. Yep.</b> 15:01:22
12	take control of he reservations away from the hotel? 14:41:52	12	Q. Right. And then on -- I'm showing line 15:01:23
13	<b>A. I don't recall that.</b> 14:42:00	13	16, and it -- well, here, let me, first at the top, 15:01:33
14	Q. So you talked about, you know, making sure 14:42:03	14	do you see across the top, it says "who pays, base 15:01:36
15	Mrs. Trump, Melania Trump, had rooms set aside. 14:42:10	15	rates, status, group rates, requester and hotel"? 15:01:39
16	You're -- it looks like you're coordinating with 14:42:16	16	<b>A. Okay.</b> 15:01:39
17	maybe numerous people to make sure they had rooms. 14:42:18	17	Q. And if you scroll down, at tab 16, on the 15:01:39
18	Who -- who was the point of contact to make sure that 14:42:20	18	who pay, it says "PIC." And then for the group name, 15:01:44
19	the people who needed rooms had the room? 14:42:24	19	it says "Ivanka Trump." Do you see where I am? 15:01:51
20	<b>A. Well, my point of contact was Eric 14:42:27</b>	20	<b>A. I do.</b> 15:01:53
21	<b>Danziger.</b> 14:42:30	21	Q. And then it says the requester is Cassidy 15:01:54
22	MS. JONES: Okay. I know we've only been 14:42:34	22	Dumbauld. 15:01:59

<b>138</b>		<b>140</b>			
1	A. Uh-huh.	15:02:00	1	<b>changed from earlier that day from the inauguration</b>	15:03:55
2	Q. Do you know who that is?	15:02:00	2	<b>itself and the parade.</b>	15:03:57
3	A. Yeah. She worked on transition. She	15:02:02	3	Q. Okay. But you think that that happened at	15:04:00
4	<b>worked on the campaign.</b>	15:02:05	4	the White House or somewhere else?	15:04:01
5	Q. Okay.	15:02:06	5	A. Correct.	15:04:04
6	A. Part of the transition.	15:02:07	6	Q. There was a block of rooms reserved at the	15:04:04
7	Q. Transition team?	15:02:08	7	Loews Madison hotel for Trump Organization people.	15:04:16
8	And then it says that it's at the	15:02:09	8	Do you know anything about that?	15:04:22
9	"Marriott Marquis, one Presidential Suite, Only for	15:02:10	9	A. I do not, no.	15:04:23
10	Jan 20th."	15:02:15	10	MS. WOODS: Objection, foundation.	15:04:26
11	Does that refresh your recollection? Do	15:02:19	11	BY MS. JONES:	15:04:27
12	you know why you would have had that room there? Or	15:02:21	12	Q. Do you know who Gentry Beech is?	15:04:28
13	did you have that room there?	15:02:23	13	A. I -- he was a friend of my brother's, or	15:04:31
14	A. I -- I don't know. I don't -- I didn't	15:02:25	14	<b>is a friend of my brother's.</b>	15:04:35
15	<b>stay that.</b>	15:02:34	15	Q. Do you know if he worked on the campaign?	15:04:37
16	Q. Okay.	15:02:34	16	A. I do not.	15:04:42
17	A. You know, there was -- this was on a	15:02:35	17	Q. Let me ask, which, which brother?	15:04:44
18	<b>Friday night?</b>	15:02:36	18	A. Don.	15:04:47
19	Q. Yes.	15:02:36	19	Q. Okay. Do you know if he worked on the	15:04:48
20	A. Yeah. There was -- I remember a lot of, a	15:02:37	20	<b>transition team?</b>	15:04:52
21	<b>lot of the logistics I was dealing with on that</b>	15:02:41	21	A. I do not.	15:04:54
22	<b>particular day was how to get places because of the</b>	15:02:43	22	Q. Do you know if he worked on the	15:04:55
<b>139</b>		<b>141</b>			
1	<b>Sabbath starting so early, which I observe, which</b>	15:02:47	1	inauguration?	15:04:56
2	<b>started, around that time of year, it probably would</b>	15:02:51	2	A. I do not.	15:04:58
3	<b>have started at 4:30 in the afternoon. So maybe,</b>	15:02:54	3	Q. Did you stay at the Loews Madison Hotel?	15:05:00
4	<b>maybe that was a place potentially that I could have</b>	15:02:59	4	A. No.	15:05:04
5	<b>changed. Maybe it was where one of the balls was</b>	15:03:02	5	Q. Do you know of anyone who did?	15:05:06
6	<b>where I could change into a dress. Like I remember a</b>	15:03:05	6	A. I can't recall if any, if anyone I knew	15:05:10
7	<b>lot of my questions around timing were just how to,</b>	15:03:07	7	<b>did.</b>	15:05:12
8	<b>how to manage that around sundown.</b>	15:03:10	8	Q. Okay. Did Gentry Beech work for the Trump	15:05:13
9	Q. Okay. So do you recall going to hotel	15:03:14	9	<b>Organization?</b>	15:05:21
10	rooms to change, like ball gowns or dresses during	15:03:19	10	A. No.	15:05:22
11	the balls?	15:03:23	11	Q. He was just a friend of your brother?	15:05:22
12	A. I -- I don't believe that I did. I think	15:03:24	12	A. Well, he may have been. As I said -- as	15:05:26
13	<b>I ended up doing that at the White House, where the</b>	15:03:26	13	<b>you noted, he may have been involved in other things</b>	15:05:29
14	<b>family was staying.</b>	15:03:29	14	<b>as -- as it related to this, but I don't know that.</b>	15:05:31
15	Q. Okay. Did you stay --	15:03:30	15	Q. Okay.	15:05:34
16	A. At this time -- yeah, if it was after the	15:03:33	16	A. I know him as a friend of my brother's.	15:05:34
17	<b>inauguration, we went, we stayed as a family at the</b>	15:03:35	17	Q. Okay. You mentioned that you did attend	15:05:37
18	<b>White House. Before the inauguration, we stayed as a</b>	15:03:38	18	<b>the parade. Did you -- did you walk in the parade?</b>	15:05:52
19	<b>family at Blair House.</b>	15:03:40	19	A. No. We walked on the way from the Capitol	15:05:58
20	Q. Okay. Did you stay in the same dress all	15:03:41	20	<b>Building to the White House. At one point, the cars</b>	15:06:09
21	night or did you have to change?	15:03:47	21	<b>stopped and everyone walked a couple of blocks, got</b>	15:06:16
22	A. No, I stayed in the same dress. But I	15:03:49	22	<b>back into the cars and then went to the White House.</b>	15:06:19



142	<p>1 <b>And subsequent to that there was, we all watched a</b> 15:06:22</p> <p>2 <b>parade from -- from the South Lawn.</b> 15:06:26</p> <p>3 Q. Oh, okay. You watched it from the South 15:06:33</p> <p>4 Lawn, like it went past, you could see it? 15:06:36</p> <p>5 <b>A. Wherever we -- they had a tent set up</b> 15:06:39</p> <p>6 <b>for -- for the president and for family and there was</b> 15:06:43</p> <p>7 <b>the parade. This was prior to -- this was prior to</b> 15:06:47</p> <p>8 <b>changing and leaving for the -- to attend the</b> 15:06:52</p> <p>9 <b>Inaugural Ball.</b> 15:06:56</p> <p>10 Q. So was that -- I'm sorry, was that you 15:06:57</p> <p>11 were watching it, like, on -- on TV screens or live? 15:07:00</p> <p>12 <b>A. No, no, no. We were watching it on -- on</b> 15:07:03</p> <p>13 <b>bleachers, we were watching it on -- not bleachers,</b> 15:07:05</p> <p>14 <b>it was like a tent.</b> 15:07:08</p> <p>15 Q. Okay. But you could see the live parade 15:07:10</p> <p>16 happening? 15:07:12</p> <p>17 <b>A. Correct.</b> 15:07:13</p> <p>18 Q. Okay. And who all was there with you? 15:07:15</p> <p>19 Were your brothers there? 15:07:20</p> <p>20 <b>A. My brothers were there. My father was</b> 15:07:22</p> <p>21 <b>there. Melania was there. And then some other</b> 15:07:25</p> <p>22 <b>family members.</b> 15:07:32</p>
143	<p>1 Q. All right. Was Tommy Hicks, Jr., here 15:07:34</p> <p>2 with you all? 15:07:36</p> <p>3 <b>A. I don't recall seeing him.</b> 15:07:37</p> <p>4 Q. You said you watched for a bit, I think 15:07:42</p> <p>5 you said that you were also in cars. Did you drive 15:07:46</p> <p>6 the parade route for part of it? 15:07:48</p> <p>7 <b>A. Well, we drove from the Capitol Building</b> 15:07:50</p> <p>8 <b>to the White House, which is down Pennsylvania</b> 15:07:53</p> <p>9 <b>Avenue. So there was a portion where we were driving</b> 15:07:58</p> <p>10 <b>through it, yes.</b> 15:08:00</p> <p>11 Q. Okay, I see. 15:08:01</p> <p>12 And how -- who was in the vehicle with 15:08:03</p> <p>13 you? Do you remember? 15:08:06</p> <p>14 <b>A. Jared, my husband, and -- and my three</b> 15:08:12</p> <p>15 <b>children.</b> 15:08:15</p> <p>16 Q. All right. 15:08:15</p> <p>17 <b>A. Who were tired and cranky at that point, I</b> 15:08:19</p> <p>18 <b>remember that. It was cold. It was a great day, but</b> 15:08:23</p> <p>19 <b>for the little one, it was, it was a lot.</b> 15:08:32</p> <p>20 Q. Who is Lindsay Santoro? 15:08:41</p> <p>21 <b>A. She was my brother Don's assistant. I</b> 15:08:43</p> <p>22 <b>don't, I don't know if she was during this period of</b> 15:08:48</p>
144	<p>1 <b>time, but, at some point in time, she was.</b> 15:08:50</p> <p>2 MS. JONES: Could you -- Leo, could you 15:09:29</p> <p>3 put -- I'm sorry, I lost my page here. Tab 5, could 15:09:33</p> <p>4 you put tab 5. 15:09:49</p> <p>5 (Deposition Exhibit Number 63 was marked 15:10:02</p> <p>6 for identification and attached to the transcript.) 15:10:07</p> <p>7 MS. JONES: I see it, if you can hit 15:10:07</p> <p>8 refresh. And this will now be 63, I believe. 15:10:10</p> <p>9 Do you have it? 15:10:26</p> <p>10 THE WITNESS: I do. 15:10:33</p> <p>11 BY MS. JONES: 15:10:34</p> <p>12 Q. So you said -- you're not, you're not on 15:10:37</p> <p>13 this e-mail, but you see that the e-mail is from 15:10:40</p> <p>14 Heather Martin? Do you know who Heather Martin is? 15:10:46</p> <p>15 <b>A. I don't.</b> 15:10:48</p> <p>16 Q. And she sent this e-mail to Allen 15:10:49</p> <p>17 Weisselberg, and he's an executive at the Trump 15:10:52</p> <p>18 Organization, correct? 15:10:55</p> <p>19 <b>A. Correct.</b> 15:10:56</p> <p>20 Q. He's the one we talked about earlier. So 15:10:58</p> <p>21 this e-mail, it says, "Hi Allen, attached is the 15:11:00</p> <p>22 detail that makes up the cover page, not super pretty 15:11:13</p>
145	<p>1 as this is my daily working document, but I believe 15:11:17</p> <p>2 this might give you a clearer picture of the data you 15:11:20</p> <p>3 want." 15:11:22</p> <p>4 Let me see. I'm sorry, can you go down to 15:11:25</p> <p>5 the next e-mail? It's dated May 5th, 2017, and it 15:11:32</p> <p>6 says -- and that one's from Allen to Heather, and 15:11:36</p> <p>7 Allen says, "Thank you for the attached. What is the 15:11:40</p> <p>8 actual date of the PIC revenue report?" 15:11:42</p> <p>9 Do you have any idea why the Trump 15:11:46</p> <p>10 Organization would be asking for revenue data from 15:11:48</p> <p>11 the PIC? 15:11:50</p> <p>12 <b>A. I do not.</b> 15:11:51</p> <p>13 Q. And, again, do you know what 15:11:53</p> <p>14 Mr. Weisselberg's role at the Trump Organization is 15:12:01</p> <p>15 other than an executive? 15:12:05</p> <p>16 <b>A. Well, I know he's an executive vice</b> 15:12:06</p> <p>17 <b>president. So that's his -- I don't know what his</b> 15:12:10</p> <p>18 <b>specific title is, though.</b> 15:12:13</p> <p>19 Q. What's his role? Like, what -- do you 15:12:15</p> <p>20 know what he does for the Trump Organization back in 15:12:17</p> <p>21 the 2017? 15:12:22</p> <p>22 <b>A. Yeah. He's involved with financials, he's</b> 15:12:23</p>

146	<p>1 involved generally as a -- as somebody that we've 15:12:29</p> <p>2 known for a very long time and worked in the business 15:12:33</p> <p>3 for a very long time. So he's involved in several 15:12:36</p> <p>4 things, but, but -- but as a, in a CFO capacity, as 15:12:41</p> <p>5 well. 15:12:47</p> <p>6 Q. Oh, as -- okay. Okay. 15:12:48</p> <p>7 Are you aware that the PIC reserved event 15:12:53</p> <p>8 space at the Trump Hotel for inauguration week? 15:13:05</p> <p>9 A. I was not aware prior to these 15:13:08</p> <p>10 discussions. 15:13:16</p> <p>11 MS. JONES: Can you put tab 4 in the 15:13:23</p> <p>12 folder. And his will be Exhibit 36, previously 15:13:27</p> <p>13 marked. Let me know when you have it. 15:13:36</p> <p>14 THE WITNESS: I've got it, thank you. 15:14:06</p> <p>15 (Deposition Exhibit Number 36 was 15:14:06</p> <p>16 previously marked for identification and attached to 15:14:06</p> <p>17 the transcript.) 15:14:20</p> <p>18 BY MS. JONES: 15:14:20</p> <p>19 Q. When you're ready, we'll start with the 15:14:20</p> <p>20 first e-mail, second to the last page, and it's from 15:14:23</p> <p>21 Patricia Tang to Ramsey Ratcliffe, dated 10th, 2016, 15:14:25</p> <p>22 at 10:07 p.m. Let me know when you're ready. 15:14:32</p>	148	<p>1 Q. "-- the price is \$3.6 million." 15:15:35</p> <p>2 Do you see that? 15:15:38</p> <p>3 A. I do. 15:15:39</p> <p>4 Q. And then the e-mail above that, Ramsey 15:15:41</p> <p>5 Ratcliffe forwards that on to some people. And then 15:15:45</p> <p>6 the e-mail I want to talk to you about, it starts on 15:15:49</p> <p>7 page three, it's the next one up, though. It's from 15:15:53</p> <p>8 Rick Gates. Do you see where I am? 15:15:59</p> <p>9 A. I do. 15:16:00</p> <p>10 Q. Monday, December 12th at 8:21 p.m.? 15:16:01</p> <p>11 A. Got it. 15:16:05</p> <p>12 Q. Okay. And Mr. Gates is writing you at 15:16:05</p> <p>13 your trumporg.com e-mail address, right? 15:16:08</p> <p>14 A. I see that, yes. 15:16:12</p> <p>15 Q. Okay. And he forwards this e-mail to you 15:16:14</p> <p>16 and says that he wants "to pass along the below 15:16:16</p> <p>17 information in hopes that you can provide some help. 15:16:20</p> <p>18 Stephanie's plans for several of our inaugural events 15:16:23</p> <p>19 incorporate the use of the OPO ballroom." 15:16:26</p> <p>20 Do you understand "OPO" to be the Old Post 15:16:30</p> <p>21 Office? 15:16:31</p> <p>22 A. I do. 15:16:32</p>
147	<p>1 A. I got it. 15:14:36</p> <p>2 Q. Do you know who Ramsey Ratcliffe is? 15:14:37</p> <p>3 A. I do not. 15:14:39</p> <p>4 Q. And do you know who Patricia Tang is at 15:14:49</p> <p>5 the Trump Hotel? 15:14:52</p> <p>6 A. I do not. 15:14:54</p> <p>7 I'm laughing because I have her name on my 15:14:54</p> <p>8 screen under my head right now. 15:14:57</p> <p>9 Q. That e-mail from Ms. Tang, that is the 15:14:59</p> <p>10 trump-hotels.com, is an e-mail addressed that's used 15:15:03</p> <p>11 at the Trump Hotel? 15:15:05</p> <p>12 A. I -- I think that was the address that our 15:15:07</p> <p>13 hotels' properties used, yes. 15:15:11</p> <p>14 Q. Okay. You see the body of that e-mail -- 15:15:15</p> <p>15 and I know you're not on this e-mail, so I'll read 15:15:17</p> <p>16 this to you just for context, but where it's from 15:15:19</p> <p>17 Ms. Tang to Ms. Ratcliffe and it says, "For eight 15:15:21</p> <p>18 days, Sunday through Sunday, for all space including 15:15:26</p> <p>19 room rental and a minimum F&amp;B --" 15:15:29</p> <p>20 Do you understand that to be food and 15:15:33</p> <p>21 beverage? 15:15:34</p> <p>22 A. I do. 15:15:35</p>	149	<p>1 Q. And that's the Trump Hotel in D.C.? 15:16:33</p> <p>2 A. Yes. 15:16:36</p> <p>3 Q. "However we both have two concerns with 15:16:38</p> <p>4 the email below. First, the cost itself seems quite 15:16:40</p> <p>5 high compared to other property buyouts for the week. 15:16:44</p> <p>6 Second, I'm a bit worried about the optics of the PIC 15:16:47</p> <p>7 paying the Trump Hotel a high fee and the media 15:16:49</p> <p>8 making a big story out of it. Let me know if you 15:16:52</p> <p>9 have thoughts and if we can discuss the best path 15:16:55</p> <p>10 forward." 15:16:58</p> <p>11 Do you recall Mr. Gates reaching out to 15:16:58</p> <p>12 you with this concern? 15:17:00</p> <p>13 A. I recall, yes. So in I guess his capacity 15:17:02</p> <p>14 you said as part of the PIC, I recall them asking me 15:17:07</p> <p>15 about using the hotel and me passing it along to 15:17:13</p> <p>16 Mickael. 15:17:19</p> <p>17 Q. Okay. And here, he seems to have concerns 15:17:20</p> <p>18 with the price of the hotel. Do you see that? 15:17:21</p> <p>19 A. I do. 15:17:24</p> <p>20 Q. Okay. And do you recall having a 15:17:26</p> <p>21 conversation with Mickael about the price of the 15:17:29</p> <p>22 hotel? 15:17:31</p>

150	<p>1 A. I do not. 15:17:32</p> <p>2 Q. Do you recall -- 15:17:35</p> <p>3 A. I recall -- oh, sorry, go ahead. 15:17:37</p> <p>4 Q. No, no, please. 15:17:39</p> <p>5 A. No. I only record -- recall forwarding 15:17:40</p> <p>6 him this e-mail. 15:17:43</p> <p>7 Q. Okay. So in the e-mail above, he one we 15:17:44</p> <p>8 just read, this is on December 12th at 10:13 p.m. 15:17:51</p> <p>9 from Ivanka Trump, that's from your e-mail account, 15:17:55</p> <p>10 right? 15:17:59</p> <p>11 A. It is, yes. 15:18:00</p> <p>12 Q. And it says, "Can you confirm this is fair 15:18:02</p> <p>13 market price? Seems high but if in line with market 15:18:05</p> <p>14 I will tell them." 15:18:08</p> <p>15 Do you see that? 15:18:09</p> <p>16 A. I do. 15:18:10</p> <p>17 Q. What -- what did you mean by "fair market 15:18:11</p> <p>18 price"? 15:18:16</p> <p>19 A. Meaning a fair, a fair price to charge, 15:18:19</p> <p>20 consistent with what the market dictates, not higher 15:18:22</p> <p>21 or lower than what the market would command for this 15:18:27</p> <p>22 event. 15:18:31</p>
151	<p>1 Q. And -- and why is a fair market price 15:18:32</p> <p>2 important in this context? 15:18:35</p> <p>3 A. Well, I thought it was important clearly 15:18:37</p> <p>4 not to -- not to charge them more or -- or less than 15:18:42</p> <p>5 the space would have otherwise rented for. 15:18:47</p> <p>6 Q. And is that the case with all 15:18:51</p> <p>7 organizations, hat you try and give fair market, 15:18:52</p> <p>8 that it's important to give fair market price for 15:18:55</p> <p>9 anyone who rents the hotel? 15:18:57</p> <p>10 A. Well, I think it depends on -- on the 15:19:01</p> <p>11 circumstance, of course, but -- but yes. I mean, 15:19:03</p> <p>12 our -- our hotel team decides what is, what is an 15:19:06</p> <p>13 appropriate market price, based on any number of 15:19:09</p> <p>14 circumstances. 15:19:11</p> <p>15 Q. So if they gave an initial price of 3.6 15:19:14</p> <p>16 million, do you have reason to believe that that 15:19:18</p> <p>17 wasn't a fair market price? 15:19:19</p> <p>18 A. I -- I don't. That's why I said if it is 15:19:22</p> <p>19 a fair market price. He said that it seemed high. 15:19:25</p> <p>20 But -- but I said if it's a fair market price, I'll 15:19:31</p> <p>21 let them know. 15:19:34</p> <p>22 Q. Okay. You also said it seemed high. What 15:19:35</p>
152	<p>1 were you basing that on? 15:19:38</p> <p>2 A. I think the fact that he said it was high 15:19:41</p> <p>3 relative to the comparables, or seemed high relative 15:19:43</p> <p>4 to the comparables. 15:19:48</p> <p>5 Q. Okay. 15:19:51</p> <p>6 A. Clearly I didn't know because I asked him 15:19:52</p> <p>7 to tell me either way. 15:19:53</p> <p>8 Q. Okay. So if you, if you go up to the next 15:19:55</p> <p>9 e-mail, which is on page two, and this is from 15:19:58</p> <p>10 Michael Damelincourt at trumphotels.com to you on 15:20:02</p> <p>11 December 13th at 12:13 a.m. Do you see that? 15:20:05</p> <p>12 A. I do. 15:20:09</p> <p>13 Q. And here, Mr. Damelincourt says to you 15:20:12</p> <p>14 "This is the food and beverage and room rental 15:20:19</p> <p>15 minimum for each room during that period as per our 15:20:22</p> <p>16 sales guidelines." 15:20:22</p> <p>17 Do you know what his sales guidelines are? 15:20:24</p> <p>18 Do you know -- 15:20:29</p> <p>19 A. The parameters of pricing rooms? I don't 15:20:30</p> <p>20 know. What it says, a sales guideline. 15:20:32</p> <p>21 Q. But are you familiar with the sales 15:20:36</p> <p>22 guidelines? 15:20:38</p>
153	<p>1 A. No. 15:20:39</p> <p>2 Q. Then he says, "The chance to get this from 15:20:41</p> <p>3 anyone is second to none. In all situations we would 15:20:43</p> <p>4 have to negotiate. I would be fine with anyone 15:20:46</p> <p>5 offering us 50 percent of the 3.6 million quoted by 15:20:49</p> <p>6 the team 1.8 million." 15:20:52</p> <p>7 And then if you see the e-mail above, it's 15:20:55</p> <p>8 you responding to him and you said, "Why don't you 15:20:57</p> <p>9 call and negotiate. It should be fair market rate." 15:21:03</p> <p>10 Do you see that? 15:21:07</p> <p>11 A. I do. 15:21:08</p> <p>12 Q. Okay. Why are you telling him to call and 15:21:09</p> <p>13 negotiate? 15:21:11</p> <p>14 A. Well, because he said below in all 15:21:12</p> <p>15 situations we would have to negotiate. I said, Why 15:21:18</p> <p>16 don't you call and do that but it should be fair 15:21:21</p> <p>17 market rate. I mean, very literally what it says. 15:21:23</p> <p>18 Q. Do you, do you typically have to tell 15:21:26</p> <p>19 Mr. Damelincourt to negotiate with people? 15:21:29</p> <p>20 A. Well, I typically, when I'm -- when I'm 15:21:34</p> <p>21 asked a question about the pricing, I'll ask the 15:21:38</p> <p>22 person in charge of the pricing and tell them to deal 15:21:41</p>

154	<p>1 with it directly, which is, I think, what I'm doing 15:21:44</p> <p>2 here, specifying that it should be, it should be a 15:21:47</p> <p>3 fair market rate deal. 15:21:50</p> <p>4 Q. What does fair market rate mean to you? 15:22:00</p> <p>5 MS. JONES: Objection, foundation. 15:22:07</p> <p>6 THE WITNESS: Well, I think we -- we 15:22:08</p> <p>7 covered this, but it means priced in accordance with 15:22:10</p> <p>8 the product that you are selling or, in this case, 15:22:16</p> <p>9 renting. 15:22:24</p> <p>10 BY MS. JONES: 15:22:24</p> <p>11 Q. And what makes it fair? 15:22:24</p> <p>12 MS. WOODS: Objection. 15:22:27</p> <p>13 THE WITNESS: Well, the word "fair" is -- 15:22:29</p> <p>14 is -- I mean, we could literally define it from the 15:22:34</p> <p>15 dictionary, but it would be an appropriate, fair, an 15:22:38</p> <p>16 appropriate rate for the product they're selling, 15:22:43</p> <p>17 depending on the needs of the customer: What type of 15:22:46</p> <p>18 space, what time of year, uses, all these factors 15:22:51</p> <p>19 that go into pricing and then in line with the 15:22:56</p> <p>20 marketing guidelines, he market, all the other 15:23:03</p> <p>21 factors that are taken into consideration when you 15:23:07</p> <p>22 sell hotel product. 15:23:09</p>
155	<p>1 BY MS. JONES: 15:23:30</p> <p>2 Q. I'm sorry, I'm just trying to understand. 15:23:30</p> <p>3 You used the term "fair market rate" twice in talking 15:23:32</p> <p>4 to him, and just now you said that it depends on what 15:23:38</p> <p>5 the customer needs. 15:23:41</p> <p>6 I guess is there a reason you used that 15:23:46</p> <p>7 term with Mr. Damelincourt when you told him to 15:23:49</p> <p>8 negotiate a fair market rate? 15:23:51</p> <p>9 A. Well, it's -- it's a real estate term. It 15:23:55</p> <p>10 means a fair price for whatever they're getting. I 15:23:58</p> <p>11 wasn't in a position to do that because I didn't know 15:24:01</p> <p>12 what they were seeking. 15:24:04</p> <p>13 Q. Hmm. Did it cause you, did you have any 15:24:09</p> <p>14 concerns when you read Mr. -- Mr. Gates's e-mail to 15:24:15</p> <p>15 you and he said that, that one of his concerns is 15:24:19</p> <p>16 he's a bit worried about the optics of the PIC paying 15:24:22</p> <p>17 the Trump Hotel a high fee and the media making a big 15:24:25</p> <p>18 story out of it? 15:24:28</p> <p>19 A. I think what's fair is fair, and it was a 15:24:30</p> <p>20 very high-demand hotel and he should never be 15:24:37</p> <p>21 charging somebody above or -- or below what this 15:24:39</p> <p>22 brand new hotel would command otherwise. So I wasn't 15:24:43</p>
156	<p>1 thinking about that component, those weren't my 15:24:47</p> <p>2 words. 15:24:49</p> <p>3 I was, I was saying here you go, deal with 15:24:49</p> <p>4 it, and make it fair. That's, that's really, I 15:24:52</p> <p>5 viewed this as a very literal thing. 15:24:58</p> <p>6 Q. Yeah. So I guess my question is did it 15:25:01</p> <p>7 cause you any concern that Mr. Gates had this concern 15:25:03</p> <p>8 about the optics of the PIC paying the Trump Hotel 15:25:06</p> <p>9 that amount of money? 15:25:11</p> <p>10 A. Well, that's why I forwarded it, to say 15:25:13</p> <p>11 charge a fair rate. He's saying or highlighting a 15:25:18</p> <p>12 concern that it may be higher. He's not a hotel 15:25:22</p> <p>13 expert, I don't do room pricing. Make sure it's 15:25:24</p> <p>14 fair. 15:25:29</p> <p>15 MS. JONES: Leo, can you put tab two in 15:25:32</p> <p>16 the -- in he folder. Tab 2 has previously been 15:25:34</p> <p>17 marked as Exhibit 9. 15:25:48</p> <p>18 (Deposition Exhibit Number 9 was 15:25:59</p> <p>19 previously marked for identification and attached to 15:25:59</p> <p>20 the transcript.) 15:25:59</p> <p>21 BY MS. JONES: 15:25:59</p> <p>22 Q. Before we look at that, do you know why 15:26:00</p>
157	<p>1 Mr. Gates would have reached out to you about the 15:26:02</p> <p>2 pricing of the hotel? 15:26:03</p> <p>3 A. I think because he knew that I had 15:26:05</p> <p>4 overseen the construction of it and the acquisition 15:26:08</p> <p>5 of it, so he wanted to flag this for me, which I 15:26:11</p> <p>6 passed it along to somebody who -- who would have 15:26:17</p> <p>7 knowledge. I'm not sure if he -- I don't know if he 15:26:19</p> <p>8 knew Mickael, the general manager, at this point. 15:26:22</p> <p>9 Q. Do you have the next exhibit open? Okay, 15:26:38</p> <p>10 and that's Exhibit 9. So if you -- if you review 15:26:44</p> <p>11 this, you'll see that down at the bottom, 15:26:47</p> <p>12 Mr. Damelincourt has said -- sent Mr. Gates a new 15:26:51</p> <p>13 proposal based on a conversation he had, and this 15:26:54</p> <p>14 date comes after you telling Mr. Damelincourt to 15:26:59</p> <p>15 negotiate, correct? 15:27:01</p> <p>16 A. Correct. 15:27:02</p> <p>17 Q. Okay. And then Mr. Gates forwards that on 15:27:03</p> <p>18 to Stephanie, it says, of the revised pricing. And 15:27:09</p> <p>19 then Stephanie Winston Wolkoff, on the top e-mail 15:27:13</p> <p>20 here, sends an e-mail to Rick Gates and cc's Sara 15:27:16</p> <p>21 Armstrong [REDACTED] and Ivanka Trump. 15:27:22</p> <p>22 Do you see that? 15:27:27</p>

158	<p>1 A. I do. 15:27:27</p> <p>2 Q. Okay. Stephanie says, "I wanted to follow 15:27:28</p> <p>3 up on our conversation and express my concern. There 15:27:31</p> <p>4 are events in PE's honor[...]", and I read that to 15:27:35</p> <p>5 mean "president-elect," do you agree with that? 15:27:41</p> <p>6 A. It would seem rational, yes. 15:27:44</p> <p>7 Q. Okay. 15:27:47</p> <p>8 A. This wasn't addressed to me, correct? 15:27:48</p> <p>9 Q. You're cc'd. 15:27:50</p> <p>10 A. Okay. 15:27:53</p> <p>11 Q. A courtesy copy, okay? 15:27:52</p> <p>12 And it says "[...]at his hotel and one of 15:27:53</p> <p>13 them is with and for family and close friends." 15:27:56</p> <p>14 And just to orient you, if you look down 15:28:00</p> <p>15 at the initial e-mail from Mr. Damelincourt, right in 15:28:04</p> <p>16 about the middle of it, it says "reception on Friday, 15:28:08</p> <p>17 9 p.m. to midnight for approximately 1250 people." 15:28:16</p> <p>18 A. Uh-huh. 15:28:16</p> <p>19 Q. Do you see that? 15:28:16</p> <p>20 A. I do. 15:28:17</p> <p>21 Q. I believe that that is the same Friday 15:28:18</p> <p>22 night event that I spoke to you about earlier that 15:28:20</p>
159	<p>1 you weren't aware of that was for family and friends. 15:28:22</p> <p>2 A. I don't know, I wasn't aware of that. 15:28:25</p> <p>3 Q. That's what they're referring to here. 15:28:28</p> <p>4 So she says, "Please take into consideration that 15:28:30</p> <p>5 when this is audited, it will become public knowledge 15:28:33</p> <p>6 that locations were also gifted and costs 15:28:36</p> <p>7 underwritten to lower rental fees. I understand that 15:28:40</p> <p>8 compared to the original price, this is great, but we 15:28:43</p> <p>9 should look at the whole context. In my opinion, the 15:28:45</p> <p>10 max rental fee should be \$85,000 per day." 15:28:48</p> <p>11 Do you remember getting this e-mail from 15:28:52</p> <p>12 Ms. Winston Wolkoff? 15:28:53</p> <p>13 A. I do not. 15:28:54</p> <p>14 Q. If you had gotten this e-mail, would this 15:28:56</p> <p>15 have caused you concern? 15:29:00</p> <p>16 A. I think I would have done the same thing, 15:29:02</p> <p>17 I -- I would have forwarded it to Mickael and asked 15:29:08</p> <p>18 him if he agreed or not and to handle it. 15:29:12</p> <p>19 Q. So we discussed Ms. Winston Wolkoff 15:29:16</p> <p>20 earlier and her expertise in event planning, right? 15:29:19</p> <p>21 A. Correct. 15:29:23</p> <p>22 Q. Would -- do you give Ms. Wolkoff, Winston 15:29:24</p>
160	<p>1 Wolkoff any deference to what she says he maximum 15:29:29</p> <p>2 fee should be for an event like this? 15:29:32</p> <p>3 A. This maximum fee could, in -- how I would 15:29:35</p> <p>4 read it is that this is her budget, not necessarily 15:29:40</p> <p>5 what the space commands. 15:29:42</p> <p>6 Q. Even though she's talking about the fact 15:29:47</p> <p>7 that it's an event at your father's hotel and that it 15:29:49</p> <p>8 will be audited, that doesn't cause you any alarm? 15:29:53</p> <p>9 A. I -- I expect everything. We're very 15:30:00</p> <p>10 transparent. It should be fair, it should be 15:30:03</p> <p>11 appropriate. We -- I have, I have no reason to be 15:30:05</p> <p>12 concerned about an audit. 15:30:08</p> <p>13 You know, I said make sure whatever rate 15:30:11</p> <p>14 is charged is a fair, appropriate rate, so -- 15:30:15</p> <p>15 Q. What do you know about hotels and how they 15:30:27</p> <p>16 rent out event space? 15:30:33</p> <p>17 A. It's incredibly varied, depending on even 15:30:38</p> <p>18 the hotel. 15:30:41</p> <p>19 Q. And are you familiar with a practice in 15:30:43</p> <p>20 the hotel industry to comp event space, if the 15:30:46</p> <p>21 organization is bringing in customers for, like, a 15:30:53</p> <p>22 party or a room block or something like that? Is 15:30:56</p>
161	<p>1 that familiar to you? 15:31:00</p> <p>2 MS. WOODS: Objection, foundation. 15:31:01</p> <p>3 THE WITNESS: I think that's a 15:31:03</p> <p>4 hypothetical. I mean, you have big hotels, small 15:31:04</p> <p>5 hotels, luxury hotels, non-luxury hotels, hotels 15:31:07</p> <p>6 without event space, hotels with event space. 15:31:11</p> <p>7 There's, there's no -- it's -- that's why 15:31:13</p> <p>8 we were talking before about comparables, like you 15:31:19</p> <p>9 have to, here's -- this is, that's a hard question 15:31:22</p> <p>10 to answer. 15:31:26</p> <p>11 BY MS. JONES: 15:31:27</p> <p>12 Q. Well, have you ever heard of the Trump 15:31:27</p> <p>13 Hotel, any of the Trump Hotels comping event space 15:31:30</p> <p>14 for organizations? 15:31:34</p> <p>15 A. I said before, I'm not involved in -- in 15:31:36</p> <p>16 sales of -- of that type of business. That's -- that 15:31:40</p> <p>17 falls under operations. 15:31:44</p> <p>18 Q. So is your answer no, that you've never 15:31:46</p> <p>19 heard of that at a Trump Hotel? 15:31:48</p> <p>20 A. I can't recall anything specifically, no. 15:31:51</p> <p>21 Q. What about, are you aware of whether or 15:31:59</p> <p>22 not any of the Trump Hotels have comped event space 15:32:01</p>

162	<p>1 for events that involved room blocks? 15:32:04</p> <p>2 <b>A. I don't know.</b> 15:32:08</p> <p>3 <b>Q. Do you know if Trump Hotels take into</b> 15:32:09</p> <p>4 <b>consideration when doing business with a non-profit,</b> 15:32:40</p> <p>5 <b>do they take that into consideration when pricing</b> 15:32:44</p> <p>6 <b>event space?</b> 15:32:46</p> <p>7 <b>A. I -- I haven't been involved in that</b> 15:32:48</p> <p>8 <b>process, so you would have to ask Eric Danziger how</b> 15:32:53</p> <p>9 <b>they do that pricing, like they -- if there are</b> 15:32:57</p> <p>10 <b>special considerations.</b> 15:33:00</p> <p>11 <b>Q. So you don't know?</b> 15:33:01</p> <p>12 <b>A. No, I don't know.</b> 15:33:03</p> <p>13 <b>MS. JONES:</b> If you can just give me one 15:33:26</p> <p>14 <b>moment, let me take a look at my outline real</b> 15:33:27</p> <p>15 <b>quick --</b> 15:33:29</p> <p>16 <b>THE WITNESS:</b> Sure. 15:33:30</p> <p>17 <b>MS. JONES:</b> -- we'll wrap up. 15:33:30</p> <p>18 <b>I'm sorry, one more second and I think</b> 15:34:27</p> <p>19 <b>we're --</b> 15:34:29</p> <p>20 <b>Okay. Okay, that's all the questions I</b> 15:34:49</p> <p>21 <b>have for you, so unless your attorneys want to ask</b> 15:35:08</p> <p>22 <b>questions or take a break before deciding that.</b> 15:35:10</p>	164	<p>1 3:35 p.m. 15:35:55</p> <p>2 <b>MS. WOODS:</b> We will read for the court 15:36:12</p> <p>3 <b>reporter. And if I can get an electronic copy,</b> 15:36:14</p> <p>4 <b>please.</b> 15:36:22</p> <p>5 (Thereupon, the deposition was concluded</p> <p>6 at 3:36 p.m., December 1, 2020, with the witness</p> <p>7 reserving the right to read and sign the transcript.)</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p>
163	<p>1 <b>MS. WOODS:</b> We have no questions. 15:35:14</p> <p>2 <b>Lee?</b> 15:35:15</p> <p>3 <b>MR. BLALACK:</b> The PIC has no questions. 15:35:16</p> <p>4 <b>Thank you, Ms. Trump.</b> 15:35:18</p> <p>5 <b>BY MS. JONES:</b> 15:35:18</p> <p>6 <b>Q. Wait. Just real quick, you said in the</b> 15:35:20</p> <p>7 <b>beginning that your attorney was Rebecca Woods and</b> 15:35:21</p> <p>8 <b>did you say Alan -- who did you say your other</b> 15:35:24</p> <p>9 <b>attorney was?</b> 15:35:27</p> <p>10 <b>A. Alan Garten. Not my attorney but a, an</b> 15:35:36</p> <p>11 <b>attorney.</b> 15:35:38</p> <p>12 <b>Q. I'm sorry, is that general counsel for the</b> 15:35:38</p> <p>13 <b>Trump Org?</b> 15:35:40</p> <p>14 <b>A. I'm not sure what his title is, but --</b> 15:35:42</p> <p>15 <b>MR. GARTEN:</b> Yep, that's it. 15:35:46</p> <p>16 <b>THE WITNESS:</b> That sounds right. Is that 15:35:48</p> <p>17 <b>it?</b> 15:35:49</p> <p>18 <b>MR. GARTEN:</b> That's right. 15:35:49</p> <p>19 <b>MS. JONES:</b> That's all I have. I 15:35:50</p> <p>20 <b>appreciate your time. I guess we can go off the</b> 15:35:52</p> <p>21 <b>record.</b> 15:35:53</p> <p>22 <b>THE VIDEOGRAPHER:</b> Going off the record at 15:35:54</p>	165	<p>1 CERTIFICATE OF SHORTHAND REPORTER - NOTARY PUBLIC</p> <p>2 I, Donna A. Peterson, the officer before</p> <p>3 whom the foregoing proceedings were taken, do hereby</p> <p>4 certify that the foregoing transcript is a true and</p> <p>5 correct record of the proceedings; that said</p> <p>6 proceedings were taken by me stenographically and</p> <p>7 therefore reduced to typewriting under my</p> <p>8 supervision; and that I am neither counsel for,</p> <p>9 related to nor employed by any of the parties to this</p> <p>10 case and have no interest, financial or otherwise, in</p> <p>11 its outcome.</p> <p>12 District of Columbia</p> <p>13 Signed and sworn to and affirmed, by Donna</p> <p>14 A. Peterson, I have hereunto set my hand and affixed</p> <p>15 my notarial seal this        day of</p> <p>16</p> <p>17 My Commission Expires January 14, 2025</p> <p>18</p> <p>19</p> <p>20 _____</p> <p>21 NOTARY PUBLIC IN AND FOR THE</p> <p>22 DISTRICT OF COLUMBIA</p>

ACKNOWLEDGMENT OF DEPONENT

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I, \_\_\_\_\_, do hereby  
acknowledge that I have read and examined the  
foregoing testimony, and the same is a true, correct  
and complete transcription of the testimony given by  
me, and any corrections appear on the attached Errata  
Sheet signed by me.

\_\_\_\_\_  
(DATE) (SIGNATURE)

NOTARIZATION (If Required)

State of \_\_\_\_\_  
County of \_\_\_\_\_  
Subscribed and sworn to (or affirmed) before me on  
this \_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_, by  
\_\_\_\_\_, proved to me on the  
basis of satisfactory evidence to be the person who  
appeared before me.  
Signature: \_\_\_\_\_  
(Seal)

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