

ZELDES & HAEGGQUIST, LLP
 AMBER L. ECK (177882)
 HELEN I. ZELDES (220051)
 ALREEN HAEGGQUIST (221858)
 625 Broadway, Suite 906
 San Diego, CA 92101
 Telephone: (619) 342-8000
 Facsimile: (619) 342-7878
 ambere@zhlaw.com
 helenz@zhlaw.com
 alreenh@zhlaw.com
 aarono@zhlaw.com

ROBBINS GELLER RUDMAN
 & DOWD LLP
 RACHEL L. JENSEN (211456)
 THOMAS R. MERRICK (177987)
 655 West Broadway, Suite 1900
 San Diego, CA 92101
 Telephone: (619) 231-1058
 Facsimile: (619) 231-7423
 rjensen@rgrdlaw.com
 tmerrick@rgrdlaw.com

Attorneys for Plaintiffs and the Proposed Class

UNITED STATES DISTRICT COURT
 SOUTHERN DISTRICT OF CALIFORNIA

TARLA MAKAEFF, et al., on Behalf of
 Themselves and All Others Similarly
 Situated,

Plaintiffs,

vs.

TRUMP UNIVERSITY, LLC, et al.,

Defendants.

Case No.: 3:10-CV-00940-CAB(WVG)

CLASS ACTION

**DECLARATION OF RONALD
 SCHNACKENBERG IN SUPPORT OF
 PLAINTIFFS' MOTION FOR CLASS
 CERTIFICATION**

District Judge: Hon. Cathy Ann Bencivengo
 Magistrate Judge: Hon. William V. Gallo

1 I Ronald Schnackenberg, hereby declare and state as follows:

2 1. I am a resident of San Francisco, California. If called as a witness, I could and
3 would competently testify as to all facts within my personal knowledge.

4 2. I worked for Trump University from October 2006 through May 2007. My title
5 was Sales Manager. I worked at Trump University's headquarters located at 40 Wall Street,
6 New York, New York. My job duties included selling Trump University programs to all
7 consumers who called to inquire about Trump University, and to sell courses to consumers
8 who attended live events.

9 3. I resigned from my position in May of 2007 because I believed that Trump
10 University was engaging in misleading, fraudulent and dishonest conduct. I found it
11 particularly offensive that, while Trump University claimed it wanted to help consumers make
12 money in real estate, in fact Trump University was only interested in selling every person the
13 most expensive seminars they possibly could.

14 4. For example, at a live event in New York City in April 2007, I spoke to a
15 couple whose names I believe are Chris and Carla (or Clara) Moore. After the hard-sell sales
16 presentation, they were considering purchasing the \$35,000 Elite program. I did not feel it
17 was an appropriate program for them because of their precarious financial condition – they had
18 no money to pay for the program, but would have had to pay for the program using his
19 disability income and taking out a loan based upon equity in his apartment. Trump University
20 reprimanded me for not trying harder to sell the program to this couple. Another sales person, I
21 believe his name was Tad Lignell, talked them into buying the \$35,000 seminar after I refused
22 to sell this program to them. I was disgusted by this conduct and decided to resign.

23 5. I never saw Donald Trump at Trump University. In the seven months that I
24 worked at Trump University, I did not see him once.

25 6. In my experience, the primary goal of Trump University was not to educate
26 students regarding real estate investing. The primary focus seemed to make money, as quickly
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1 and easily as possible. An example of this was the drastic discourse they took from their prior
2 line of business.

3 7. Gary Eldred wrote the "Real Estate Investor Training Program," which was an
4 online program with some interactive aspects (conference calls and video conferences). When
5 I accepted a job with Trump University, they were focused on selling the Real Estate Investor
6 Training Program.

7 8. However, around February 2007, the direction of Trump University's business
8 drastically changed to a "live events" and seminars driven by high-pressure front-end
9 salesmen, inexperienced in real estate, making high-pressure sales. If consumers attended the
10 event and did not purchase a seminar, the Trump University sales team followed up with them.

11 9. Trump University's live seminars and events were not based on the content of
12 Eldred's Real Estate Investor Training Program. Instead, Mark Dove, who essentially owns
13 that "front-end high-pressure speaker scam" world, provided speakers, instructors, mentors
14 and salespeople to Trump University, and these people brought with them their own programs,
15 which turned into Trump University's programs.

16 10. I was very uncomfortable with this new direction of business, as I believed it to
17 be very unethical.

18 11. While Trump University claimed that its teachers and mentors were all experts
19 in real estate, I believe that most of the instructors, mentors and coaches had very little or no
20 personal experience in the real estate techniques they were teaching, and that Trump
21 University misrepresented their experiences and successes to the public. I know this because I
22 received complaints from Trump University students about this. For example, David Stamper
23 was a mentor and front end speaker, but his background was in jewelry making and he did not
24 have any personal real estate experience when he was hired by Trump University.

25 12. From the very beginning, Trump University speakers told students to raise their
26 credit card limits so that they could be ready to purchase real estate. In fact, the speakers then
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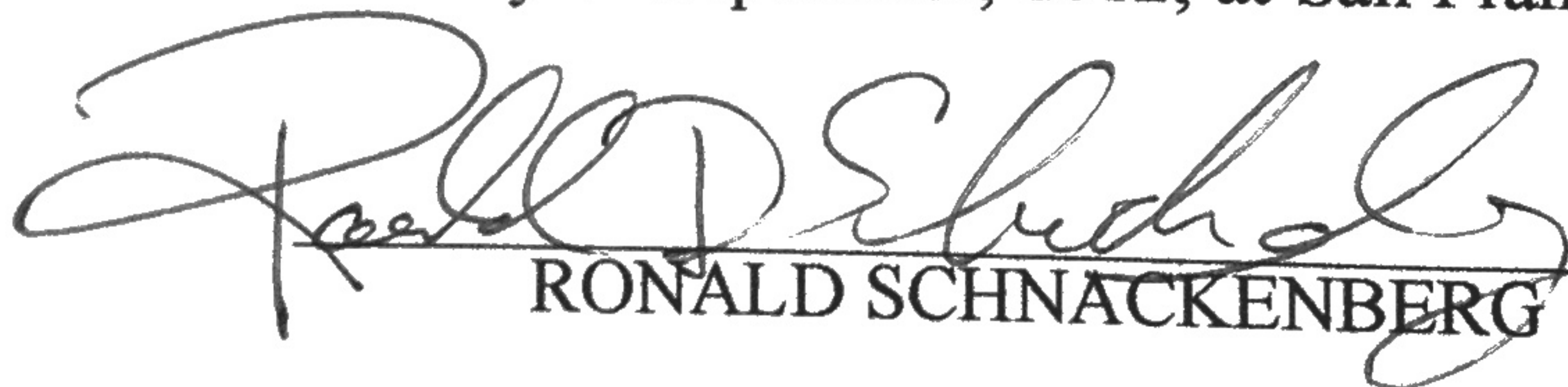
1 told students to use their increased credit limits to purchase the next level of Trump University
2 seminar.

3 13. In my position as a sales manager, I received calls from many students after
4 they had taken the Trump University seminars. In my experience, virtually all students who
5 purchased a Trump University seminar were dissatisfied with the program they purchased. To
6 my knowledge, not a single consumer who paid for a Trump University seminar programs
7 went on to successfully invest in real estate based upon the techniques that were taught.

8 14. Trump University's seminars were a scheme involving a constant upsell. Based
9 upon my experience at Trump University, the whole goal of the free seminar was to persuade
10 consumers to sign up for the \$1,500 seminar. Also based upon my experience at Trump
11 University, the whole purpose of the \$1,500 seminar was to get people to sign up for the
12 \$35,000 Elite seminars. And the whole purpose of the \$35,000 Elite seminars was to get
13 people to buy additional books, seminars and products.

14 15. Based upon my personal experience and employment, I believe that Trump
15 University was a fraudulent scheme, and that it preyed upon the elderly and uneducated to
16 separate them from their money.

17 I declare under penalty of perjury under the laws of the United States of America that
18 the foregoing is true and correct. Executed this 16 day of September, 2012, at San Francisco,
19 California.

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21 RONALD SCHNACKENBERG
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