

# EXHIBIT F



YK PANTONE 7503 C

Dear Friend:

You may never have another opportunity this big or this life-changing as long as you live. In fact, this may be the single best moment to get into real estate investing. *Ever*.

But before you jump in, I want to give you the benefit of my experience – to show you what to do and *not do* in this fast-changing market, and how to use it to turbo charge your earning power.

As I write, three key factors are converging to create *the* optimum environment for getting seriously rich in real estate – ***IF*** you jump in before everyone else figures it out:

1. **U.S. housing prices have sunk at the fastest rate in 2 decades** – people are desperate to sell and they're slashing prices so you can buy on the cheap.
2. **Housing inventories are at a 24-year high** – the market's flooded and even great property can't move fast enough.
3. **Interest rates haven't been this low in over 40 years** – which means you can fund your investments for considerably less.

All this adds up to the **best prices and lowest carrying costs on your pick of high quality real estate.**

It doesn't get any better than this. But I would advise that, before you try to profit in real estate on your own, you get a plan, have an airtight strategy and learn from the best.

Come to my free class. In just 90 minutes, my hand-picked instructors will share my techniques, which took my entire career to develop. Then, just copy exactly what I've done and get rich.

The free class will give you 7 takeaways from my top-tier instructors, trained in my every investment strategy. You can actually start using your new-found knowledge right away to profit.

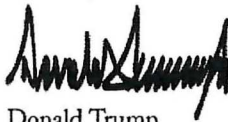
For example, you'll learn how you can:

- Build wealth faster and easier with real estate investing than via any other means.
- Profit from today's real estate market with little or no money.
- Make money while actually saving others from financial ruin.

Look, you've already got a pair of tickets in hand to a free class right in your area. You just need to reserve your spot. Typically, seats get snapped up within 1-2 days, so pick up the phone and call **1-888-TRUMP-09** (1-888-878-6709) or RSVP at [www.TrumpUniversityLive.com](http://www.TrumpUniversityLive.com).

Remember, you can still make a killing in real estate. I hope we'll see you in your free class so you learn to do it right.

Sincerely,



Donald Trump

REGISTER NOW – Call Toll-Free: 1-888-TRUMP-09 (1-888-878-6709)  
Or register online at [www.TrumpUniversityLive.com](http://www.TrumpUniversityLive.com)

25973 Trump (Page 2) Created: 7/22/09, 11:56 AM by: QuartzPress (U, T, S) 2000.0 dpi, Screened Data File PDF, Right-Handing, Color-Seps, Emb-Off, ID: Carol



# EXHIBIT G



CONFIDENTIAL

Michael Sexton

Makaeff v. Trump University

\*\* CONFIDENTIAL \*\* CONFIDENTIAL \*\*

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF CALIFORNIA  
CASE NO.: 10 CV 0940 EIG (WVG)

-----x  
TARLA MAKAEFF, BRANDON KELLER, ED OBERKROM  
and PATRICIA MURPHY, on Behalf of Themselves  
and all others Similarly Situated,

Plaintiffs,

-against-

TRUMP UNIVERSITY, LLC (AKA TRUMP  
ENTREPRENEUR INITIATIVE) a New York  
Limited Liability Company, DONALD J. TRUMP,  
and DOES 1 through 50, inclusive,

Defendants.

-----x

August 22, 2012  
9:57 a.m.

VIDEOTAPED DEPOSITION of MICHAEL SEXTON,  
30(b)(6) Witness in the above-captioned matter,  
taken by Plaintiffs, held at 725 Fifth Avenue,  
New York, New York, before Eileen Mulvenna,  
CSR/RMR/CRR, Certified Shorthand Reporter,  
Registered Merit Reporter, Certified Realtime  
Reporter and Notary Public of the State of  
New York.

CONFIDENTIAL

Michael Sexton

Makaeff v. Trump University

1                   **SEXTON - CONFIDENTIAL**

2           A.       Yes.

3           **Q.       New Orleans in 2008?**

4           A.       Yes.

5           **Q.       And Las Vegas in 2009?**

6           A.       Thank you, yes. That also solves  
7 the mystery.

8           **Q.       You threw me off there.**

9           A.       Those dates are killing me.

10          **Q.       Okay. And what was the purpose of**  
11 **the playbook?**

12          A.       It was -- it was an aggregation of  
13 all the standard operating procedures, rules,  
14 regulations that governed how we as an  
15 organization behaved and acted out in the field.

16          **Q.       Going back to the name, when you**  
17 **were changing the name to Trump Entrepreneur**  
18 **Initiative, did you consider any names that did**  
19 **not have Trump in them?**

20          A.       No, we did not.

21          **Q.       And why was it important to retain**  
22 **the name Trump?**

23          A.       We believed it had brand equity.  
24 There was value to it. Certainly from a  
25 continuity standpoint, it made a tremendous

CONFIDENTIAL

Michael Sexton

Makaeff v. Trump University

\*\* CONFIDENTIAL \*\* CONFIDENTIAL \*\*

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF CALIFORNIA  
CASE NO.: 10 CV 0940 EIG (WVG)

-----x  
TARLA MAKAEFF, BRANDON KELLER, ED OBERKROM  
and PATRICIA MURPHY, on Behalf of Themselves  
and all others Similarly Situated,

Plaintiffs,

-against-

TRUMP UNIVERSITY, LLC (AKA TRUMP  
ENTREPRENEUR INITIATIVE) a New York  
Limited Liability Company, DONALD J. TRUMP,  
and DOES 1 through 50, inclusive,

Defendants.

-----x  
August 23, 2012  
9:14 a.m.

CONTINUED VIDEOTAPED DEPOSITION of  
MICHAEL SEXTON, 30(b)(6) Witness in the  
above-captioned matter, taken by Plaintiffs, held  
at 725 Fifth Avenue, New York, New York, before  
Eileen Mulvenna, CSR/RMR/CRR, Certified Shorthand  
Reporter, Registered Merit Reporter, Certified  
Realtime Reporter and Notary Public of the State  
of New York.

CONFIDENTIAL

Michael Sexton

Makaeff v. Trump University

1                   SEXTON - CONFIDENTIAL

2           the controller.

3           **Q.       Who was the controller?**

4           A.       For Trump University?

5           **Q.       Yes.**

6           A.       Steven Matejek.

7           **Q.       Did you discuss advertisements with**  
8 **Donald Trump?**

9           A.       Yes, I did.

10          **Q.       How frequently?**

11          A.       Any time we had a new ad, we would  
12 discuss it.

13          **Q.       How often were there new ads**  
14 **created?**

15          A.       Print ads, fairly frequently. We  
16 would typically create a batch at one time and  
17 then have three or four approved -- present them  
18 to Mr. Trump, get approval on three or four  
19 different versions that we would then be able to  
20 go out and test over a period of time.

21          **Q.       Why did he want to be involved in**  
22 **reviewing and approving the advertisements?**

23                   MR. SCHNEIDER: Objection.

24                   Foundation.

25                   THE WITNESS: Mr. Trump

# EXHIBIT H



IN THE UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF CALIFORNIA

-----x

TARLA MAKAEFF, et al.,

Plaintiffs,

-against-

Civil Action No.

TRUMP UNIVERSITY, LLC, et al.,

10CV0940GPC(WVG)

Defendants.

-----x

\*\*\* CONTAINS CONFIDENTIAL PORTIONS \*\*\*

VIDEOTAPED DEPOSITION OF: MICHAEL I. BLOOM

Tuesday, November 4, 2014

New York, New York

Reported in stenotype by:  
Rich Germosen, CCR, CRCR, CRR, RMR  
NCRA & NJ Certified Realtime Reporter  
NCRA Realtime Systems Administrator  
Job No. 10013013

1 bit more in terms of just confirming my credibility  
2 of am I, you know, who I'm presenting myself to be  
3 in terms of a -- in terms of my skills.

4 Q. Did you sign a contract when you were  
5 hired?

6 A. What type of contract?

7 Q. Like an employment contract?

8 A. Well, I signed this application.  
9 What type of employment contract are you referring  
10 to?

11 Q. A lot of the speakers or mentors  
12 signed independent contractor contracts with Trump  
13 University, other employees had employment  
14 contracts. I'm just wondering whether you recalled  
15 if you signed a contract with Trump University?

16 A. Honestly, I don't, I don't recall.

17 Q. What was your title when you started  
18 working for Trump University in about September of  
19 2009?

20 A. I believe it was Chief Marketing  
21 Officer.

22 Q. And then that was your title  
23 throughout the time -- throughout the one year that  
24 you were at Trump University?

25 A. It was my title.

1 speculation.

2 A. Yeah, I couldn't -- I couldn't  
3 estimate why.

4 Q. And going back to your initial  
5 meeting with Donald Trump, was that -- was one of  
6 the subjects that was discussed the name change of  
7 Trump University?

8 A. No, no. That was much, much later,  
9 and I don't -- I don't recall specifically if that  
10 was content that was discussed in that brief  
11 meeting, that later meeting, but it certainly was  
12 not part of the earlier discussion.

13 Q. Did you ever discuss the name change  
14 with Donald Trump?

15 A. I don't specifically recall having an  
16 in-person discussion about the name change with  
17 Mr. Trump.

18 Q. Did you ever have conversations with  
19 Donald Trump by phone?

20 A. I did have one conversation with  
21 Mr. Trump by phone.

22 Q. When was that?

23 A. And that was I remember -- I don't  
24 remember the exact date, but I remember it well. It  
25 was the morning, the morning when we had the first

1 newspaper advertisement that I was involved with  
2 appearing in one of the New York newspapers, so it  
3 was coming out on that particular day, and I  
4 remember being at my desk very early in the morning  
5 and getting a call from Mr. Trump very early in the  
6 morning saying that he -- this is, you know,  
7 7 o'clock or thereabout in the morning and I  
8 remember him saying that he had seen the  
9 advertisement and was wondering who placed the  
10 advertisement. He liked the advertisement, but who  
11 placed the advertisement, and I said: Well, why do  
12 you ask? He said: Because it's on an even numbered  
13 page, and when you open a newspaper in the  
14 beginning, you want to be on an odd numbered page,  
15 so because it's a better position, and at that  
16 point -- and I said: You know, Mr. Trump, you are  
17 absolutely correct and that will never happen again,  
18 and at that point I realized that, you know, when it  
19 actually comes to placing of a newspaper, that's  
20 probably one of the most important questions you  
21 need to ask, and, you know, I remember coming off of  
22 that phone call saying to myself that he was, you  
23 know, very, very astute and very hands-on to be able  
24 to look at that himself and be interested in  
25 knowing, you know, where that ad is placed because

1 that is one of the most important factors, you know,  
2 in a newspaper ad. So, you know, the entire  
3 exchange lasted maybe 20 seconds, but I do remember  
4 walking off thinking that I was very impressed with  
5 that.

6 Q. And that would have been probably  
7 some time around October 2009?

8 A. Let's think. It had to be a little  
9 bit -- probably a little bit later than that. If I  
10 started in September of 2009, probably a little bit  
11 later. I don't know the exact date, but --

12 Q. After the first advertising?

13 A. After the first advertising, yes. I  
14 don't recall the exact date, but I imagine that you  
15 could track down -- track down that date.

16 Q. So Donald Trump was, you said, very  
17 hands-on in regard to the marketing of Trump  
18 University; is that right?

19 A. In this particular -- in this  
20 particular instance I thought that was very  
21 hands-on. I mean, I've not seen, you know,  
22 executives at that level before inquiring at that  
23 level of detail about a specific media, so, you  
24 know, that kind of struck me as -- you know, as very  
25 insightful.



1 that would come from because it was just a couple of  
2 different ways that we were channeling -- channeling  
3 back and forth.

4 Q. Were there occasions when Donald  
5 Trump or Rhona would indicate that the ad was not  
6 approved or that they wanted changes made to the ad?

7 A. Yes. There was one time that I  
8 recall the ad actually chopped off part of his head.

9 Q. Okay.

10 A. That was a bad -- that was a bad  
11 error.

12 Q. So he indicated that he wanted his  
13 head not chopped off?

14 A. Yeah. It just came -- it sliced a  
15 little too close to --

16 Q. Well, there is a lot of hair there.

17 A. Yeah. So you just don't do that. So  
18 that happened once and that's it.

19 Q. All right. So you corrected the ad  
20 to not cut off his head.

21 Do you recall any other times when  
22 there were changes that you needed to make in order  
23 to get the ad approved?

24 A. Those are the ones that stick out.

25 Q. You said those. That was one

1 occasion?

2 A. That is the one that sticks out for  
3 me.

4 Q. Was Donald Trump's main concern with  
5 the advertisements just, you know, his photograph or  
6 how he appeared in the advertisement?

7 MR. MORRIS: Objection. Calls for  
8 speculation.

9 A. Yeah, I don't -- I can't say.

10 Q. But the only correction that you  
11 recall making was one correction to the photograph  
12 of him; is that right?

13 A. From him. One of the steps that I  
14 would always put in place is having a couple of  
15 different sample ads. I remember there were two  
16 different ads and I recall vetting -- vetting them  
17 with Michael Sexton. I don't recall if both ads  
18 were sent up to Mr. Trump or just the one ad that we  
19 thought was the best presentation.

20 Q. Did Donald Trump have any corrections  
21 or changes to that ad?

22 A. Not that I recall.

23 Q. When you said that you always had a  
24 couple of different sample ads, does that mean that  
25 you would present Donald Trump with two ads, like A

# EXHIBIT I



**TRUMP**  
UNIVERSITY

**2010 PLAYBOOK**

ONE COMPANY. ONE CULTURE. ONE GOAL.  
Achieving Sustained Profitability in 2010.

T A B L E O F C O N T E N T S

I.....	COMPANY, CULTURE & GOAL.....	2
II.....	PROGRAMS & SERVICES.....	4
III.....	PREVIEW PLAYBOOK.....	12
IV.....	FULFILLMENT PLAYBOOK.....	25
V.....	RETREATS & SPECIAL EVENTS.....	42
VI.....	POLICY & PROCEDURE.....	48
VII.....	SALES PLAYBOOK.....	96
VIII.....	PC PLAYBOOK.....	139

Private & Confidential • Page 1

CONFIDENTIAL

Exhibit  
*Plts' 8 TU*  
 Eileen Mulvenna 8/23/12



**Preview Event Timeline:**

	Speaker	Sales Coordinator #1	Sales Coordinator #2	Program Coordinator
Evening Prior:	Event Team Meets, Walks the Event Space, and Discusses Plan of Action: <ul style="list-style-type: none"> <li>•Registration Roles</li> <li>•Speaker Introduction</li> <li>•Trigger Slide to Setup Sales Area</li> <li>•Sales Roles</li> </ul>			
2 Hours Prior:	Speaker Drops Off His Laptop To Hook Up to Audio Visual	Event Team Meets in Event Room to Setup Audio Visual, Banners, Directional Signage, Sales Coral, Front of Room, Tweak Chair Setup, and Locate Restrooms		
1 ½ Hours Prior:		Registration Area Is Set with Ironed Tablecloth and Visual & Sound Checks Have Been Done to Confirm Connections for <ul style="list-style-type: none"> <li>•Power Point Presentation</li> <li>•Speaker Laptop</li> <li>• Speaker Mic</li> <li>• Handheld Mic for Speaker Intro</li> <li>• IPod Sound</li> <li>•Recorder</li> </ul>		
1 Hour Prior:	Speaker Returns to Meeting Room to Get In "Preview Mindset"	Event Team Begins Registration & "Registration Roles" <ul style="list-style-type: none"> <li>•One Team Member Mans Registration Table</li> <li>•One Team Member Acts as "The Floater"</li> <li>•One Team Member Acts As "The Informant"</li> </ul>		
20 Minutes Prior:	Speaker and "The Informant" <ul style="list-style-type: none"> <li>•Adjust The Room As Necessary Based Upon Current Numbers At Registration</li> <li>•"The Informant" also caters to any last minute speaker</li> </ul>		Two Team Member Work Together At Registration to Identify Buyers and Register All Attendees <i>*See Registration Goals in Sales Playbook</i>	
15 Minutes Prior:	<ul style="list-style-type: none"> <li>•Welcome Announcement Is Made and Doors Open with Apprentice Song Playing <i>*See Team Door Introduction in Sales Playbook</i></li> <li>•All Attendees are Directed and Seated By Trump U Team Members in an Efficient and Organized Manner</li> <li>•Apprentice Song Transitions Into Trump Video</li> <li>•Registration is Continued Throughout by at least 1 Trump U Team Member</li> </ul>			
At Event Time:	<ul style="list-style-type: none"> <li>•Speaker Begins Presentation</li> </ul>	<ul style="list-style-type: none"> <li>•Speaker Introduction Is Made By Team Member <i>*See Speaker Introduction in Sales Playbook</i></li> <li>•Registration and Seating continues with 2 Team Members</li> </ul>		



# EXHIBIT J

**Gerald Martin**

**Makaeff vs. Trump University**

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF FLORIDA

TARLA MAKAEFF, et al.,

Plaintiffs,

vs.

CASE NO. 10CV0940GPC (WVG)

TRUMP UNIVERSITY, LLC, et  
al.,

Defendants.

\_\_\_\_\_ /

VIDEOTAPED DEPOSITION OF

GERALD MARTIN

Orlando, FL

November 05, 2013

Reported By:

Lori Bundy

RMR, FPR, RPR, CRR, CLR

Job No. 10008504

**Gerald Martin**

**Makaeff vs. Trump University**

1 question?

2 THE WITNESS: Yes. Yes, annual sales meeting,  
3 yes.

4 MS. ECK: Okay. Thank you.

5 VIDEOGRAPHER: We're off the record at 10:30 a.m.  
6 (A break was taken.)

7 VIDEOGRAPHER: We're back on the record at 10:39  
8 a.m.

9 BY MS. ECK:

10 Q. As part of your training, did Trump University  
11 teach you what Donald Trump's real estate investing  
12 techniques were?

13 A. I don't recall.

14 Q. So when you were teaching real estate techniques  
15 to the students who signed up for the seminars, did you  
16 understand that you were teaching general real estate  
17 techniques?

18 A. Yes, with -- yes.

19 Q. You weren't teaching Donald Trump's real estate  
20 investing techniques, were you?

21 A. No.

22 Q. Have you done any real estate transactions with  
23 Donald Trump?

24 A. No.

25 Q. Did you interview with Donald Trump?

http://www.yeslaw.net/help

Gerald Martin

Makaeff vs. Trump University

1 Q. Were you -- if a student signed up for an elite  
2 program, were you not paid commission until their  
3 evaluation was turned in?

4 A. No.

5 Q. It wasn't tied to the timing of the survey?

6 A. No.

7 Q. Did you tell students that you wanted them to  
8 rate you highly?

9 A. No.

10 Q. We were talking earlier about the Donald Trump  
11 videotape and that video was played at the start of each  
12 preview seminar; right?

13 A. Yes.

14 Q. Did you ever tell students that they should not  
15 rely on Donald Trump's representations in the video?

16 A. I don't recall, no.

17 Q. Did you ever tell students that Donald Trump's  
18 statements in the video weren't entirely accurate?

19 A. No.

20 Q. Did you ever tell students that they should call  
21 their credit card companies to try to raise their credit  
22 limits?

23 A. I don't recall.

24 Q. Did you ever tell students that they could use  
25 their credit cards to purchase real estate?

http://www.yeslaw.net/help

# EXHIBIT K



**From:** joe  
**To:** Allen  
**Subject:** RE: Trump University Appointment Confirmation  
**Date:** Thursday, September 10, 2009 9:26:15 AM

---

From: a  
To: benners5  
CC: a  
Date: Wed, 9 Sep 2009 16:18:53 -0400  
Subject: Re: Trump University Appointment Confirmation

Joe,

Thank you for your time on the phone today. I wanted to confirm your phone appointment with Terry Willardson for **Wednesday September 10<sup>th</sup> at 3:00PM EST**. In preparation for our appointment please complete the following questionnaire. Your answers to these questions will help us to determine which coaching program would be the best fit for you.

1. How many years have you currently been investing? (more than 10 years, between 5 and 10 years, less than 5 years, never invested before)
2. Are you looking to create residual income through Real Estate, or would you rather invest in large cash out deals?
3. Are you interested in Commercial Real Estate and/or Land Development?
4. Are you interested in no money down Real Estate?
5. If you had to come up with \$10K for a property, where would you get the money?
6. How much time can you commit each week towards working on your Real Estate goals?
7. What type of learning is best for you? (Books, Seminars, mentoring, trial and error)
8. Why are you ready to make changes in your life right now?
9. What 3 things would you like to accomplish in the next 12 months through your success in Real Estate?
10. What particular area of real estate investing are you most interested in?
11. How do you feel working one-on-one with Trump University can help you?

Please view the links below:

Trump Faculty: <http://www.trumpuniversity.com/company/faculty.cfm>

Trump Mentors: <http://www.trumpuniversity.com/company/real-estate-mentors.cfm>

Mr. Trump's comments about his university:

<http://www.trumpuniversity.com/blog/post/2005/06/why-i-started-trump-university-a-passion-for-learning.cfm>

Mr. Trump's video comments about his training: <http://www.youtube.com/watch?v=465T6EDzoH0>

Trump University Success Stories: <http://www.trumpuniversity.com/success-stories/index.cfm>

I'm also sending you a couple of good real estate investment articles to look at. We look forward to speaking with you again. Please call or email me to confirm the appointment.

CONFIDENTIAL

TU 141781  
Exhibit K  
page 269

Best Regards,

Allen [REDACTED]  
TRUMP UNIVERSITY  
1.877.508.7867 ext 3798



***"I'm deeply and actively involved in Trump University because I firmly believe in the power of education and its function as an engine of success." - Donald Trump***

This e-mail message, and any attachments to it, are for the sole use of the intended recipients, and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution of this email message or its attachments is prohibited. If you are not the intended recipient, please contact the sender by reply email and destroy all copies of the original message. Please note that any views or opinions presented in this email are solely those of the author and do not necessarily represent those of the company. Finally, while the company uses virus protection, the recipient should check this email and any attachments for the presence of viruses. The company accepts no liability for any damage caused by any virus transmitted by this email.

---

Windows Live: Keep your friends up to date with what you do online. [Find out more.](#)

# EXHIBIT L

Transcript of Main Promotional Video  
(TU-PLTF02441)

Donald Trump: At Trump University we teach success. That's what it's all about – Success. it's going to happen to you.

Speaker: Donald Trump is without question the world's most famous businessman. As a real estate developer he has reshaped the New York skyline with some of that great city's most prestigious and elegant buildings. Now Donald Trump brings his years of experience to the world of business education. With the launch of Trump University he makes the very best of America's business education available to you and others like you who seek a life of success, fulfillment and prosperity.

Donald Trump: If you're going to achieve anything you have to take action. And action is what Trump University is all about. But action is just a small part of Trump University. Trump University is about knowledge, about a lot of different things. Above all, it's about how to become successful. We're going to have professors and adjunct professors that are absolutely terrific. Terrific people, terrific brains, successful...The best. We are going to have the best of the best and honestly if you don't learn from them, if you don't learn from me, if you don't learn from the people that we're going to be putting forward – and these are all people that are handpicked by me – then you're just not going to make it in terms of the world of success. And that's ok, but you're not going to make it in terms of success. I think the biggest step towards success is going to be: sign up for Trump University. We're going to teach you about business, we're going to teach you better than the business schools are going to teach you and I went to the best business school. We're going to teach you better, it's going to be a shorter process, it's not going to involve years and years of your life, it's going to be less expensive and I think it's going to be a better education. And it's going to be what you need to know. It's not going to be a lot of different theory that doesn't matter and will never be put to use. It's going to be what you need to know. So, we're going to teach you business, we're going to teach you life, we're going to teach you salesmanship, we're going to teach you what you need to know. We're going to also make sure that no matter what you do, as I said before, you're going to love it. Because if you don't love it, it's never, ever, going to work.

# EXHIBIT M



EXHIBIT #: 479 \_\_\_\_\_

Retained by Witness

Retained by Counsel

Other: VIDEO FILE (SEE ATTACHED MEDIA DISK) \_\_\_\_\_

# EXHIBIT N

**From:** Art Cohen  
**To:** Tiffany Brinkman  
**Cc:** "James Harris"; "Rvan Lotman Gmail"; "Cory Lignell"  
**Subject:** Re: FW: !!! CONGRATS TO ALL NEW TRUMPSTERS !!!  
**Date:** Monday, May 11, 2009 2:02:58 PM

---

All:

Please give me your thoughts or more importantly, any red-flags with the corporate name:

AJZN Property Group, LLC A Delaware Corporation. I confirmed the name is available.

Please give me you thoughts before I "pull the trigger" today.

Cheers,

-Art

Tiffany Brinkman wrote:

Tiffany Brinkman  
**Trump University**  
40 Wall Street, 32nd Fl.  
New York, NY 10005  
Office: 646.810.7336  
Cell: 917.692.5420  
Fax: 212.248.0782  
[www.TrumpUniversity.com](http://www.TrumpUniversity.com)

---

**From:** James Harris [mailto: [REDACTED]]  
**Sent:** Sunday, May 10, 2009 9:46 PM

**Hey Gang...**

**Wow, What a weekend to get ready to start out May 09' out with a BANG !**

**I am very excited for all of you !**

**I hope you understand that you are now with the "Best Of The Best" in the Real Estate Industry...**

**You are now going to become a "TRUMPSTER" !**

**Say WOOOHOOO !**

**Real Estate is the quickest, most least resistance path to WEALTH that you and your family could ever be involved with....**



And the best part is...

You now can say that you are a "TRUMP GRADUATE" ! (use the name...you are in the family now)

\*\*\* 2009 IS YOUR YEAR TO CHANGE YOUR LIFE WITH TRUMP U. FOR YOU AND YOUR FAMILY = STICK WITH US ! \*\*\*

Attention:

\*\*\* Please make sure that you call & E-Mail Tiffany Brinkman # [REDACTED] [tbrinkman@trumpuniversity.com](mailto:tbrinkman@trumpuniversity.com) to pay your balances in full !

Until you are "*Paid In Full*" you will not receive anything from Trump U. in your package and your dates with your MENTOR will not be solid and confirmed until you are "Paid In Full" !

Please call and E-Mail your MENTOR today to confirm their arrival dates and get your "HOMEWORK" finished ASAP !

You will be getting a call from Brad Schneider or Jason Schauer to go over your "Packages" and "Mentors" !

TOP TRUMP CERTIFIED MENTOR

Kerry Lucas ph # [REDACTED] [REDACTED]

Tad Lignell ph # [REDACTED] [REDACTED]

URGENT:

Make sure you do your homework i.e.

HELOC, Personal Financial Statement, Biz Fianancial Statement, Biz Cards, Setting Up Power Team etc. before your MENTOR arrives are you are set up to "WIN BIG" during the 3 Days !

I feel blessed to have met you all and want to say "Thank You" for your energy, passion and commitment to the TRUMP LEGACY...

We NEED you to be successful !

I want to see you all on the next "Trump Video/Commercial" with your "Success Story"

Your Mentor For LIFE!

--

James Harris

Trump University Instructor  
"Mentor For Life"

This e-mail message, and any attachments to it, are for the sole use of the intended recipients, and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution of this email message or its attachments is prohibited. If you are not the intended recipient, please contact the sender by reply email and destroy all copies of the original message. Please note that any views or opinions presented in this email are solely those of the author and do not necessarily represent those of the company. Finally, while the company uses virus protection, the recipient should check this email and any attachments for the presence of viruses. The company accepts no liability for any damage caused by any virus transmitted by this email.

--  
Art Cohen

This message including its enclosures contains confidential information intended only for the use of the addressee(s) named above and may contain information that is legally privileged. If you are not the addressee, or the person responsible for delivering it to the addressee, you are hereby notified that reading, disseminating, distributing or copying this message is strictly prohibited. If you have received this message by mistake, please immediately notify us by replying to the message and delete the original message and its enclosures immediately thereafter. Thank you.

# EXHIBIT O

Kerry Alan Lucas

Art Cohen, et al. vs. Donald J. Trump

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

ART COHEN, Individually )  
and on Behalf of All )  
Others Similarly ) No. 3:13-cv-02519-GPC-WVG  
Situating, )  
 ) CLASS ACTION  
Plaintiff, )  
 )  
VS. )  
 )  
DONALD J. TRUMP, )  
 )  
Defendant. )

VIDEOTAPED DEPOSITION OF KERRY ALAN LUCAS  
June 11, 2015  
9:51 a.m. to 2:30 p.m.  
Regus – GAI Building  
618 East South Street, Suite 500  
Orlando, Florida 32801

Reported By:  
RHONDA HALL-BREUWET  
RDR, CRR, LCR, CCR, FPR, CLR,  
NCRA Realtime Systems Administrator  
Job No.: 10017047

Kerry Alan Lucas

Art Cohen, et al. vs. Donald J. Trump

1 A. Yeah.

2 Q. Is that through you?

3 A. Yeah.

4 Q. All right. Now, you mentioned, also, going  
5 out with clients and looking at properties. Is that  
6 something you do on a regular basis?

7 A. Yes.

8 Q. Do you have a real estate license?

9 A. No, I don't.

10 Q. So you'd still be involving a Realtor -- a  
11 Realtor would actually still be involved if there was  
12 actually a purchase going to happen, right?

13 A. Yes.

14 Q. Okay. So tell me, what does it mean when  
15 you're going out with a client and looking at  
16 properties?

17 A. Well, I'll go out, look at properties,  
18 analyze the properties, and it's always the client  
19 that would make the final decision. I don't say,  
20 "Hey, yeah, do this" or "Don't do that."

21 We look at -- we look at the properties;  
22 we'll run the numbers. And, you know, it depends on  
23 their risk tolerance, their financial capabilities.  
24 And I'll look at it and say, "Okay. This" -- "this  
25 is what the return is going to be on this, and this

http://www.yeslaw.net/help

Kerry Alan Lucas

Art Cohen, et al. vs. Donald J. Trump

1 is the time frame."

2 Q. I asked about Realtor, when you have a real  
3 estate license. I should have asked, also, you don't  
4 have a broker's license, do you?

5 A. No.

6 Q. How about an appraiser's license?

7 A. No.

8 Q. Any sort of mortgage broker certification?

9 A. No.

10 Q. Do you have any sort of real estate or real  
11 estate-related license or certification?

12 A. No.

13 Q. So when you say "run the numbers," are you  
14 talking about rental properties?

15 A. Yeah, rental properties or buying and  
16 rehabbing and selling it.

17 Q. So do you work closely with the Realtors in  
18 order to get comps and things like that?

19 A. Yes.

20 Q. Is the Realtor for the deal the primary  
21 source of the data that you use to run the numbers?

22 A. Yes. I mean, you can look up some on the  
23 Internet. But, yeah, the primary source would be the  
24 Realtor.

25 Q. How often are you out in the field looking

Kerry Alan Lucas

Art Cohen, et al. vs. Donald J. Trump

1 Q. Did your pay stay pretty much the same  
2 throughout that period or did it change?

3 A. On which period?

4 Q. Those two periods of time that you worked  
5 for them.

6 A. It changed.

7 Q. So what was it during the second stint, from  
8 2001 to 2006?

9 A. It was a three-day training, and it was  
10 \$1,500.

11 Q. Do you have any idea what the students paid  
12 for that three-day training?

13 A. No, I sure don't. They had different --  
14 they had different price ranges.

15 Q. Was the training you were providing still  
16 the same crunching numbers?

17 A. Yes.

18 Q. So, again, you weren't -- you weren't  
19 finding properties for students. You weren't doing  
20 any actual work rehabbing the properties, right?

21 A. Right.

22 Q. All those questions I asked you earlier  
23 about licenses and certifications in real estate or  
24 construction, your answers are true historically,  
25 also. You've never held any of those licenses or

http://www.yeslaw.net/help

Kerry Alan Lucas

Art Cohen, et al. vs. Donald J. Trump

1     certifications, right?

2             A.     Correct.

3             Q.     All right.    So we've now got American Cash  
4     Flow Institute, Wealth Rock, and -- let's see.    Let  
5     me -- Zurixx.

6                     Anybody else for whom you did any actual  
7     training or what you would call mentoring?

8             A.     No.

9             Q.     Now, when you were at American Cash Flow  
10    Institute, were you working with -- did the students  
11    bring you actual property they were looking at so you  
12    could crunch the numbers?

13            A.     They would -- they didn't bring them in to  
14    me at all.    They brought them in to some other  
15    instructors, but it wasn't -- it wasn't too heavily  
16    real estate, you know, oriented.

17            Q.     Okay.    What was the -- what was the focus  
18    mostly?

19            A.     Well, again, different cash flows.    Could be  
20    notes.    It could be factoring.    It could be business  
21    notes, structured settlements.

22            Q.     So what was the objective as far as teaching  
23    the students to be able to do what?

24            A.     Well, to be able to go find the deals; and  
25    then if someone was going to buy it, what the

http://www.yeslaw.net/help



Kerry Alan Lucas

Art Cohen, et al. vs. Donald J. Trump

1 estate experience?

2 A. No.

3 Q. Did you tell them you had any real estate  
4 experience actually buying real estate?

5 A. Well, again, at the time I was talking to  
6 him, I was in the process of looking.

7 Q. Okay. But did you tell him you had any  
8 experience of actually completing a purchase of a  
9 real estate property?

10 A. No.

11 Q. Did you tell them you had any experience of  
12 actually completing the sale of any real estate  
13 property?

14 A. No.

15 Q. All I'm getting at, Mr. Lucas, is that  
16 you -- you were honest with them. You didn't -- you  
17 didn't embellish your background, did you?

18 A. No. I'm not going to do that. But, again,  
19 as he was talking, he said, "Well, what are you  
20 currently doing?"

21 I said, "I'm up here" -- that's when I was  
22 up in the Newark area -- "looking at properties," and  
23 those are the properties that we bought.

24 Q. Those were the properties you bought in  
25 2009?

<http://www.yeslaw.net/help>

**Kerry Alan Lucas**

**Art Cohen, et al. vs. Donald J. Trump**

1 A. Yes.

2 MR. FORGE: We've been going for a little  
3 over an hour. Do y'all want to take a quick break.

4 THE WITNESS: That would be good.

5 MR. FORGE: Okay.

6 THE VIDEOGRAPHER: The time is 10:56. We're  
7 off record.

8 (Break taken from 10:56 a.m. to 11:07 a.m.)

9 THE VIDEOGRAPHER: This is Disk Number 2.  
10 The time is 11:07. We're back on the record.

11 BY MR. FORGE:

12 Q. Welcome back, Mr. Lucas.

13 A. Thank you.

14 Q. Mr. Lucas, when we left off, we just  
15 finished talking about your conversation with David  
16 Highbloom.

17 After you spoke with him and told him about  
18 your background, what happened next in the process of  
19 starting to work for Trump?

20 A. Well, I don't know. I didn't hear from him  
21 for, you know, a little bit. I don't know how long.  
22 A week or two or something like that. And then  
23 somebody obviously contacted me -- I can't remember  
24 all the details -- and talked to me about, you know,  
25 doing the -- doing the one-on-one mentorships.

http://www.yeslaw.net/help

Kerry Alan Lucas

Art Cohen, et al. vs. Donald J. Trump

1 A. No.

2 Q. Did Chris Goff tell you that one of the  
3 things you should do with the students is take them  
4 to Home Depot?

5 A. He had mentioned that people can do that if  
6 they want to do that.

7 Q. Did the training cover any real estate laws?

8 A. I can't remember.

9 Q. Have you had any real estate training in  
10 terms of the laws and regulations that apply to  
11 Realtors?

12 A. No, I haven't.

13 Q. I take it that means you haven't had any  
14 state-specific training as far as the real estate  
15 laws or guidelines that apply to any specific states?

16 A. Yes.

17 Q. That's a yes, you have not?

18 A. Yes. Correct.

19 Q. Who was the first student that you mentored  
20 through Trump?

21 A. I really can't remember.

22 Q. Do you remember where he or she was located?

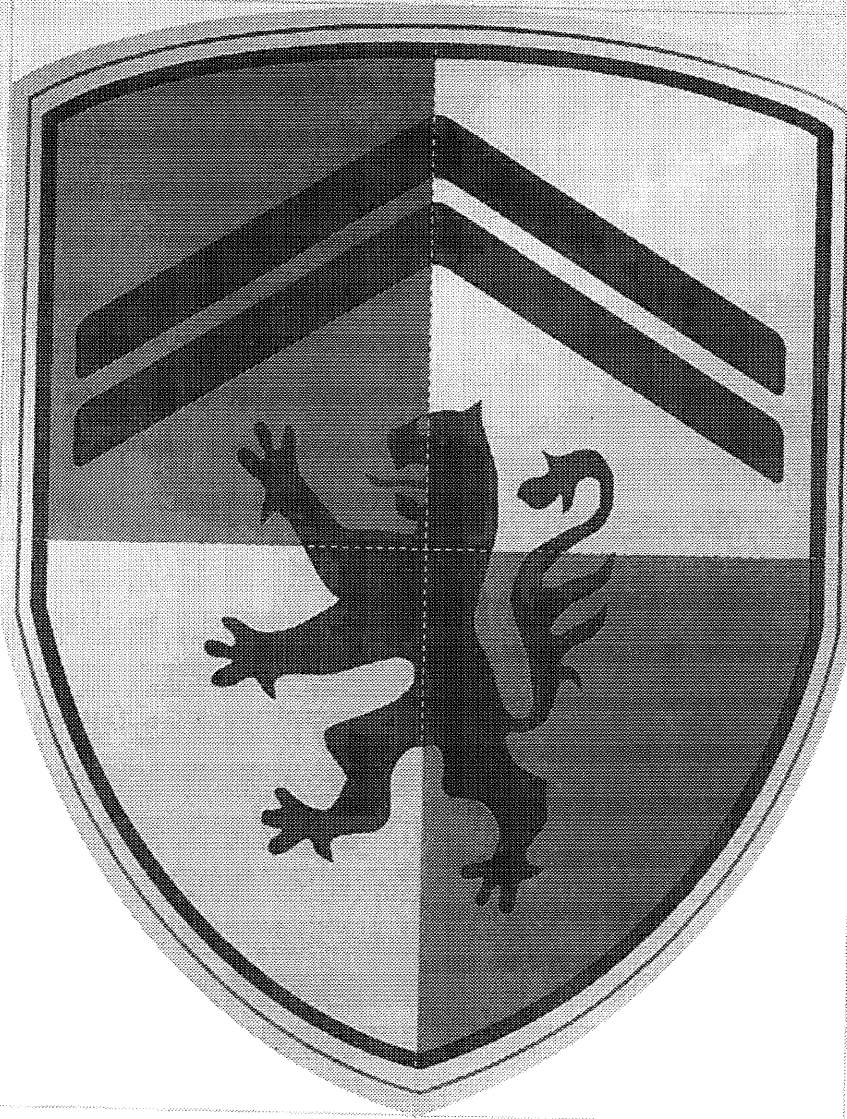
23 A. No, I don't.

24 Q. Do you remember approximately when you first  
25 mentored a student through Trump?

http://www.yeslaw.net/help

# EXHIBIT P

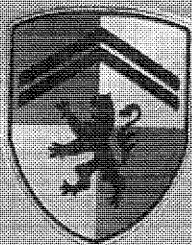
EXHIBIT 4  
WIT: Donnelly  
DATE: 11-2-12  
Micheal A. Johnson, CSR, CRR



# TRUMP UNIVERSITY

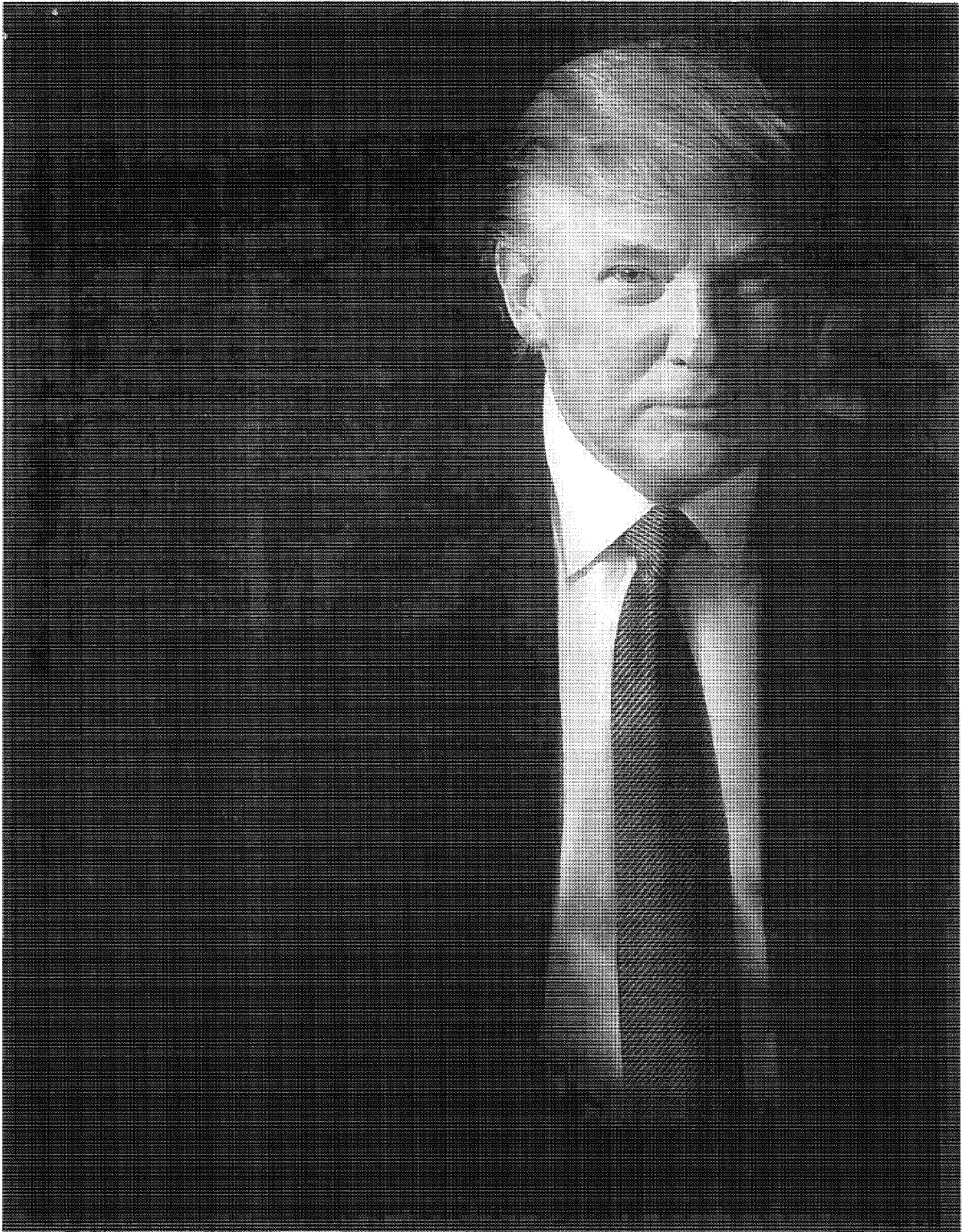
## Marketing Guidelines





The purpose of this document is to define and establish Trump University's branding strategy across all communication mediums both in visual and copy form. The strategy in this document should be used as a reference when marketing Trump University, as well as our products and services both to the press and the general public.





TU-DONNELLY0000003



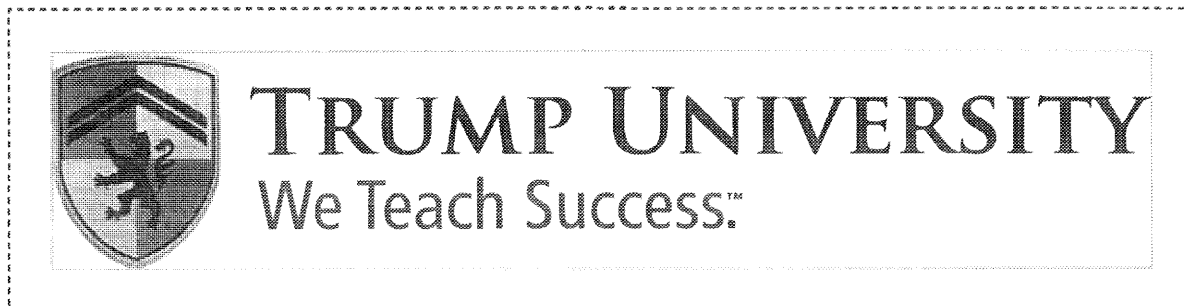
# Visual Guidelines

The following pages outline how  
to use Trump University's logos  
and other visual elements for print,  
online marketing, advertising, and  
promotional materials for TrumpU.

Strict compliance by our Strategic  
Partners, Third-Party Vendors and  
Freelance Professionals is required.

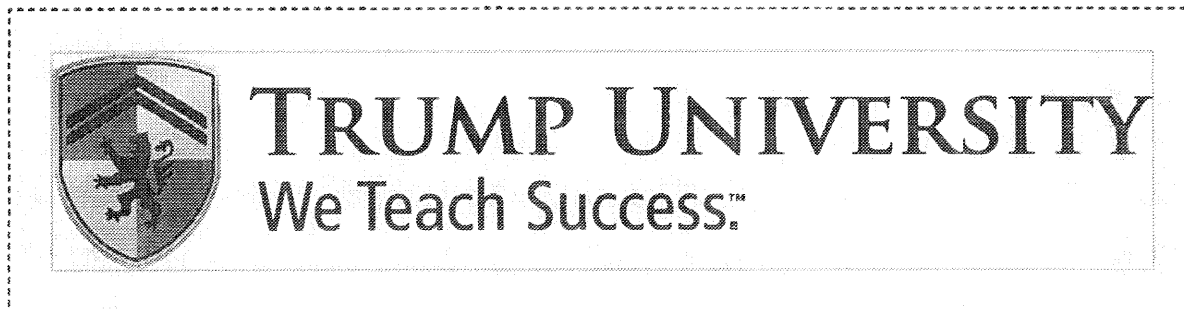


# 4-Color Logo - Version 1



**Version 1 - Logo with Tagline**

Always have 1/4 inch minimum of equal white space on all sides.



**Version 1 - Logo with Tagline on Colored Background**

Always have 1/4 inch minimum of equal white space on all sides.

Version 1 should only be used on light colored backgrounds.

**Tagline Color - 30% Cyan, 100% Magenta, 85% Yellow, 37% Black**

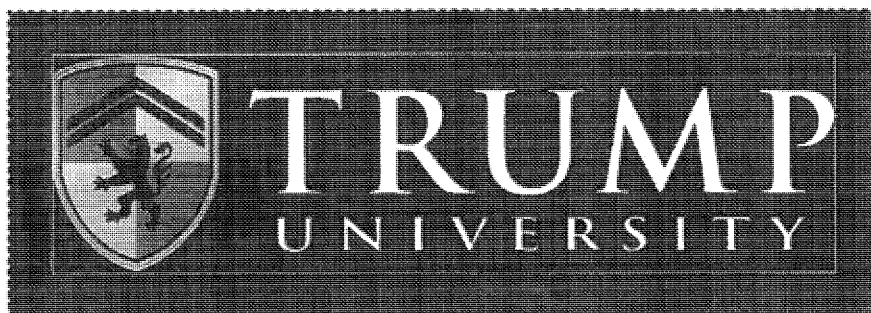


# 4-Color Logo - Version 2



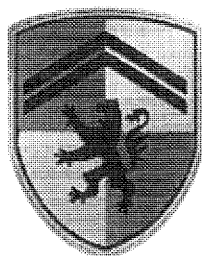
## Version 2 - Logo on 2 Lines

Always have 1/4 inch minimum of equal white space on all sides.



## Version 2 - Logo on 2 Lines Reverse

Always have 1/4 inch minimum of equal white space on all sides.



### The Shield

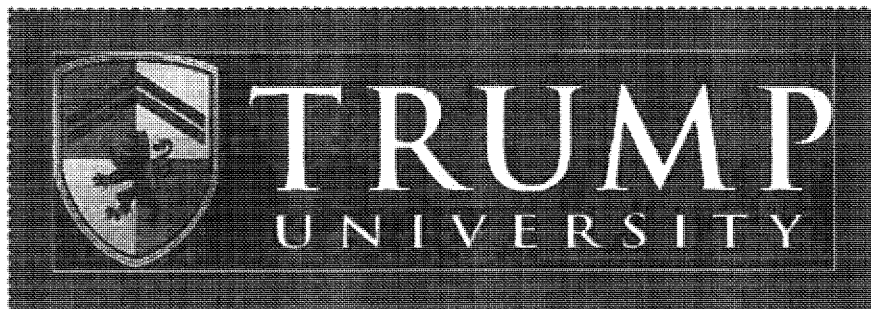
The Trump University shield may be used on its own, ONLY in areas where the logo will not fit. (For Example: Binder, Book or CD/DVD Spines.) The complete logo MUST appear somewhere on the document.

# 1-Color Logo - Black



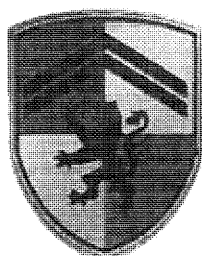
## Version 2 - Logo on 2 Lines

Always have 1/4 inch minimum of equal white space on all sides.



## Version 2 - Logo on 2 Lines Reverse

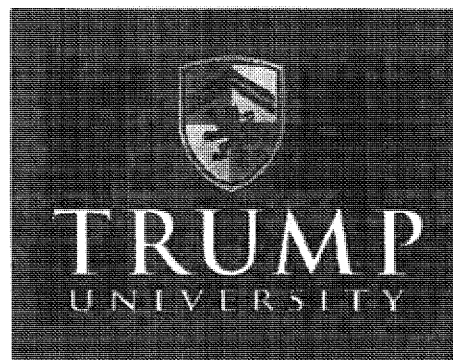
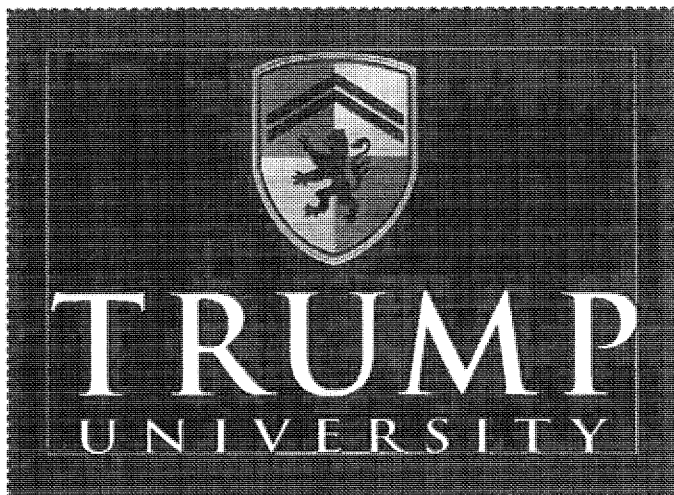
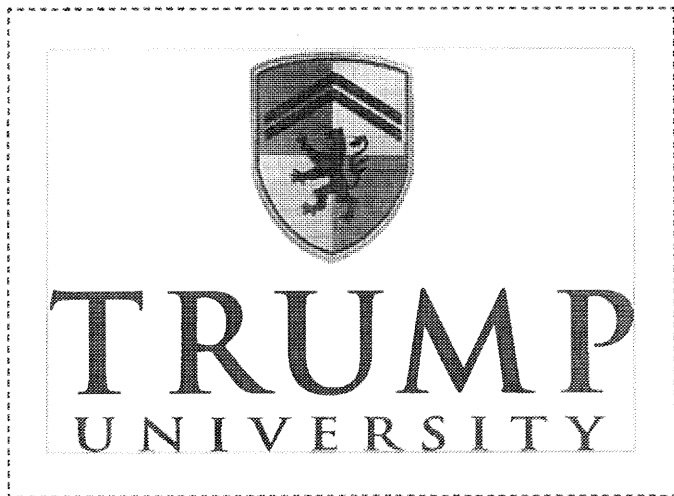
Always have 1/4 inch minimum of equal white space on all sides.



### The Shield

The Trump University shield may be used on its own, ONLY in areas where the logo will not fit. (For Example: Binder, Book or CD/DVD Spines.) The complete logo MUST appear somewhere on the document.

# 4-Color Logo - Version 3



## Version 3 - Logo Stacked

Always have 1/4 inch minimum of equal white space on all sides.



# Trump University Logo Usage



**TRUMP UNIVERSITY**  
We Teach Success.™

**Version 1 - Logo with Tagline**  
Use this version in all cases where large horizontal space is available.

**Get the world's best 3-day ROI**

Invest in your future. Learn from the best. Invest in your future. Learn from the best. Invest in your future. Learn from the best.

Trump University offers these 3 Day Innovative Retreats:

- Acute Protection
- Customer and Sales Family
- Franchise and Retail Risk Factor
- Advanced Investment Risk Factor

**Invest in Yourself!**  
Learn More Today

Participation is limited. Results are not guaranteed.  
1-888-668-7867  
www.TrumpUniversity.com/results

**HOW TO GET TRUMP'S MONEY**  
Choose one business course, get one FREE.

[Learn More](#)

**TRUMP UNIVERSITY**  
We Teach Success.™

[www.TrumpUniversity.com](http://www.TrumpUniversity.com)



**TRUMP UNIVERSITY**

**Version 2 - Logo on 2 Lines**  
Use this version in all cases where horizontal space is limited but vertical space is available.

**Get the world's best 3-day ROI**

Invest in your future. Learn from the best. Invest in your future. Learn from the best. Invest in your future. Learn from the best.

Trump University offers these 3 Day Innovative Retreats:

- Acute Protection
- Customer and Sales Family
- Franchise and Retail Risk Factor
- Advanced Investment Risk Factor

**Invest in Yourself!**  
Learn More Today

Participation is limited. Results are not guaranteed.  
1-888-668-7867  
www.TrumpUniversity.com/results

**HOW TO GET TRUMP'S MONEY**  
Choose one business course, get one FREE.

[Learn More](#)

Trump University Presents

**Trump Secrets of a Rich Mindset**

**2014**

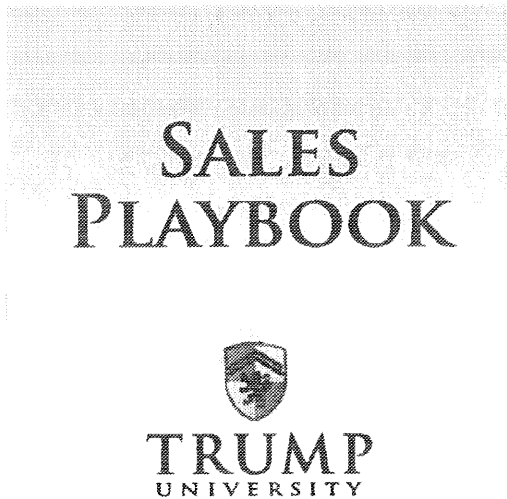
# Trump University Logo Usage



**TRUMP**  
UNIVERSITY

## Version 3 - Logo Stacked

Use this version in all cases where horizontal space is limited but vertical space is available.



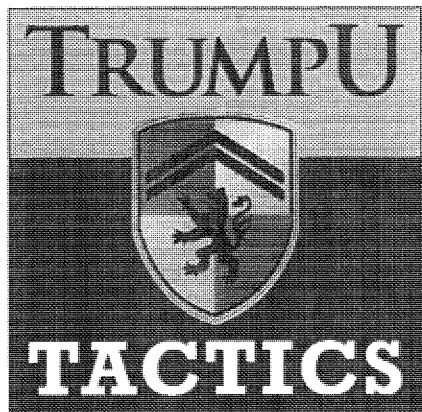
# TrumpU Logo Usage

# TRUMP U

Example 1



Example 2



## Font Usage & URL Treatment

TRAJAN PRO BOLD

WWW.TRUMPUNIVERSITY.COM

**Frutiger Black**

**www.TrumpUniversity.com**

When writing the Trump University URL, the T in Trump and the U in University must always be capitalized with no spaces; preceded by www. and followed by .com, all lower case. See above.

---

TRAJAN PRO

**Frutiger Bold - *Bold Italic***

**Frutiger Roman - *Italic***

**Frutiger Light - *Italic***

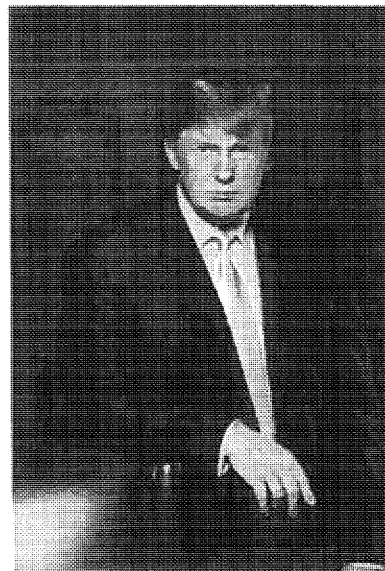
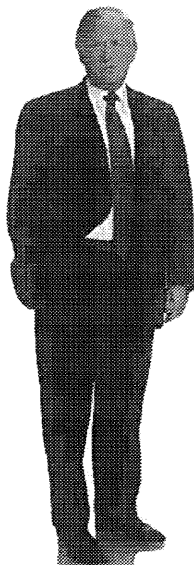
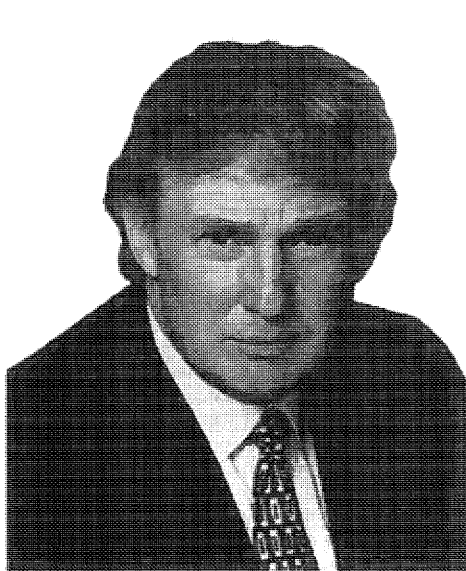
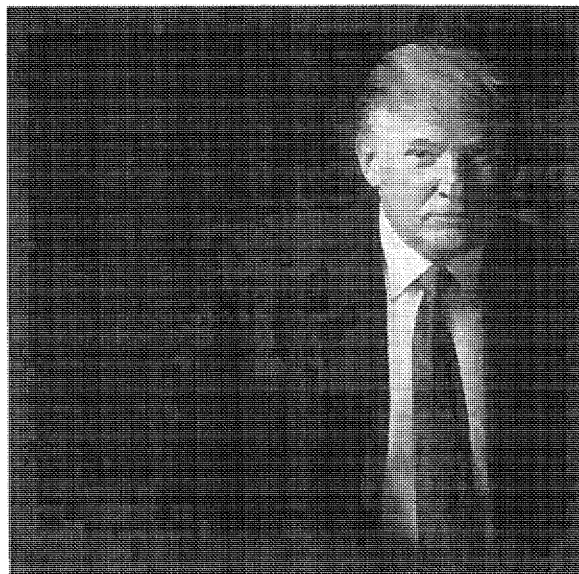
**Verdana Bold - *Bold Italic***

**Verdana - *Italic***

Limit fonts to ONLY the Trajan Pro and Frutiger families for Print and Verdana for Web.  
Text should be aligned flush left, NEVER centered.



# Donald J. Trump Approved Photographs





# Copy Guidelines

The goal of our copy guidelines is to ensure brand, tone and message consistency across all Trump University's marketing efforts. If you are uncertain about messaging or copy approach, please do not hesitate to direct those questions to The Trump University Marketing Department.



### **About Trump University**

Trump University is not your typical learning institute and it does not yield typical results for its members either. But with a man like Donald Trump behind it, how could Trump University not help you produce anything other than exceptional results? Since 2005, Trump University has been helping people achieve the privileged lives they've always dreamed about, and we will help you too. We guarantee it. This is not a guarantee we take lightly. We realize that Trump University can only reach its goal of being "the best" unless our members achieve their goals.

### **Tagline**

We Teach Success.

### **Mission Statement**

Trump University's mission is to provide educational programs and tools to help our clients achieve financial independence. Our success is measured by the results that our clients achieve applying what they have learned from us in the real world.

### **Trump University's Products and Services**

- The Marketing Mastery Program and The Entrepreneurship Mastery Program are referred to as "programs" or "comprehensive programs." They are not courses or classes.
- We offer real estate investor training via Trump University's School of Real Estate (we customize/personalize the right real estate investor training program for our members).
- Coaching is only referred to as coaching, never mentoring, or mentorship.
- We offer audio and online courses—some are instructor led, some are not.
- Retreats--2-3 day onsite training experiences with a top expert in the field.
- Seminars--1 or ½ day FREE learning events with a top expert in the field.
- Workshops—exclusive, members-only, 3 day training events with top experts in the field.
- Books
- Webinars—hour online and over the phone presentations led by a top expert in the field. Includes Q&A with participants.

### The Trump University Community

- Staff
- Faculty
- Instructors
- Program Directors (Trump University's Admissions Department)
- Consultants (Trump University's Admissions Department)
- Real Estate Experts
- Successful Entrepreneurs
- Business Investors

### Members

We always refer to our members as members.

### Donald J. Trump

- The first time you mention Mr. Trump in your copy, spell out his FULL name with initial. After that, you may use Donald Trump.
- Never refer to Mr. Trump as "The Donald."
- Never use Mr. Trump to sell. You may quote him, but don't use him as a "pitch man."
- Only use approved Trump quotes by Trump University.
- Emails should only come from Trump University.

### Catch Phrases/Buzz Words

Learn by doing

Practical

Tactical

Hands on approach

Immersive

We'll show you how

Real world education for the real world

Take action

Learn. Act. Succeed.

You can do this

Success

Goals

Financial freedom

Financial independence

Ivy League quality

Thriving community of members

Easy

Simple

Fast



### Tone

- Elitist
- Relevant
- Tough
- Respectful
- Confident
- Make TrumpU sound easy
- Always sell from a position of strength
- Think of Trump University as a real University, with a real Admissions process—  
i.e., not everyone who applies, is accepted
- Trump University is not about get rich quick schemes
- We are passionate about helping people achieve their vision of financial independence
- We are only as good as the results are members achieve
- We are with our members every step of the way (encouraging, supportive and  
full of guidance, experience and wisdom)
- Trump University is all about community
- Make copy very you-focused (it's always about them, not us)
- Focus on results
- Focus on the benefits of having Trump University on your side

### Usage of Trump University

Always use Trump University whenever possible. However, if there are times in copy where TrumpU reads better, you may abbreviate. But never use TrumpU in a headline or sub-header, only in the meat of your copy. Example: (Header) Trump University is Your Portal to Riches (Meat Copy): TrumpU members are taking action and succeeding.

### Call to Actions

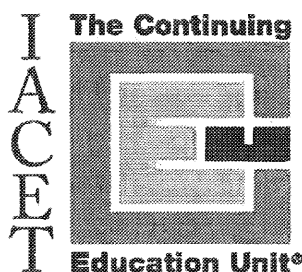
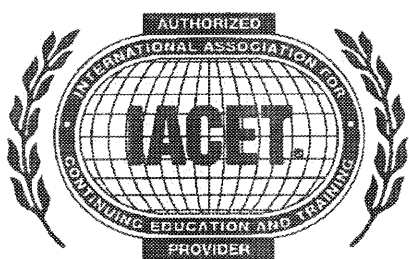
Let's avoid "buy now." (We are selling education, not a set of steak knives.)

Use terminology such as:	Enroll	Register	Apply
	Sign Up	Attend	Learn More
	Get Started	Start Now	Take Action

# IACET Logo and Statements

## Use of Authorized Provider Logo

Authorized Providers are encouraged to use the Authorized Provider logo and/or the CEU logo on their continuing education/training marketing or promotional materials for those units or programs of the organization that are authorized. Each provider will be given camera-ready copies of the logos for their use. Logos are also available as an electronic file. Use of the logos requires an accompanying statement (see next section).



## Approved Statements to be used by Authorized Providers

Upon approval, the provider will be assigned the most appropriate of the following statements for use on their promotional materials. The statement must be used when the logo is used.

### When approval is granted for the entire organization:

"The (organization) has been reviewed and approved as an Authorized Provider by the International Association for Continuing Education and Training (IACET), 8405 Greensboro Drive, Suite 800, McLean, VA 22102-5120. The (organization) has awarded (specific number) of CEUs to participants who successfully complete this program."

### When approval is granted for one unit of an organization:

"The (unit) of (organization) has been reviewed and approved as an Authorized Provider by the International Association for Continuing Education and Training (IACET), 8405 Greensboro Drive, Suite 800, McLean, VA 22102-5120. The (organization) has awarded (specific number) of CEUs to participants who successfully complete this program."

# Disclaimer/Legal Notice

While all attempts have been made to verify information provided in this publication, neither the Authors nor the Publisher assumes any responsibility for errors, inaccuracies or omissions. Any slights of people or organizations are unintentional.

This publication is not intended for use as a source of legal or accounting advice. The publisher wants to stress that the information contained herein may be subject to varying state and/or local laws and regulations. All users are advised to retain competent counsel to determine what state and/or local laws or regulations may apply to the user's particular business.

The purchaser or reader of this publication assumes responsibility for the use of these materials and information. Adherence to all applicable laws and regulations, both federal and state and local, governing professional licensing, is the sole responsibility of the purchaser or reader. The Authors and Publisher assume no responsibility or liability whatsoever on behalf of any purchaser or reader of these materials.

Real Estate investing, just like any other business, does contain risk. Real estate investors can both make and lose money on any given transaction. Like the stock market, poor decisions may result in the loss of all or part of an individual's working capital. Caution should always be used.

The Authors and Publishers are not giving any legal advice, nor functioning in any capacity as an attorney in this work. If legal or financial advice is needed, always consult a competent professional.

Foreclosure investing involves additional risk. You should seek the help of a competent attorney or professional for advice.

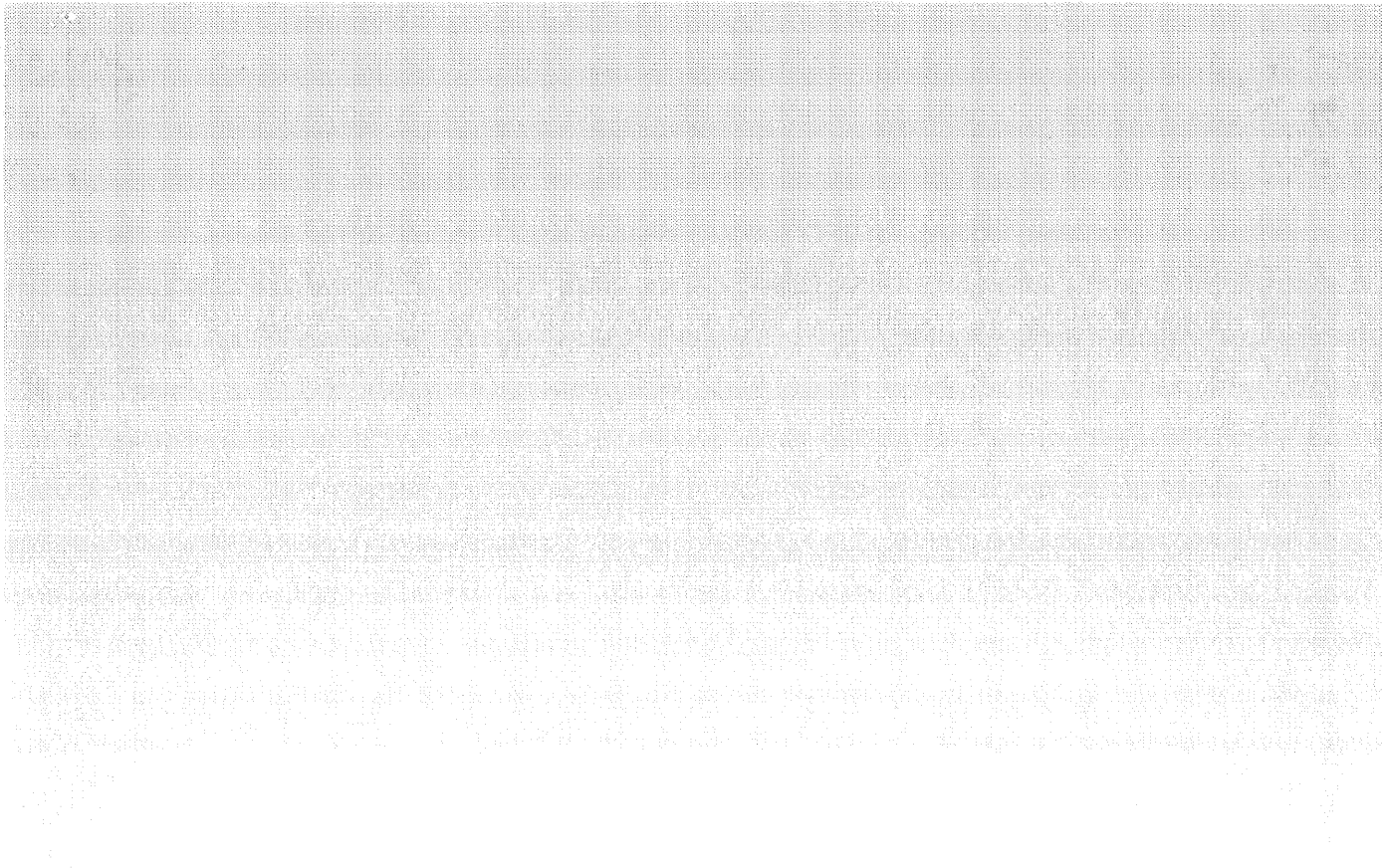
California has unique real estate laws. California investors should seek the help of a competent professional before undertaking any investing.

The information contained within the "Insert Name of Document" manual is protected under copyright laws of the United States. The material within this manual cannot be produced, copied, or redistributed without advanced express written permission of Trump University.

© Copyright 2007

Trump University  
40 Wall Street, 32nd Floor  
New York, New York 10005  
Phone: 212.248.1800  
Fax: 212.248.0782  
www.TrumpUniversity.com





**TRUMP UNIVERSITY**  
We Teach Success:

40 Wall Street, 32nd Floor  
New York, NY 10005  
[www.TrumpUniversity.com](http://www.TrumpUniversity.com)

TU-DONNELLY0000020



# EXHIBIT Q

EXHIBIT 498  
WIT: Trump  
DATE: 12-10-15  
E. Mulvenna, CSR/RMR/CRR

T. Trump



THE STATE EDUCATION DEPARTMENT / THE UNIVERSITY OF THE STATE OF NEW YORK / ALBANY, NY 12234

OFFICE OF HIGHER EDUCATION  
Assistant Commissioner - Office of Quality Assurance  
Room 977, Education Building Annex  
Albany, New York 12234  
E-mail: jfrey@mail.nysed.gov

Tel: (518) 486-3633  
Fax: (518) 486-2254

May 27, 2005

Donald Trump  
Chairman  
"Trump University"  
The Trump Building  
40 Wall Street, 33<sup>rd</sup> Floor  
New York, NY 10005-1304

Dear Mr. Trump:

I am writing concerning the use of the name, "Trump University" by your corporation for the on-line education company advertised on the Web site, [www.trumpuniversity.com](http://www.trumpuniversity.com).

Your Web site indicates that the address of "Trump University" is within New York State. In New York, only institutions authorized by the New York State Board of Regents to award degrees may use the words "college" or "university" in their names. New York State Education Law, §224(1), states that:

No individual, association, copartnership or corporation not holding university, college or other degree conferring powers by special charter from the legislature of this state or from the regents, shall confer any degree or use, advertise or transact business under the name university or college, or any name, title or descriptive material indicating or tending to imply that said individual, association, copartnership or corporation conducts, carries on, or is a school of law, medicine, dentistry, pharmacy, veterinary medicine, nursing, optometry, podiatry, architecture or engineering, unless the right to do so shall have been granted by the regents in writing under their seal.

The Board of Regents does not consent to the use of the word, "university," by other entities in ways that suggest that an entity is an institution of higher education. To implement §224(1)'s prohibition, §3.29 of the Rules of the Board of Regents (8NYCRR3.29) makes the following provisions:

(a) Except as provided in subdivisions (b) and (c) of this section, no individual proprietorship, association, co-partnership or corporation, other than the State University of New York and the City University of New York and their respective component institutions, a community college as defined in section 6301 of the Education Law, and an institution chartered by the Regents or by special act of the Legislature for the purpose of offering registered undergraduate and/or graduate courses of study creditable towards a degree, shall use the words "college" or "university" in its name.

Allen Weisselberg  
Exhibit\_375  
6/24/15

NYSED 000106

(b) This section shall not apply to corporations which are now using the word "college" in their corporate names and which had used the word "college" in their corporate names prior to the enactment of chapter 378 of the Laws of 1892, or to individual proprietorships, associations, co-partnership or corporations which do not offer educational programs and whose name includes the word "college" or "university" in a context from which it clearly appears that such entity is not an educational institution.

The Regulations of the New York State Commissioner of Education define "university" in §50.1 (8NYCRR50.1) as follows:

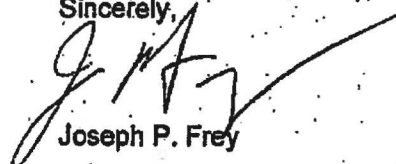
(f) *University* means a higher educational institution offering a range of registered undergraduate and graduate curricula in the liberal arts and sciences, degrees in two or more professional fields, and doctoral programs in at least three academic fields:

After reviewing the information included on your Web site about the purpose and operation of "Trump University," and based on the relevant laws and regulations cited above, I must ask you to discontinue the use of the name, "Trump University." Written confirmation that you have discontinued the use of this name is requested within 30 days of the date of this letter.

If you are interested in offering non-credit courses under a different corporate name, information concerning the New York State requirements for the operation of a non-degree granting proprietary school are available on our Web site at [www.highered.nysed.gov/bpss](http://www.highered.nysed.gov/bpss).

Deputy Commissioner Johanna Duncan-Poitier has attempted, unsuccessfully, to reach Michael Sexton, the President of "Trump University," to discuss this matter, and to offer information and assistance on the requirements to operate a higher education institution in New York State. We would welcome the opportunity to speak with Mr. Sexton or someone else involved in the administration of "Trump University." Deputy Commissioner Duncan-Poitier can be reached at (518) 474-3862 or I can be reached at (518) 486-3633.

Sincerely,



Joseph P. Frey

c: Johanna Duncan-Poitier  
Kathy A. Ahearn, Esq.

# EXHIBIT R

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X

TARLA MAKAEFF, et al., on  
Behalf of Themselves and Case No. 3:10-CV-00940-CAB(WVG)  
all Others Similarly Situated,  
Plaintiffs,  
v.  
TRUMP UNIVERSITY, LLC, et al,  
Defendants.

-----X

VIDEOTAPED DEPOSITION  
OF  
JASON NICHOLAS  
New York, New York  
Thursday, November 8, 2012

Reported by:  
ANNETTE ARLEQUIN, CCR, RPR, CRR, CLR  
JOB NO. 54531

1 J. Nicholas  
2 like, for instance, car payments and stuff.  
3 That was -- it was suggested that you write  
4 notes internally. You weren't supposed to write  
5 on your script, you were supposed to enter into  
6 the system, but in terms of the words and the  
7 order and the progression, then yes, absolutely.

8 Q. Paragraph 6, the line that says that,  
9 "The instructors were experts in today's real  
10 estate world and will teach all the non  
11 traditional or unconventional ways of buying  
12 real estate, this was not true."

13 What do you mean by that statement?

14 A. It pretty much speaks for itself. I  
15 mean...

16 Q. What was taught in the fast track of  
17 foreclosure seminar?

18 A. I mean these are general like in  
19 terms of the context, like these people were  
20 sold that they're going to get massive results,  
21 they're going to have people hold their hands  
22 and walk them through it and make them  
23 successful. That's the sale. That's the  
24 projection that you're painting to these people.

25 But this stuff rare -- you know, it's

# EXHIBIT S



1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA  
  
ART COHEN, Individually, and  
on Behalf of All Others  
Similarly Situated,  
  
Plaintiff, Case No.  
  
vs. 3:13-cv-02519-GPC-WVG  
  
DONALD J. TRUMP,  
  
Defendant.

---

VIDEOTAPED DEPOSITION OF ALAN D. WALLACE  
Los Angeles, California  
Monday, March 21, 2016  
Volume I

Reported by:  
CHERYL R. KAMALSKI  
CSR No. 7113  
  
Job No. 10022817



1 BY MR. COCHRAN:

2 Q Let's go to paragraph 25 because I think --  
3 or -- I'm sorry; page 25, paragraph 56.

4 MR. KIRMAN: I'm sorry. Say that one more  
5 time.

6 BY MR. COCHRAN:

7 Q Page 25, paragraph 56, of your report. And  
8 there you write:

9 "As a licensed and practicing real  
10 estate professional with over  
11 30 years of experience, I can attest  
12 that there are no methods to real  
13 estate investing that are unique to  
14 one individual investor," correct?

15 A Yes.

16 Q Okay. And you put the word -- in the  
17 sentence before that, you put the word "secrets" in  
18 quotation marks, correct?

19 MR. KIRMAN: Counsel, can you give the  
20 witness one moment to review the paragraph.

21 THE WITNESS: Yes, that's correct.

22 BY MR. COCHRAN:

23 Q And you put them in quotation marks because  
24 there are no secrets, correct?

25 MR. KIRMAN: Objection; vague.

1 THE WITNESS: There -- there are no secrets,  
2 like something proprietary or only one person in  
3 this world knows. That's what I am saying in  
4 paragraph 56, Counsel.

5 BY MR. COCHRAN:

6 Q Okay. And continuing in paragraph 56. At  
7 the bottom, you write (as read):

8 "...I view Mr. Trump's  
9 'secrets'" -- again 'secret' is in  
10 quote [sic] -- "to real estate  
11 investing as his impeccable  
12 execution of sound real estate  
13 investing techniques coupled with  
14 his personal attitude and approach  
15 to investing, which, as discussed  
16 above, TU incorporated in many of  
17 its lectures and course materials," right?

18 A Correct.

19 Q Is "impeccable execution of sound real estate  
20 investing" a secret?

21 MR. KIRMAN: Objection; vague.

22 THE WITNESS: No.

23 BY MR. COCHRAN:

24 Q Is that even a technique?

25 A Yes.

# EXHIBIT T



1 Day  
Left to Register  
For Our New  
2009 Workshop!



## Don't think you can profit in this market? You can. And I'll show you how.

Learn from Donald Trump's handpicked expert how you can profit from the largest real estate liquidation in history. Attend our **FREE investor workshop!**

He's the most celebrated entrepreneur on earth. He's earned more in a day than most people do in a lifetime. He's living a life many men and women only dream about. And now he's ready to share—with Americans like you—the Trump process for investing in today's once-in-a-lifetime real estate market.

Come to this **FREE introductory class** and you'll learn from Donald Trump's handpicked instructor a systematic method for investing in real estate that anyone can use effectively. You'll learn foreclosure investing from the inside out. You'll learn how to finance your deals using other people's money. You'll learn how to overcome your fear of getting started.

**"I can turn anyone into a successful real estate investor, including you."**

— Donald Trump

Today's financial crisis and credit crunch has politicians and bankers scrambling for answers. They've got bailouts and rescue packages **but who's helping you?** We'll help you by teaching you how to **profit from the billion dollar bailouts** that have opened the door for unprecedented investment opportunities.

With home prices dropping through the floor, historically low interest rates, and record high inventories, **2009 is the "perfect storm" for real estate investors** of every income and experience level. But you need to approach this with the kind of proven expertise contained in Donald Trump's powerful techniques and strategies.

**Get this \$50 gift absolutely FREE for attending:**

### Cash in on the Greatest Property Liquidation in History!

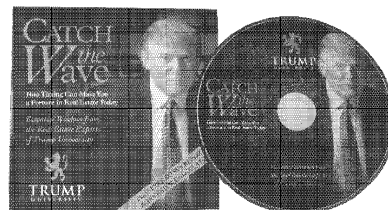
#### Discover how to ...

- ✓ Buy real estate from banks—at up to 70% below market value!
- ✓ Finance your deals creatively in today's tight credit market!
- ✓ Buy the right properties at the right time—and know when to sell!
- ✓ Secure your retirement by generating passive income!
- ✓ Invest in real estate through your IRA—tax free!
- ✓ Find pre-foreclosures in your area!

**"The training and coaching I received from Trump U is priceless. I closed on my first investment property (and) earned \$50,000."**

— Robert (Bob) Mulack,  
Ormond Beach, Florida

\*Personal Results, Results not typical



**Catch the Wave: How Timing Can Make You a Fortune in Real Estate Today**

**Four Days ONLY!**  
**Seating is Limited.**  
**Register Now at**  
**TrumpUniversityPhilly.com**

**or call**  
**888-TRUMP-14**  
**(888-878-6714)**

### MONDAY

July 6th  
1:00 PM & 6:30 PM

#### Mt. Laurel Marriott

915 Route 73  
Mt. Laurel, NJ

### TUESDAY

July 7th  
1:00 PM & 6:30 PM

#### Hilton Philadelphia City Avenue

4200 City Avenue  
Philadelphia, PA

### WEDNESDAY

July 8th  
1:00 PM & 6:30 PM

#### Philadelphia Marriott West

111 Crawford Avenue  
West Conshohocken, PA

### THURSDAY

July 9th  
1:00 PM & 6:30 PM

#### Sheraton Bucks County Hotel

400 Oxford Valley Road  
Langhorne, PA

Registration begins 30 minutes prior to start of classes.  
Classes begin promptly at the scheduled time.  
Donald Trump will not appear at the event.



**TRUMP**  
UNIVERSITY





## The next best thing to being his Apprentice

Learn from Donald Trump's handpicked expert how you can profit from the largest real estate liquidation in history. Attend our **FREE investor workshop!**

He's the most celebrated entrepreneur on earth. He's earned more in a day than most people do in a lifetime. He's living a life many men and women only dream about. And now he's ready to share—with Americans like you—the Trump process for investing in today's once-in-a-lifetime real estate market.

Come to this **FREE introductory class** and you'll learn from Donald Trump's handpicked instructor a systematic method for investing in real estate that anyone can use effectively. You'll learn foreclosure investing from the inside out. You'll learn how to finance your deals using other people's money. You'll learn how to overcome your fear of getting started.

**"I can turn anyone into a successful real estate investor, including you."**

— Donald Trump

Today's financial crisis and credit crunch has politicians and bankers scrambling for answers. They've got bailouts and rescue packages **but who's helping you?** We'll help you by teaching you how to **profit from the billion dollar bailouts** that have opened the door for unprecedented investment opportunities.

With home prices dropping through the floor, historically low interest rates, and record high inventories, **2009 is the "perfect storm" for real estate investors** of every income and experience level. But you need to approach this with the kind of proven expertise contained in Donald Trump's powerful techniques and strategies.

### Cash in on the Greatest Property Liquidation in History!

#### Discover how to ...

- ✓ Buy real estate from banks—at up to 70% below market value!
- ✓ Finance your deals creatively in today's tight credit market!
- ✓ Buy the right properties at the right time—and know when to sell!
- ✓ Secure your retirement by generating passive income!
- ✓ Invest in real estate through your IRA—tax free!
- ✓ Find pre-foreclosures in your area!

**"The training and coaching I received from Trump U is priceless. I closed on my first investment property (and) earned \$50,000."**

— Robert (Bob) Mulack,  
Ormond Beach, Florida

\*Personal. Results not typical.



**Get this \$50 gift absolutely FREE for attending:**

*Catch the Wave: How Timing Can Make You a Fortune in Real Estate Today.*

**Act Now! Space is limited, reserve your seat today at**  
**TrumpUniversityTexas.com or call 888-TRUMP-14 (888-878-6714)**

**MONDAY**  
April 6th  
1:00 PM & 6:30 PM  
**Sugar Land Marriott**  
Town Square  
16090 City Walk  
Sugar Land, TX

**TUESDAY**  
April 7th  
1:00 PM & 6:30 PM  
**Hilton Houston**  
NASA Clear Lake  
3000 NASA Parkway  
Houston, TX

**WEDNESDAY**  
April 8th  
1:00 PM & 6:30 PM  
**Houston Marriott North**  
at Greenspoint  
255 N Sam Houston Parkway East  
Houston, TX

**THURSDAY**  
April 9th  
1:00 PM & 6:30 PM  
**JW Marriott**  
Hotel Houston  
5150 Westheimer Road  
Houston, TX



Registration begins 30 minutes prior to start of classes. Classes begin promptly at the scheduled time. Donald Trump will not appear at the event.

TU 62064

# SEM\_Preview\_DallasFortWorth\_20091015

To ensure that you continue to receive emails from us, add email@info.trumpuniversity.com to your address book today.



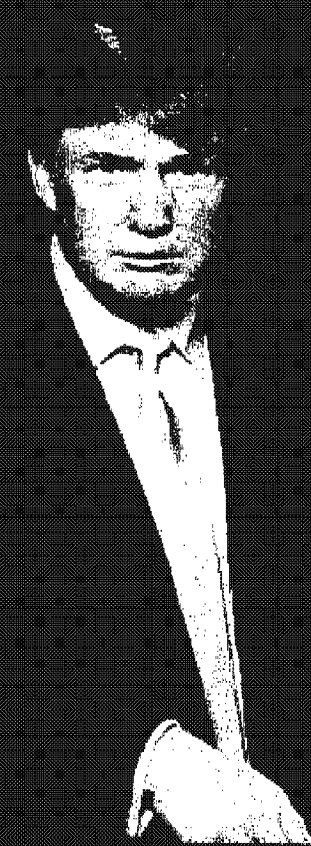
## MY EXPERT TRAINERS ARE COMING **RIGHT TO YOUR AREA**

Prices and interest rates are at unprecedented lows and demand for real estate is on the rise. **NOW is the perfect time to invest in real estate.**

Attend Trump's Profit from Real Estate Investing Class and Learn How to Successfully Invest in this Historic Buyer's Market:

- Get customized strategies to achieve YOUR long term OR short term personal investment goals
- Generate positive cash flow and passive income OR quick profits
- Find investment properties right in your neighborhood
- Learn simple negotiating strategies to help you close profitable deals
- Implement the Trump Blueprint for consistent gains

**REGISTER NOW!**



"Nobody on the planet can teach you how to make money in real estate better than I can."

Master Wealth Builder - Donald J. Trump

**Click here to register now for your FREE Profit from Real Estate Investing Class**

and learn Trump's proven strategies to help you profit from today's extraordinary buyer's market.

**REGISTER NOW!**



# EXHIBIT U



TRUMP



From Donald J. Trump

*Special Invitation*

*Build Your Future In Real Estate*

*Event Locations, Dates, and Times*



Registration is 30 minutes prior to start of classes. Classes begin promptly at the scheduled time.

*Workshop that I attended*

Sunday, November 15, 2009 1:00 PM and 7:00 PM <b>Hilton Garden Inn</b> <b>Carlsbad Beach</b> 6450 Carlsbad Boulevard Carlsbad, CA	Monday, November 16, 2009 1:00 PM and 7:00 PM <b>San Diego Marriott</b> <b>La Jolla</b> 4240 La Jolla Village Drive La Jolla, CA	Tuesday, November 17, 2009 1:00 PM and 7:00 PM <b>San Diego Marriott</b> <b>Mission Valley</b> 8757 Rio San Diego Drive San Diego, CA	Wednesday, November 18, 2009 1:00 PM and 7:00 PM <b>The Westin Gaslamp</b> <b>Quarter, San Diego</b> 910 Broadway Circle San Diego, CA
--	---	--	---

Call or go online to accept your complimentary invitation.  
 Seating is limited. To guarantee a place call or log on today!

888-878-6709 • [TrumpULive.com](http://TrumpULive.com)



# Redacted

Dear Friend,

What would your life be like *now* if you had invested in real estate during the buyer's market of the 1990s?

Smart people who *did* buy investment properties then, now enjoy a life that most only dream about ... monthly positive cash flow ... passive income ... the freedom to work less or even quit their jobs forever. **Many of those investors are now multimillionaires.**

But you don't have to wonder, what if ... because right now, you have the opportunity *to build your wealth*. You can profit from the largest buyer's market in history. **Many new millionaires will emerge on the other side of this crisis.** I'm advising people to buy—but not blindly.

That's why I'm sharing my proprietary "Blueprint For Real Estate Success" ... knowledge that can **empower you to be the one who wins in this downturn.** You've seen other real estate courses offered by so-called experts. But no course offers the same depth of insight, experience, and support as the one bearing my name, the one from Trump U.

Learn more about **building wealth and creating financial freedom now** at a **FREE Trump U Workshop**. Secure your reservation—for you and a guest—to attend the upcoming workshop in your area. Call 1-888-878-6709 or log onto [www.TrumpULive.com](http://www.TrumpULive.com).

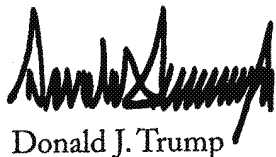
My hand-picked instructors and mentors will show you how to use real estate strategies to:

- Supplement or even replace your income
- Secure your long term financial future
- Find targeted leads in your neighborhood
- Negotiate win-win deals
- Work less and achieve your dreams
- Start profiting today!

*Now* is the time to create your financial legacy. **You can do it**, even if you only have five or ten hours a week to spare. With our simple instructions and practice exercises—and ongoing support from your own Team Of Trump Experts—you'll have what you need to succeed!

**You don't want to ask yourself—10 years from now—why you didn't invest in the historic buyer's market of 2009!**

Learn more about **BUILDING WEALTH and CREATING FINANCIAL FREEDOM NOW** at a **FREE Trump U Workshop**. Secure your reservation—for you and a guest—to attend the upcoming workshop in your area. Call 1-888-878-6709 or log onto [www.TrumpULive.com](http://www.TrumpULive.com).



Donald J. Trump

P.S. The first 100 attendees will receive a **FREE copy of my blockbuster CD, *Secrets of Real Estate Marketing* ... a \$129 value!**