

EXHIBIT A

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 Haeggquist, representing the plaintiffs.

3 MR. SCHNEIDER: David Schneider for
4 Trump University and Donald Trump, the
5 defendants.

6 THE VIDEOGRAPHER: Will the court
7 reporter please swear in the witness.

8 MICHAEL SEXTON,
9 having been duly sworn by Eileen Mulvenna,
10 a Notary Public of the State of New York,
11 was examined and testified as follows:

12 EXAMINATION

13 BY MS. JENSEN:

14 Q. Good morning, Mr. Sexton.

15 A. Good morning.

16 Q. I'm Rachel Jensen. I'm here
17 representing the plaintiffs.

18 And if you would, before we get
19 started, could you just please state your name
20 and your full address for the record.

21 A. Sure. It's Michael Sexton. And my
22 address is [REDACTED]

23 [REDACTED]

24 Q. Okay. Perfect.

25 And, Mr. Sexton, what is your place

CONFIDENTIAL

Michael Sexton

Makaeff v. Trump University

1 SEXTON - CONFIDENTIAL

2 Q. Would you spell his last name just
3 for the record.

4 A. Sure.

5 I believe it's G-R-E-E-N-B-L-A-T-T.

6 Q. And what was his role in the
7 discussions?

8 A. Again, very much similar to Allen's,
9 one of adviser to Mr. Trump.

10 Q. He didn't have any interest in Trump
11 University; is that correct?

12 A. Correct.

13 Q. And was anybody else involved in
14 those early discussions?

15 A. No, that really was it. I may be
16 missing one person at one meeting, but . . .

17 Q. And through the course of the those
18 discussions -- those discussions, what was the
19 concept that emerged as to Trump University?

20 A. The concept was to marry world-class
21 subject matter experts with an e-learning expert
22 and create, you know, cost-effective,
23 high-quality curriculum across a broad range of
24 business subjects and, through technology, be
25 able to service up to small business owners and

CONFIDENTIAL

Michael Sexton

Makaeff v. Trump University

1 SEXTON - CONFIDENTIAL

2 individual entrepreneurs around the world.

3 **Q. And when you say a broad -- I think**
4 **you said across a broad spectrum of topics, was**
5 **it -- was it confined to real estate or broader**
6 **than real estate?**

7 **A. Initially it was much broader than**
8 **real estate. Real estate was a small component.**
9 **It was traditional business curriculum. It was**
10 **marketing, finance, sales, entrepreneurship.**
11 **Real estate would be one component.**

12 **Q. In the implementation of Trump**
13 **University's programs, did it ultimately result**
14 **in a real estate focused program?**

15 **A. Yes, it did.**

16 **Q. Were there any other focuses of**
17 **Trump University?**

18 **A. Yes, there were. Marketing,**
19 **entrepreneurship, negotiations, sales**
20 **effectiveness. We experimented with a number of**
21 **different subject areas beyond real estate.**

22 **Q. And when you say you experimented**
23 **with them, was it all through the online or**
24 **e-learning platform?**

25 **A. No, it was -- it was a mix. We**

CONFIDENTIAL

Michael Sexton

Makaeff v. Trump University

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

C E R T I F I C A T I O N

STATE OF NEW YORK)
) ss:
COUNTY OF WESTCHESTER)

I, Eileen Mulvenna, CSR/RMR/CRR and a notary public within and for the State of New York, do hereby certify:

That I reported the proceedings in the within-entitled matter, and that the within transcript is a true record of such proceedings.

I further certify that I am not related by blood or marriage to any of the parties in this matter and that I am in no way interested in the outcome of the matter.

IN WITNESS WHEREOF, I have hereunto set my hand this 5th day of September, 2012.



Eileen Mulvenna, CSR/RMR/CRR
Eileen Mulvenna Goldstein