

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF NEW YORK

-----X

THE PEOPLE OF THE STATE OF NEW YORK,  
by ERIC T. SCHNEIDERMAN, Attorney General of the  
State of New York,

Petitioner,

-against-

Index No. 451463/2013

IAS Part \_\_\_\_\_

Assigned to Justice \_\_\_\_\_

THE TRUMP ENTREPRENEUR INITIATIVE LLC f/k/a  
TRUMP UNIVERSITY LLC, DJT ENTREPRENEUR  
MEMBER LLC f/k/a DJT UNIVERSITY MEMBER LLC, DJT  
ENTREPRENEUR MANAGING MEMBER LLC f/k/a DJT  
UNIVERSITY MANAGING MEMBER LLC, THE TRUMP  
ORGANIZATION, INC., TRUMP ORGANIZATION LLC,  
DONALD J. TRUMP, and MICHAEL SEXTON,

Respondents.

----- X

**EXHIBITS TO THE AFFIRMATION OF ASSISTANT ATTORNEY GENERAL  
TRISTAN C. SNELL IN SUPPORT OF THE VERIFIED PETITION  
VOLUME 4 OF 9 – EXHIBITS J-L43**

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Bureau Chief  
Consumer Frauds and Protection Bureau

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Deputy Bureau Chief  
Consumer Frauds and Protection Bureau

MELVIN L. GOLDBERG  
TRISTAN C. SNELL  
Assistant Attorneys General

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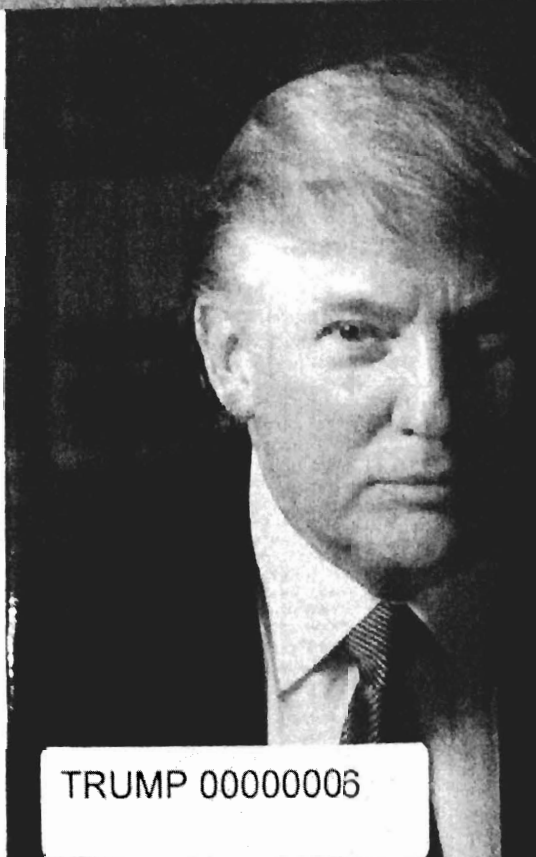


# Exhibit J



**TRUMP**  
UNIVERSITY

# ASSET PROTECTION 101



**Tax and  
Legal  
Strategies  
of the Rich**

TRUMP 00000006

J.J. CHILDERS, JD

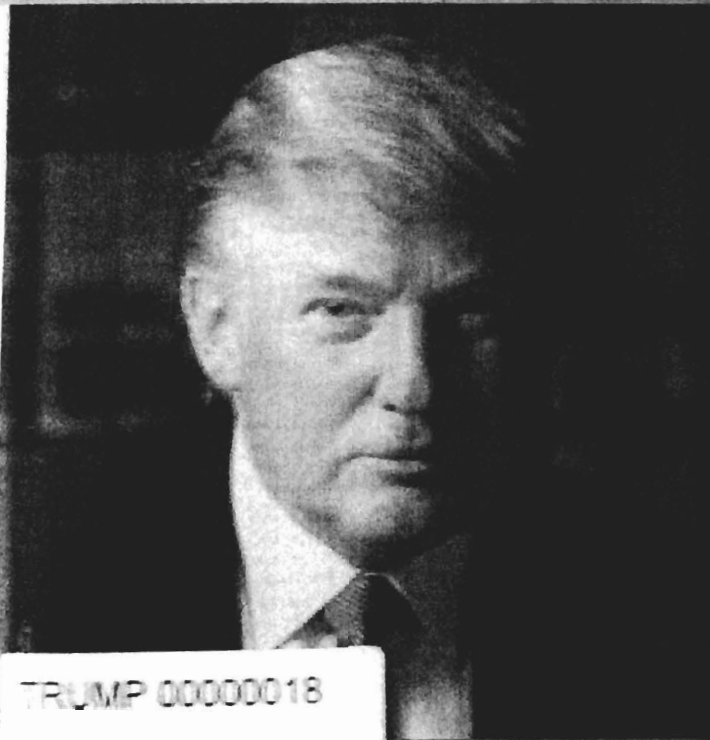
FOREWORD BY DONALD TRUMP

000002



**TRUMP**  
UNIVERSITY

# BRANDING 101



**How to  
Build the  
Most Valuable  
Asset of  
Any Business**

TRUMP 00000018

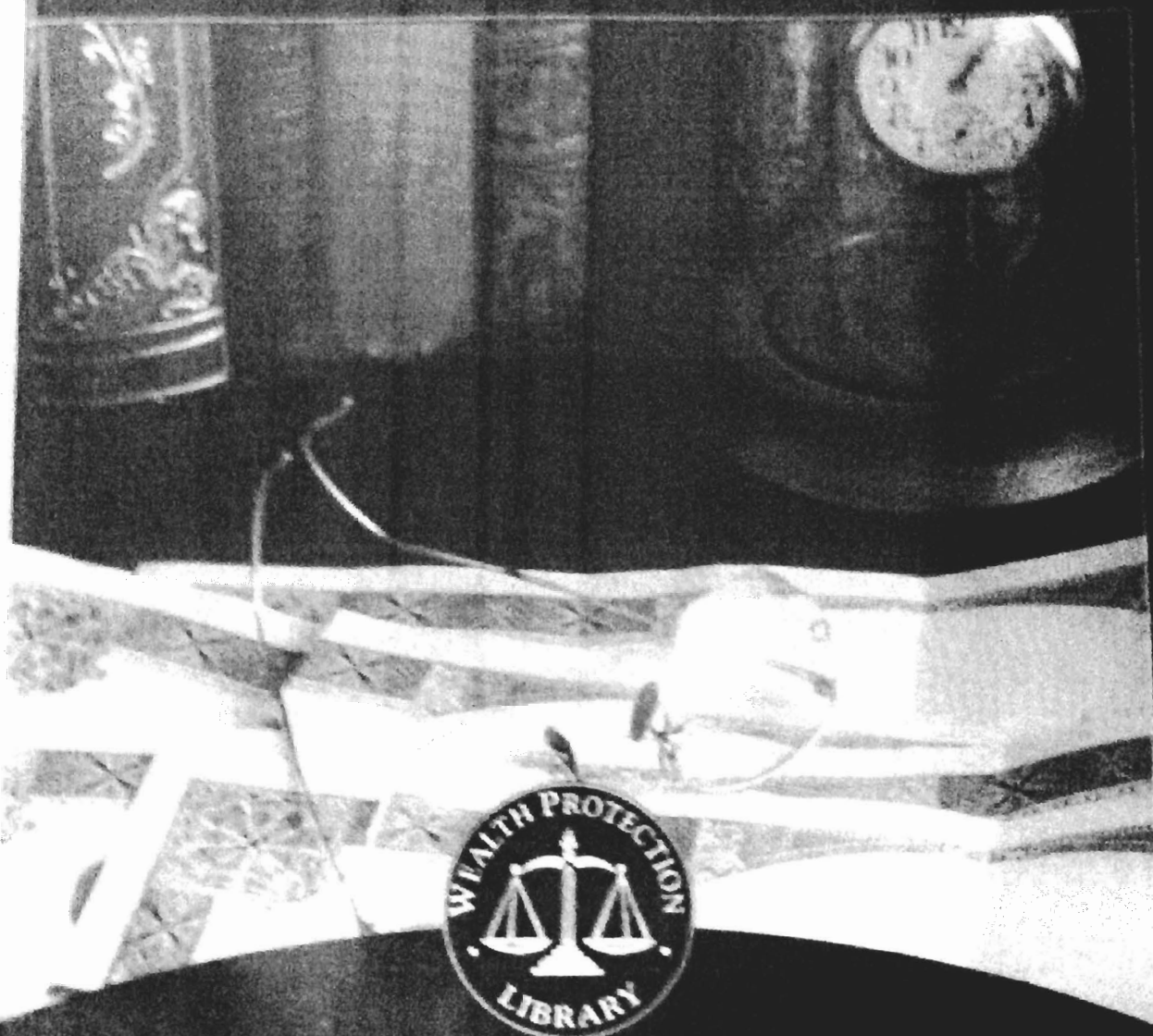
DON SEXTON

FOREWORD BY DONALD TRUMP 1

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TRUMP  
UNIVERSITY



CORPORATIONS

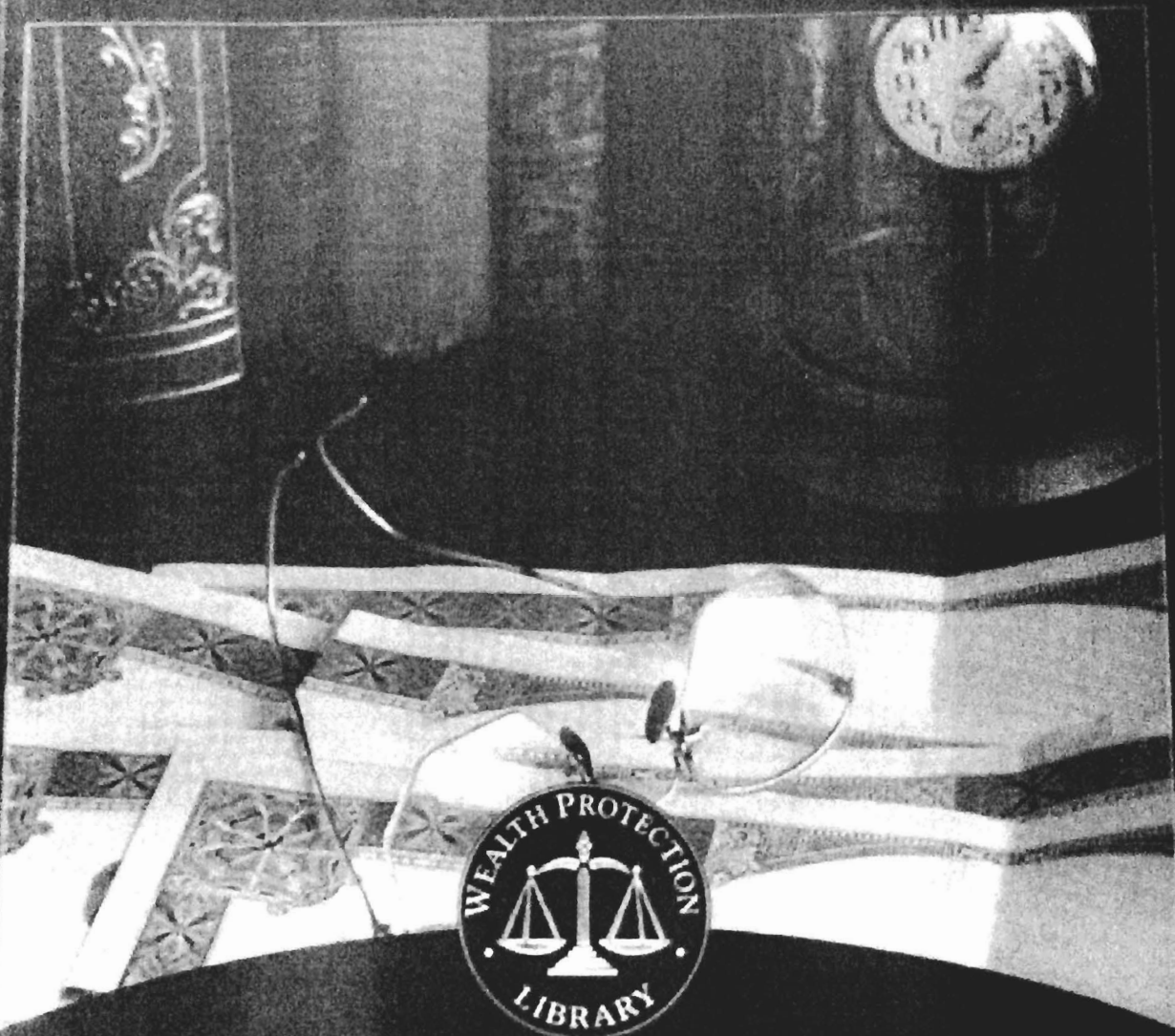
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TRUMP  
UNIVERSITY



DOCUMENTATION  
DYNAMICS

TRUMP 00000012

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**TRUMP**  
UNIVERSITY

# ENTREPRENEURSHIP 101



**How to  
Turn Your  
Idea into a  
Money  
Machine**

TRUMP 00000005

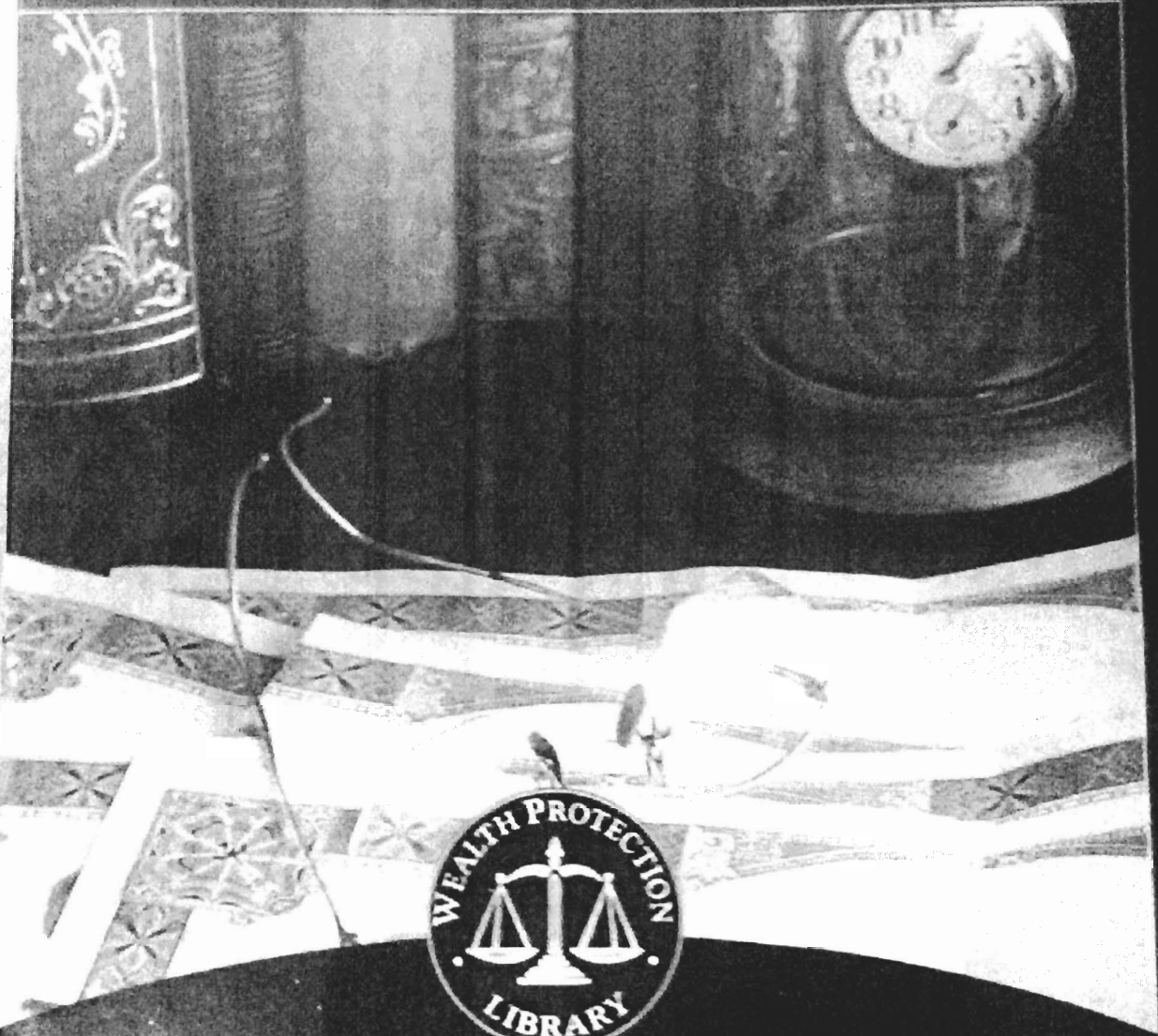
MICHAEL E. GOLDMAN

FORWARD

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TRUMP  
UNIVERSITY



LIMITED LIABILITY  
COMPANIES

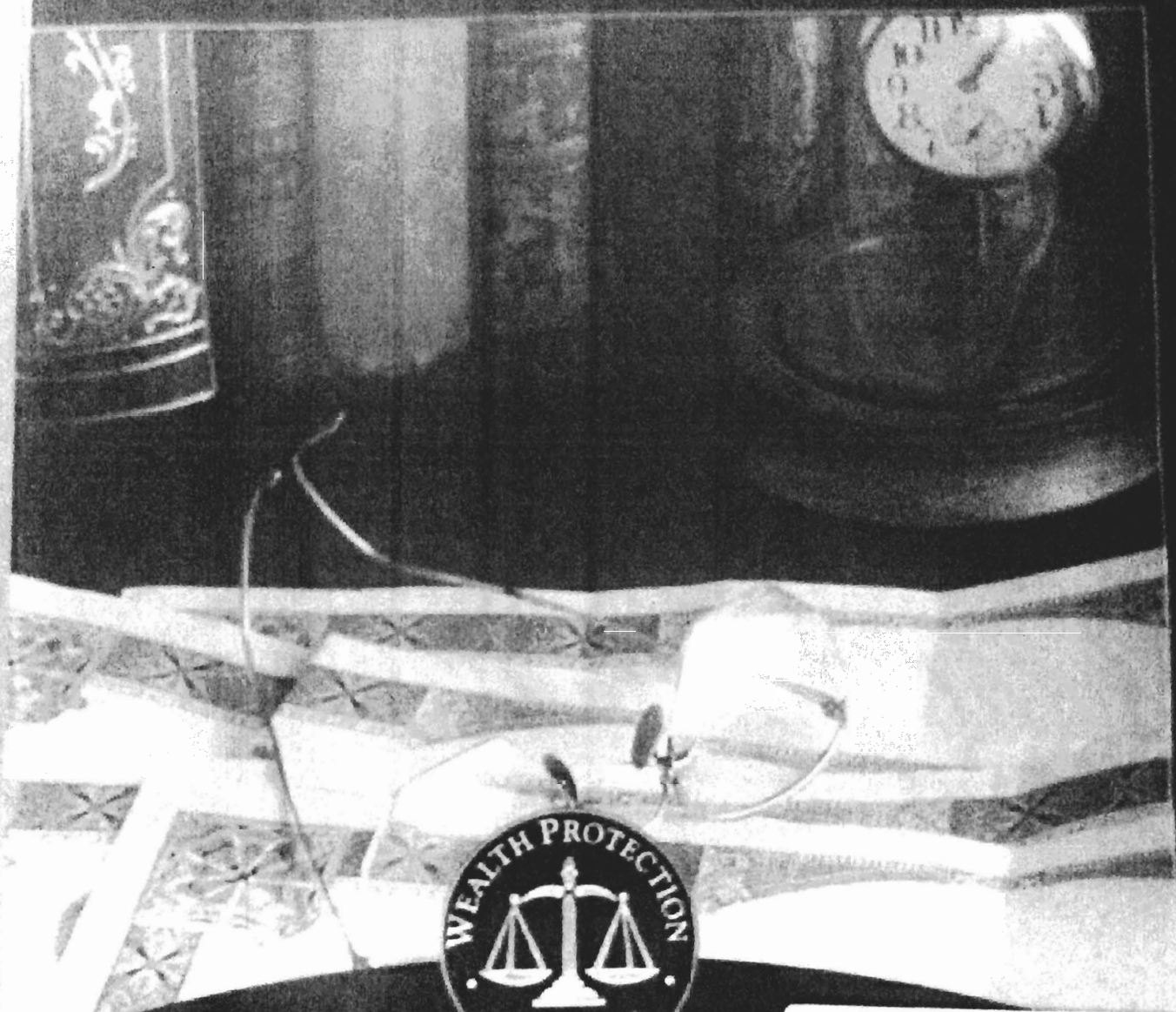
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TRUMP  
UNIVERSITY



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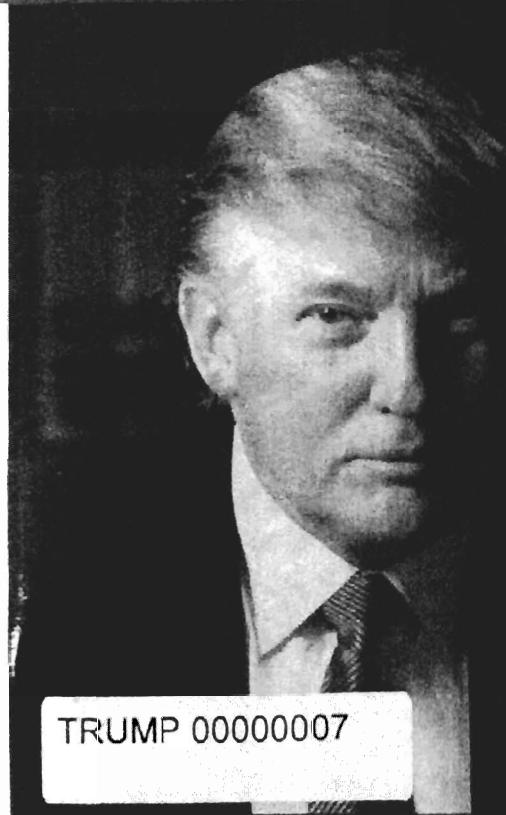
LIMITED  
PARTNERSHIPS





**TRUMP**  
UNIVERSITY

# MARKETING 101



TRUMP 00000007

How to Use  
the Most  
Powerful Ideas  
in Marketing  
to Get More  
Customers

DON SEXTON

FOREWORD BY DONALD TRUMP

000009

# THE MARKETING MASTERY PROGRAM

A marketing program for entrepreneurs and small business owners

## Action Learning Guide

MARKETING ANALYSIS RESEARCH  
SERVICES LOGO  
SEGMENTATION PUBLIC  
BRANDING  
SALES FORECASTING  
FADS MARKET QUOTAS GOODS &  
CONSUMERS ADVERTISING PACKAGING SERVICES  
RELATIONS  
TARGET MARKETING



**TRUMP UNIVERSITY**  
We Teach Success

TRUMP 0000003



**TRUMP**  
UNIVERSITY

# REAL ESTATE 101



**Building  
Wealth  
with  
Real Estate  
Investments**

GARY W. ELDRED, PhD  
bestselling author of  
*Investing in Real Estate*

TRUMP 00000009

FOREWORD BY DONALD TRUMP

000011

*REAL ESTATE*  
**BREAKTHROUGH**  
2009



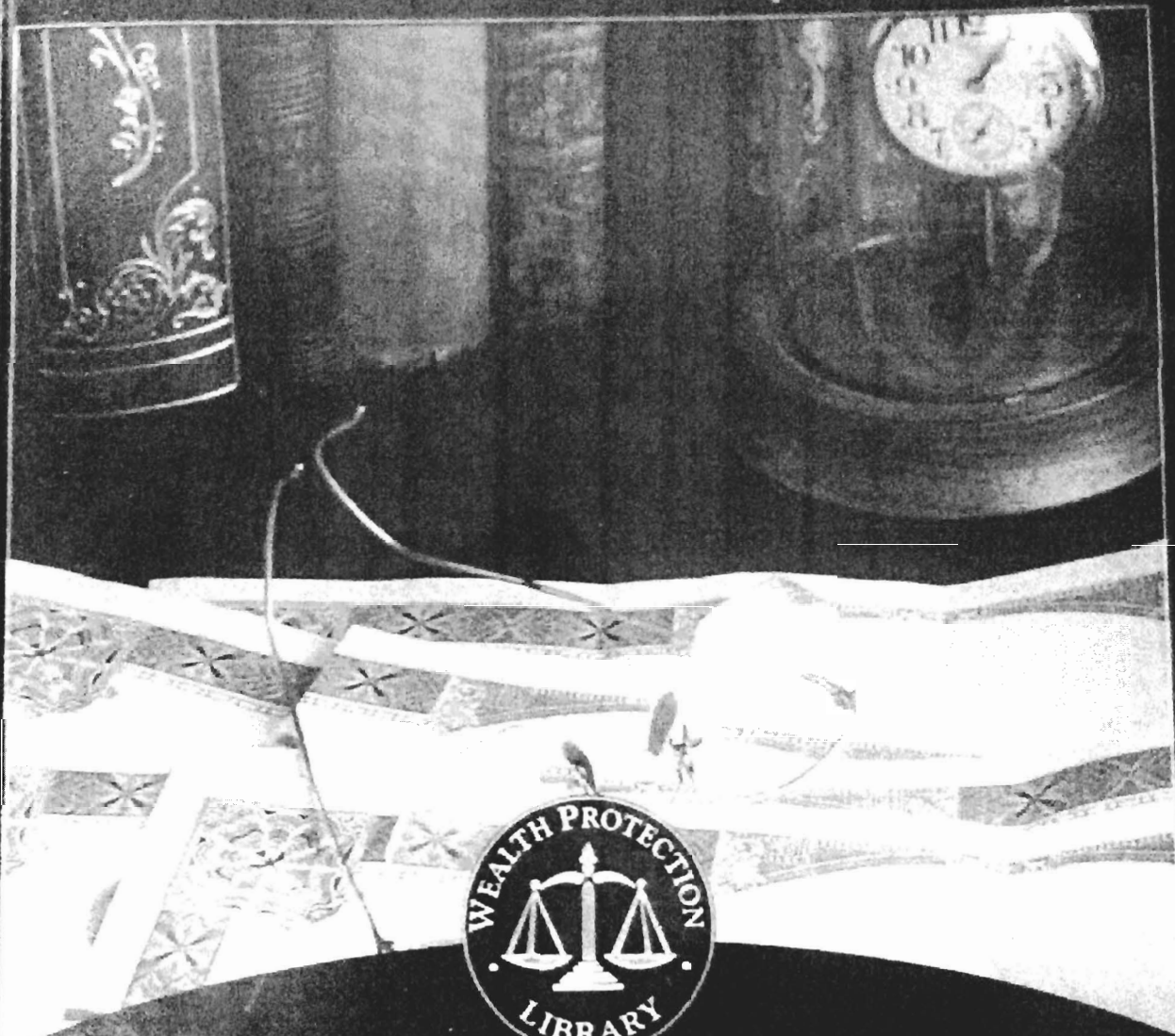
**TRUMP**  
UNIVERSITY

TRUMP 00000021





TRUMP  
UNIVERSITY



RETIREMENT  
PLANS

TRUMP 00000013  
000013

# The Real Estate Investor Training Program

## *Action Learning Guide*

- Find and Purchase Income Producing Properties
- Understand Real Estate Finance
- Negotiate Profitable Real Estate Deals
- Entry and Exit Strategies for Savvy Real Estate Investors



**TRUMP**  
UNIVERSITY

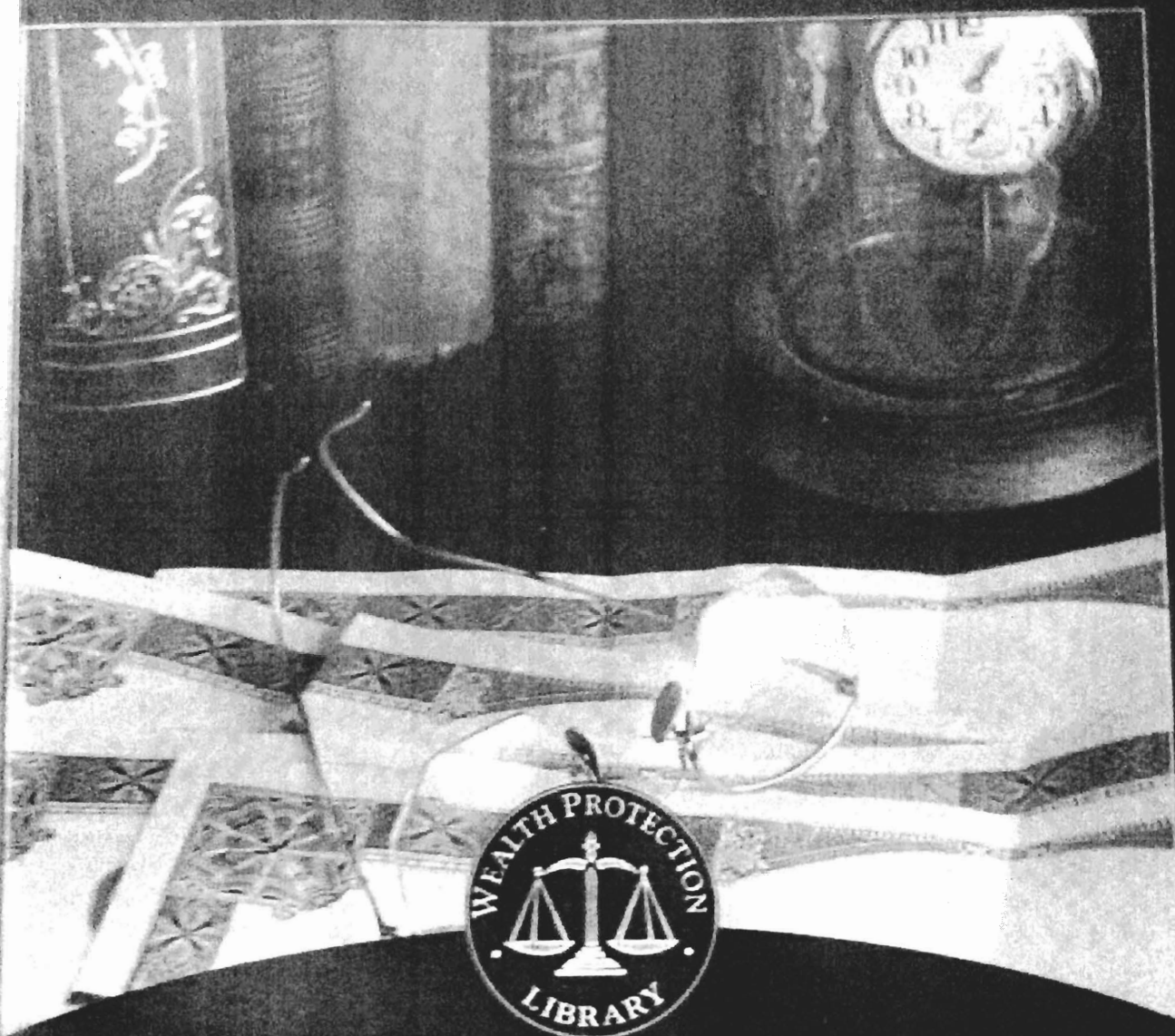
*"If you are going to build wealth you absolutely need to know about real estate." – Donald Trump*

TRUMP 00000002

000014



TRUMP  
UNIVERSITY



TRUSTS

TRUMP 00000015

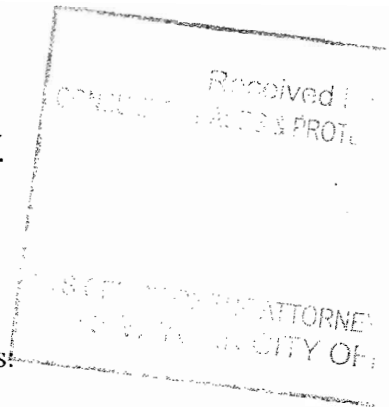
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# Exhibit K1



**AFFIDAVIT OF FRANK ANDERSON**

STATE OF NEW YORK                    )  
  ) ss.:  
COUNTY OF NASSAU                    )



FRANK ANDERSON being duly sworn, deposes and says:

1. I reside at 1319 6th Avenue, New Hyde Park, NY 11040.
2. I make this statement concerning the business acts and practices of Trump University (“Trump”) of my own knowledge.
3. I learned of Trump through an online search for real estate education courses. I gave Trump more credence than other courses I encountered because I believed by being beholden to Donald Trump’s name, Trump would be better than a “no-name” class. I also assumed that it was being offered by the educational division of Mr. Trump’s enterprise.
4. I attended a free seminar in Mar.hattan in May 2010. Bill Cannon, the main speaker, made the presentation sound engaging because of his knowledge and charisma. He provided a bird’s eye view of real estate investment, and pumped himself up to be some sort of real estate demigod. At the time, I thought that with the proper instruction, I could be successful in real estate investment too.
5. Mr. Cannon then pressured us to sign up for a guided bus tour to several foreclosed homes in Brooklyn. The bus tour was supposed to have a real estate agent, mortgage broker, attorney, and contractor on premises to explain how to negotiate deals and calculate renovation costs. He said that after the tour we would know how to itemize renovation costs, broker deals, and make profits. The free session met my moderate

expectations for something free of cost, and so I signed up for the bus tour, expecting Bill Cannon to expand on his presentation then.

6. I paid \$2,995 for the guided bus tour, which picked me up from Melville, Long Island. To my surprise, Steve Gilpin led the tour rather than Bill Cannon, as had been promised. This would prove to be just the start of my frustration with the bus tour.

7. During our stops at foreclosed homes, I felt that I had wasted both time and money. First, the contractor's presentation at each house was useless. He hurled total renovation figures at us without first itemizing repairs or explaining what structural problems the houses had to begin with. We were not provided with sufficient knowledge to identify commonly needed repairs or understand what the next course of action should be in any given situation.

8. Then, there were Mr. Gilpin's impromptu tangents. For example, he would point out buildings with billboard space, and state that billboard advertisements provide a good source of income. Mr. Gilpin never explained, however, how one would go about executing such an endeavor.

9. On the last day of the tour, we were taken to the contractor's home in Brooklyn, apparently to admire the construction work he completed on his home. There was no pedagogical purpose to this exercise or lesson learned; it seemed to have done purely to fill the time.

10. Once we reached our final destination in Long Island, Mr. Gilpin had the audacity to try to persuade me to take personal coaching lessons with him. He said that "every successful athlete has a coach -- take Tiger Woods or Alex Rodriguez for example

-- why wouldn't you?" I told Mr. Gilpin that he was out of his mind to think that I would waste any more money on Trump.

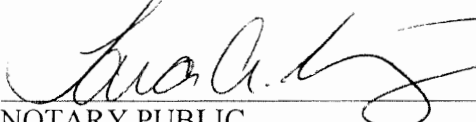
11. I filled out an anonymous evaluation on the last day, and I expressed my discontentment with Trump. I even told Mr. Gilpin personally about how disgusted I was with the entire program.

12. I also made a written complaint to Michael Sexton, the president of Trump, requesting a refund. The New York State Attorney General's Office has been provided with the complaint I emailed Michael Sexton on June 2, 2010.

13. I did not receive a refund nor a written response from Mr. Sexton or anyone else at Trump. Instead, Mr. Gilpin offered me three or four hourly coaching sessions via phone. These phone sessions were also a complete waste. Whenever he actually did answer my calls, I was given no more than thirty minutes worth of basic information and was never actually led through a deal.

  
FRANK ANDERSON

SWORN TO before me this 24<sup>th</sup> day of August, 2012.

  
NOTARY PUBLIC  
State of New York  
My Commission Expires 3/28/13

TARA A. BZEZINSKI  
NOTARY PUBLIC-STATE OF NEW YORK  
No. 01BZ6124377  
Qualified in Nassau County  
My Commission Expires March 28, 2013

# Exhibit K2

**AFFIDAVIT OF FRANK J. APPEL**

STATE OF NEW YORK            )  
  )ss.:  
COUNTY OF ALBANY            )

FRANK J. APPEL being duly sworn, deposes and says:

1. I reside at 126 Haswell Rd., Watervliet, NY 12189.
2. I make this statement concerning the business acts and practices of Trump University (“Trump”) of my own knowledge.
3. I am a retired sergeant of the New York State Police.
4. I decided to sign up for a Trump seminar because it had Donald Trump’s name on it. I associated Donald Trump with quality and excellence and thought he and the products associated with him would be the best of the best.
5. I first attended a free two-hour-long workshop, titled “Fast Track To Foreclosure Investing,” on June 17, 2009, at the Albany Marriott Hotel located at 189 Wolf Road in Albany, New York 12205. At this free workshop, I was told that if I signed up for Trump’s three-day seminar “Profit From Real Estate Investing,” I would learn everything I needed to know about investing in real estate while spending nothing or next to nothing out of pocket. Steve Goff also told the audience that this three-day seminar was so powerful and important, that if we couldn't get the time off from work to attend, we should “call in sick, because you can’t stand your job any way, and you'll make a lot more money with this real estate system than going to your job.”
6. I attended the “Profit From Real Estate Investing,” 3-Day Training seminar on June 26-28, 2009 at the Hyatt Place Saratoga/Malta located at 20 State Farm Place in Malta, New York 12020. My wife and I paid \$1,495 for this seminar.

7. The main speaker at the three-day seminar was Steve Goff, who said that he was hand-picked by Donald Trump to lead the program. He said many times that he was there because he was the best of the best and because Donald Trump, himself a New Yorker, hand-picked only the best of the best to teach in New York. He also said that over the years he had personally made lots of money investing in real estate.

8. In the beginning of the three-day seminar, Steve Goff told us to write a check to ourselves for a million dollars payable three years from the day of the seminar. He told us that within three years we should make a million dollars from real estate investments using the methods we would learn from Trump.

9. On the second day of the three-day seminar, Steve Goff talked about the Trump mentorship programs, but did not tell us the cost of these programs. He promoted these programs by promising that the mentors would hold our hand, teach us everything we needed to know to invest in real estate, and would help us do our first deal. He said that the mentors were very well qualified and made it sound as if they were trained, approved, and hand-picked by Donald Trump himself. He also informed the class that his brother, Chris Goff, also worked for Trump University and was presenting one of the upcoming retreats, titled "Quick Start Real Estate." He also mentioned that Chris Goff not only created, wrote and produced much of the curriculum taught by Trump University but also trained the Trump University mentors how to be mentors.

10. Steve Goff invited to a free lunch anyone interested in the mentorship programs and about half the class attended this lunch. This lunch happened on the second day of the "Profit From Real Estate Investing," three-day training seminar, on June 27, 2009. My wife and I went to this lunch to hear what Mr. Goff had to offer.

11. At the lunch, Steve Goff revealed the cost of the Trump Elite mentorship. In a conversation we had with Steve Goff, he said that if we participated in the \$34,995 mentorship program, he would work with us until we got our initial investment back. He described many scenarios of how we could make \$10,000 or \$20,000 on a deal, stating that \$35,000 would be a drop in the bucket compared to how much we could make from real estate investments using the Trump methods. Mr. Goff made a hard push for the mentorship programs during the second day of the three-day seminar. We did not attend the third day of the seminar due to a prior engagement.

12. Steve Goff assured us that at the end of the three-day course we would be ready to go out and invest in real estate. He really made it sound like real estate investing was easy and doable. However, he said, to be sure of success, we should sign up for a mentorship.

13. I did not think that the three-day seminar provided adequate training for me to do deals independently, and I did not feel that I learned much. I did not have the tools or the know-how to invest. My wife and I signed up for the Trump Gold Elite program on the second day and paid \$34,995 after Steve Goff agreed to be my mentor. He had mentioned that most of the mentors working for Trump University were in it just for the money, and he told us that he was one of the few mentors that truly cared for the people and that he was not in it for the money. He said that even if we didn't make our initial investment back by the end of the year of the Trump Gold Elite program, he would continue to work with us until we got it back and this is the only reason that we signed up for the Trump Gold Elite Program, at \$34,995. I did not want an inexperienced mentor and Steve Goff had repeatedly mentioned that he was the "best of the best" and appeared to be very knowledgeable. I would not have purchased the membership unless he agreed

to mentor me. Steve Goff mentioned that he had a very busy schedule traveling around the country for Donald Trump, presenting this same course I was currently attending, but he would work with me to plan a date to do the mentorship.

14. When signing up for the mentorship, on June 27, 2009, I mentioned to Steve Goff that after the initial free workshop, I thought the \$1,495 fee for the three-day seminar was a lot of money and now, the \$34,995 mentorship fee was an extremely large amount of money that seemed excessive and it was starting to look like every time someone pays them money, they want more and more. I asked him how much the next step in the Trump training would cost me and when, if ever, the fees would stop. He told me that after I purchased the mentorship, I wouldn't need to spend another penny with Trump University to make money buying, selling and investing in real estate because the mentorship program would provide me with everything I would need to be successful.

15. On October 2, 2009, I attended the first day of a three day Trump University "Quick Start Real Estate" retreat, at The Westin New York at Times Square located at 270 West 43rd Street New York, NY 10036. Chris Goff, Steve Goff's brother, was the main speaker and he too mentioned that he was hand-picked by Donald Trump to present at this retreat. At some point during this retreat, I mentioned to Chris Goff that his brother Steve Goff was going to be my mentor. There was mutual discussion about his brother Steve Goff constantly being on the road and that mentoring can sometimes be difficult for him. I asked Chris Goff if he did any mentoring and he said that he did. I also asked him if he might consider replacing his brother Steve Goff as my mentor. He said he would contact his brother, Steve Goff, and get back to me.

16. On November 1, 2009, Chris Goff emailed me about being my mentor and I accepted. I thought that he would be a great choice to learn from, especially since he



was not only a mentor but also wrote some of Trump University's curriculum and trained the mentors at Trump University. I thought his credentials would make him a better choice than his brother Steve as my mentor. Prior to this, I had already attended two retreats in New York City, which were part of the Gold Elite program, and I paid hundreds of dollars per night for hotels and other expenses. There were still two more retreats that I had not attended.

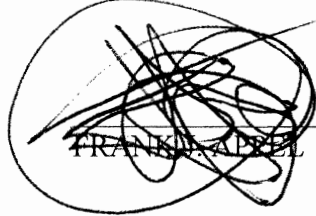
17. On November 21, 2009, Chris Goff flew into Albany to visit me, and starting on November 22, 2009, we spent three days together looking at both foreclosure properties and other properties for sale that I found before his arrival. Chris gave me further instruction on how to buy foreclosed properties and at the end of his visit we agreed that one of the properties we viewed looked like it might be a good investment. After Chris left, a contractor gave me a quote for repairs on that house, similar to Chris Goff's estimate, but I wondered if such an investment was too expensive for me. I relayed this to Chris who said that the house was probably not the best property for my first deal after all. I was disappointed since I spent a lot of time researching this property and Chris himself initially thought that might be a good first investment for me.

18. After that, I called Chris Goff with questions from time to time and he was responsive. I sought out other deals, but none worked.

19. After Trump University broke up, Chris Goff started his own company which had webinars which I attended. I found that in reality, investing in real estate was much more difficult than Trump led people to believe.


20. I do not recall whether I filled out evaluations for the three day course. I gave Chris Goff a good evaluation.

21. I made no investments in real estate but I invested a total of approximately \$40,000 to \$45,000 in Trump, with very little in return.



FRANK ADRELL

Sworn before me this 17th day of August, 2012



Notary Public  
State of NY

My Commission Expires: March 13, 2014

STEPHEN APISA JR.  
Notary Public, State of New York  
Qualified in Albany County  
Reg. No. 01AP6142252  
Commission Expires March 13, 20 14

# Exhibit K3

**AFFIDAVIT OF MARCO BASILE**

STATE OF NEW YORK                    )  
  )ss.:  
COUNTY OF QUEENS                 )

MARCO BASILE being duly sworn, deposes and says:

1. I reside at 25-20 72<sup>nd</sup> Street, East Elmhurst, New York 11370.
2. I make this statement concerning the business acts and practices of Trump University (“Trump”) of my own knowledge.
3. I signed up for the free Trump seminar because I wanted to learn how to make money in real estate, and I believed that Donald Trump might attend the seminar. I was enticed by the respectability of Trump’s name, which was plastered all over the program.
4. At first, I thought that the seminar was part of a university, but when I learned that the location was at a hotel, I realized that it was not a real university.
5. I attended the free seminar at a hotel in New York City, in June 2009. The location had a big poster of Donald Trump. At the free seminar we were told about the three-day seminar for \$1,500, where we would learn about how to make money in real estate through foreclosure and short sales. We were told that after the three-day seminar we would be ready to do real estate deals on our own.
6. The speaker at the free seminar, James Harris, said that he frequently worked with Donald Trump and that Donald Trump had hand-selected him to teach the seminar. He also implied that Donald Trump would make an appearance at the seminar, but he did not.
7. After the free seminar, I attended the Fast Track to Foreclosure 3-Day Training for \$1,495 in July 2009, at a hotel in midtown Manhattan.

8. Steven Gilpin was the main speaker at this three-day seminar. He said he was friends with Donald Trump, that he had experience in doing real estate deals and that he had made millions in real estate.

9. At the three-day seminar, the instructors said that we should increase our credit card limits, because it would be good to have more money available once we started doing deals. However, at the end of the seminar they wanted us to use our credit cards to pay for the next course. I increased my credit card limit during the three-day seminar.

10. The speakers talked about hard money lenders and said that, if we signed up for one of the Trump Elite programs, Trump had lists of people who would invest money with us if we brought them deals.

11. During the three-day seminar, the speakers pulled us aside one-by-one and performed financial evaluations. They said that they were evaluating how much money we could spend investing in real estate, but in reality, they were looking to see if we had enough money to buy the next class at Trump, the Elite membership.

12. The speakers promised that as part of the Trump Elite program, we would be assigned an experienced person who had done many deals in real estate.

13. The speakers also said that Donald Trump was building new condominiums in Florida and that if we enrolled in the Trump Elite program, we would be able to get first picks of these apartments before Donald Trump started to market them to the general public, allowing Trump participants to get these apartments at a bargain price.

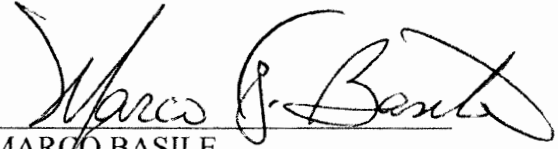
14. I decided not to enroll in the Trump Elite program because it was too much money and I could not afford it. Trump staff was pushing me to enroll anyway and

said that my lack of money was just an excuse and that I should find money to borrow to pay for their program.

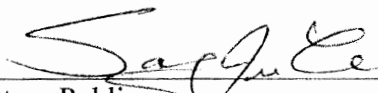
15. I bought a monthly subscription to DealSource, Trump website access, for \$35 per month. This software was supposed to have a list of properties either for sale by owner or foreclosures. I never used this program because the list of properties was never up to date. I called a few properties on that list, and they were not for sale.

16. I had invested in real estate on my own, before getting involved with Trump. By taking Trump courses, I wanted to enhance my knowledge and techniques, but the program did not teach me anything of value.

17. I did not fill out any evaluation surveys.

  
MARCO BASILE

Sworn before me this 2<sup>nd</sup> day of May, 2013

  
Notary Public  
State of NY  
My Commission Expires: Oct 1 2013

SANG IN LEE  
Commissioner of Deeds  
City of New York, No. 5-915  
Certificate Filed in Richmond City  
Commission Expires Oct. 1, 2013

# Exhibit K4

**AFFIDAVIT OF JOHN BROWN**

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

JOHN BROWN being duly sworn, deposes and says:

1. I reside at 120 Cabrini Blvd. #25, New York, NY 10033.
2. I make this statement concerning the business acts and practices of Trump University (“Trump”) of my own knowledge.
3. I became interested in Trump because of Donald Trump’s name and it seemed like an excellent opportunity to deepen my knowledge of real estate. I thought that Donald Trump might be one of the speakers and that if his name was on this program, it had to be legitimate and it had to be great. Donald Trump did not show up at any of the programs.
4. I was also interested in the program because I believed that it would be presented as a “university” with a series of courses and lectures. I thought Trump would teach me everything I needed to know to be successful and make money in real estate investing, and I expected it to help me make enough money to secure a comfortable future retirement.
5. I first attended a free introductory class held on September 14, 2009, entitled, “Profit from Real Estate Investing.” Then, I returned to take a three-day training seminar on September 25-27, 2009, at the New York Marriott East Side. The cost of the three-day seminar was \$1,495.
6. James Harris, the speaker at the three-day seminar, was very motivational. He bragged about how much money he made in real estate. He said he was a consultant



for Donald Trump. We were told that every speaker was handpicked by Mr. Trump. There were pictures of Donald Trump in the room.

7. The material covered during the three-day program was very general. It was not well presented in print. A portion of the seminar was nothing more than a push for participants to sign up for the Trump Elite programs.

8. Part way through the seminar, I mentioned to another participant that the program seemed “shady” and this comment got back to Mr. Harris. After our break, Mr. Harris, clearly annoyed, let the audience know that the program was not shady.

9. Mr. Harris told us to call our credit card companies and request an increase of our credit card limits. He said that this would provide us with more money for investing. A number of people made calls to their credit card companies. I was turned down for an increase in my spending limit.

10. At the end of the three-day seminar, Mr. Harris said that we were now ready to invest in real estate. However, he continued pushing the Trump Elite programs, saying that they would provide us with very detailed information about real estate investing and that we would be working one-on-one with a mentor. He made me feel like if I did not buy the program, I would not succeed. When people said that they did not have enough money to pay for the Trump Elite programs, Mr. Harris suggested using the newly increased credit card limit to pay for it, or to use multiple credit cards. Mr. Harris said that we would be able to make our tuition money back after our first few real estate deals.

11. At the three-day seminar, I purchased Trump Gold Elite Three-Day In-Field Mentorship for \$24,995. I wanted to purchase the \$34,995 package, but I did not have enough money. I used multiple credit cards to pay for the Field Mentorship.

12. I selected my mentor, Steve Gilpin, based on the suggestions of the Trump staff. During the three-day seminar, we were told that he was one of Trump's top mentors. We spoke on the telephone a number of times and Steve taught me some things about real estate based on my questions. If I had no questions, our call was very short. The calls were a disappointment because I felt inadequately prepared to ask questions. I didn't know enough about real estate to ask solid real estate questions. I had a limit of ten calls as part of the Trump Elite program for which I signed up.

13. After a couple of months, at Mr. Gilpin's suggestion, I went to Philadelphia (at my own expense) for two days. Mr. Gilpin, his business colleague, and a real estate agent, Anthony Devoue, took me to see a number of different properties. Mr. Gilpin said that Philadelphia was a hot area for investing in real estate. We saw more than twenty properties. Mr. Gilpin was not personally familiar with the Philadelphia real estate market, but Anthony Devoue, who selected the properties and came with us to inspect them, was very good and professional. Mr. Gilpin walked through each house very quickly and told me all that needed fixing and how much it would cost.

14. The mentorship program was not what I expected from a university. Because the program was called a "university," I expected live training in a classroom setting, like one would have at a college or a university.

15. I did not attend any seminars or retreats as part of the Trump Elite program because I could not afford the \$34,995 program.

16. I filled out evaluations for both the three-day and the Trump Elite programs. I gave Mr. Harris above-average ratings, and I gave Mr. Gilpin a range of marks. Because my ratings for the mentorship were not as high as Trump University wanted them to be, they called me and asked me to change the lower marks to higher

marks. I said that I would change my evaluation only when I was satisfied that I received what I needed to be able to invest in real estate. Trump University called me several times asking that I change Mr. Gilpin's evaluation. I kept refusing, but after several calls I said that I no longer cared and that I just wanted them to stop calling me. Trump then, as far as I know, changed my lower ratings to higher ratings for Mr. Gilpin. But on a scale from one to ten, Trump Elite, for me, was a three or four. The information they provided was basic and mediocre.

17. I complained to Trump about the mentor program and told them that I was not getting out of it what I wanted. I told them that I needed classroom time with instructors. Trump replied that the program might be set up that way in the future, but not at that time.

18. I called and requested a refund after the Trump Elite program because I was not satisfied with the program. Instead of a refund, I got another sales pitch. Mark Covais offered me a chance to take the course again for free with a different instructor. I rejected his offer because I felt that it was going to be more of the same ineffective programs and sessions. Trump University never refunded my money.

19. I am still paying off more than \$20,000 credit card debt incurred as a result of Trump's tuition.

20. I did not make any investments in real estate as a result of Trump. I tried to use some of the Trump principles, but I couldn't remember enough and I was too depressed about not knowing how to be successful to make any deals. I gave up.

21. Because of the Trump name, I felt these classes would be the best, but I came to realize that I was not adequately trained which caused me to feel that Trump University had taken advantage of me.

*John C. Brown*  
\_\_\_\_\_  
JOHN BROWN

Sworn before me this 16<sup>th</sup> day of August, 2012

Notary Public *WMB*

State of NY

My Commission Expires: 3/1/2014



# Exhibit K5

**AFFIDAVIT OF ARLENE COHEN**

STATE OF NEW YORK                    )  
  ) ss.:  
COUNTY OF QUEENS                 )

ARLENE COHEN being duly sworn, deposes and says:

1. I reside at 48 Markwood Road, Forest Hills, NY 11375.
2. I make this statement concerning the business acts and practices of Trump University (“Trump”) of my own knowledge.
3. I learned of Trump through a television advertisement. At the time, Trump sounded appealing because it promised to teach Donald Trump’s method for success in real estate investment, and, of course, Donald Trump made his fortune in real estate. Furthermore, I thought that someone of Mr. Trump’s public stature would only endorse or run a legitimate program. Unfortunately, I was wrong because Trump was a total scam. Clearly, Trump sold his name like a designer sells their logo for profit.
4. I attended the free introductory session at a location near Lincoln Center in April 2010. At the seminar, the speakers pitched the Trump three-day seminar. According to the Trump speakers, investing in real estate was incredibly easy and profitable. They also represented that it could be successfully undertaken on a part-time basis with other people’s money. At the time, it sounded like a good opportunity to make extra income without having to leave my full-time position where I have worked for over 28 years. Thus, I signed up for the Trump three-day seminar to teach me how to invest independently in real estate.

5. I attended the three-day session, paying \$1,495. The session, called “Fast Track to Foreclosure Investing,” was held in Manhattan, at Park Central Hotel in April 2010.

6. At the seminar, there were several speakers, including Gerald Martin and Keith Minchew, who claimed that they personally knew and worked with Donald Trump. The speakers covered a wide array of topics, and overloaded us with information. I felt overwhelmed by the sheer volume of information that was tossed at me, and the lack of clarity. The impression I was given was that, without the assistance of a mentor, I would be unable to invest independently. It was not a course designed to prepare a student without any real estate experience to get started in real estate investment.

7. Furthermore, I realized that the speakers were discouraging questions from students who would challenge them, and were targeting the most seemingly vulnerable students to pitch their mentorship packages to. The entire three-day seminar felt like a sales pitch to pressure students into signing up for the Trump mentorship packages, which ranged anywhere from \$10,000 to \$35,000.

8. I did not sign up for any private coaching with Trump because I believed that even with the assistance of a mentor, I would not be successful at real estate investment on a part-time basis.

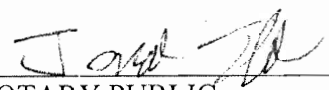
9. I am disappointed that the speakers at the initial free session said that we would learn everything we needed to get started in real estate investment at the three-day seminar, when in fact, we would not. Instead, we realized that we would need to invest more time and money. Trump should have been more forthcoming from the beginning.

If Donald Trump were really involved, I believe that it would have been more up front and all the information would have been out in the open.

10. I did not demand a refund from Trump for the three-day seminar, but I probably should have. At the time, I thought, it was an investment chance that I took. And that I should not have let myself be that vulnerable to the whole sales pitch.

  
ARLENE COHEN

SWORN TO before me this 4<sup>th</sup> day of September, 2012.

  
\_\_\_\_\_  
NOTARY PUBLIC  
State of \_\_\_\_\_  
My Commission Expires \_\_\_\_\_

**JONAH J. COHEN**  
Notary Public State Of New York  
No. 01C00685590 Queens County  
Term Expires August 31, 2013



# Exhibit K6

**AFFIDAVIT OF NELLY CUNNINGHAM**

STATE OF NEW YORK            )  
  ) ss.:  
COUNTY OF RICHMOND        )

NELLY CUNNINGHAM being duly sworn, deposes and says:

1. I reside at 224 Richmond Hill Road, Staten Island, NY 10314.
2. I make this statement concerning the business acts and practices of Trump University (“Trump”) of my own knowledge.
3. I learned of Trump through a mail solicitation. At the time, I needed guidance in handling issues with my real estate investment properties. In 2006, I purchased two buildings that, unbeknownst to me at the time of sale, had not been constructed according to state regulations and thus, could not be granted a certificate of occupancy. This meant I could not legally rent out the apartments to tenants, which put me in a difficult financial situation. Because of the Trump name — and Donald Trump’s status as a real estate tycoon — I believed Trump to be the “gold standard” in real estate investment courses.
4. On March 31, 2010, I attended the free introductory class “Profit from Real Estate Investing” at Affinia Manhattan Hotel, across the street from Madison Square Garden. At the time, it appeared that the speakers had been very successful in buying and selling investment properties at a profit, so I trusted their judgment. We were also told that they worked personally with Mr. Trump, and that we had just missed getting a chance to see him in person. When I heard their pitch for the Trump three-day seminar I was given the impression that I would learn enough to turn around my situation. Thus, I signed up for the program called “Fast Track Foreclosure Investing,” paying \$1,495.

5. On April 9, 2010, I attended the seminar and met the instructors. Initially, I was disappointed that Mr. Trump would not be making an appearance. But, after the main speaker, Gerald Martin, completed his presentation I felt confident that I would become a more knowledgeable investor by the end of the program. Mr. Martin showed us a slideshow of beautiful properties that he had supposedly sold at a profit with the Trump techniques. He also promised to teach us about completing short sales and renting to buy and sell properties.

6. After the presentations, we were assigned to individual mentors to consult privately about the Trump mentorship packages. I explained to my mentor the problem I had with my investment properties, and I emphasized how much of a financial burden the buildings had become. My mentor asked that I explain this to Mr. Martin, who promised that I would be assigned to work with one of the best coaches Trump had, Steve Gilpin. I was assured that Mr. Gilpin had experience in handling issues such as my own, and that my worries would be over soon. Relieved, I signed up for the Trump Gold Elite mentorship, paying \$24,995 in full by check with the last funds in my savings account.

7. I was provided with Mr. Gilpin's telephone number and promptly called him the next day. I explained exactly what had happened with the buildings and he promised to get back to me after he conducted his own research into the matter. Mr. Gilpin called me back within a few days and told me that he was not able to help me with my problem. When I told him that I was considering a lawsuit against the contractors who had failed to provide me with certificate of occupancy for the properties, he became irate. My mentor called me a "suit monger," who simply wants to avoid her contractual obligations. He said that in his experience as a real estate investment banker he had

encountered plenty of people like me — who supposedly, “bite a bigger piece of the pie than can be handled” because we want to live above our means. I felt disrespected, demeaned, and heartbroken by Mr. Gilpin’s comments.

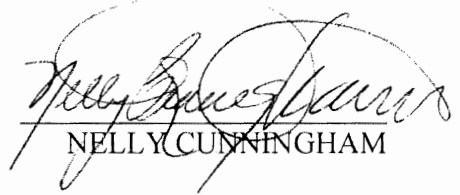
8. I never actually met Mr. Gilpin. My entire “mentorship” with Mr. Gilpin consisted of three telephone conversations, including the brief initial one mentioned above, where I explained my situation. After that initial conversation and two others, I felt that Mr. Gilpin was unprofessional, unhelpful, and did not have the level of knowledge in the matter that I had expected given what Trump had said about him.

9. I contacted Trump to request a refund. Despite my numerous attempts, I never got a refund. Every time I called I was told that it was “too late,” that I only had 24-hours after signing up to cancel.

10. I wrote Mr. Martin a letter via email regarding Mr. Gilpin’s unprofessional attitude and he never responded to it.

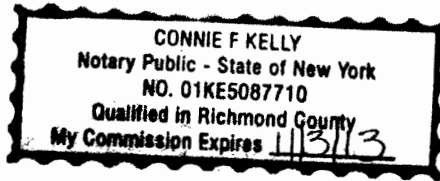
11. I wasted my entire life savings on Trump. I spent \$1,495 on the Trump three-day seminar and \$24,995 on the Trump Gold Elite mentorship package, only to be demeaned and belittled. I feel like such a fool.

12. Trump did not help me with my real estate investment questions. Nor did I learn anything of application to other real estate transactions. My finances deteriorated significantly worsened and I was left insolvent by Trump University.

  
NELLY CUNNINGHAM

SWORN TO before me this 31 day of August 2012.

Connie Kelly  
NOTARY PUBLIC  
State of New York  
My Commission Expires 11/3/13



# Exhibit K7

**AFFIDAVIT OF VINCENT FALKOWSKI**

STATE OF NEW YORK                    )  
  )ss.:  
COUNTY OF NASSAU                    )

VINCENT FALKOWSKI being duly sworn, deposes and says:

1. I reside at 22 Angle Lane, Hicksville, New York 11801.

2. I make this statement concerning the business acts and practices of Trump University (“Trump”) of my own knowledge.

3. I read about Trump in a newspaper advertisement for a free session on real estate investing. My business partner and I decided to attend the free seminar because of Trump’s name and brand recognition. I knew that Donald Trump was a good businessman and thought that a seminar with his name on it would be more professional than it was.

4. I attended the free session at a hotel in Suffolk County in the fall of 2008. After that, I decided to pay \$1,495 for a two-day session (which I now call the “come and get robbed session”), which took place in New York City.

5. We were greeted by Trump University monitors that checked us in and required us to have our photos taken in front of a Trump University sign. When my former partner refused, the Trump staff were somewhat aggressive with him to pose.

6. James Harris was the speaker at the two-day session. He was an extremely smooth operator, very well dressed, flashed his jewelry, and his watch, which he claimed was worth \$60,000. He would have made an awesome used car salesman.

7. During one of the breaks, Mr. Harris told us to get on the phone with our credit card companies to attempt to increase our credit card limits. Mr. Harris said that this would help us do real estate deals with no money down, but I knew that this was

intended for us to pay for Trump's Elite courses. I increased my credit card limit, but I already had a large limit to start with.

8. Mr. Harris also said that we should use hard money lenders to finance our real estate purchases. A hard money lender would be willing to finance a real estate deal with a short term and a higher interest rate. Mr. Harris said that you can build a rolodex of people who cannot buy a home on their own. After finding a house and signing a contract with hard lender financing, you would then find buyers, do a dual closing and immediately pay off the hard money lender. However, I now understand that this technique would not work unless you have a large list of buyers lined up to buy the house. And if you do not find a buyer quickly, you would be stuck paying off the hard money lender with your own money at a higher interest rate and with the house you do not want.

9. The techniques for finding a house for purchase taught by Mr. Harris were for hustlers and involved essentially brute force buying and selling of properties. Mr. Harris suggested that you need to look for a house for sale by owner, preferably by someone who had just lost a spouse, or another vulnerable individual. Mr. Harris stated that you have to point out all of the flaws in the property to lower the sale price to allow for profits to be made after improvements to make the house meet the intended sale value. This would ensure that you buy low and sell high with sufficient profit.

10. Mr. Harris was spending a significant amount of time at the two-day course selling Trump's mentorship programs. He would repeat: "What do you need? You need a mentor." After he announced the cost of the mentorship program, he said that the "bargain" price of \$35,000 was only available on that day, so everyone had to sign up right away or lose the "benefits" of the offer.



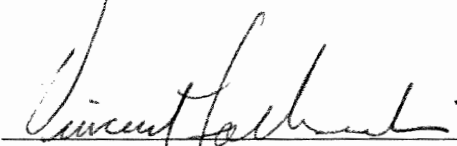
11. I signed up for Trump Bronze Elite for \$10,000, which included two classes for \$5,000 each but no mentor. The two classes – one on creative financing and one on foreclosures – had some content, but definitely were not worth the money I paid for them.

12. During one of the creative finance seminars, a participant stood up, whom I later came to know as Archna Khattar, and addressed the seminar speakers, saying that she did the full mentoring, that their program was a scam and that after going through the entire program, she had not been properly prepared to do the real estate deals. Another participant, Kimberly Crail, later called me to ask for help after she put her entire life savings into the program and walked away from her job to do what Trump taught her in class.

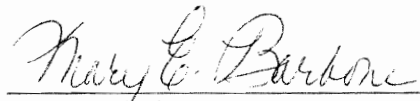
13. I signed up for Trump's software for \$49 per month. The software was utterly useless so I cancelled it several months later.

14. I bought one property in Binghamton with my former business partner. This purchase was procured based on the knowledge that we already had prior to Trump and had nothing to do with the Trump courses or methods because my former partner and I had prior experience with real estate purchases.

15. Trump University was not a university or a college in any way. The techniques used to line Trump's pockets with student money were a scam and in my opinion urged students to borrow large sums of money to finance future classes with the promise of false opportunity and inflated dreams of success. I learned a great deal of information on how to market a service that I would never be able to apply in real life.

  
VINCENT FALKOWSKI

Sworn before me this 17<sup>th</sup> day of SEPTEMBER, 2012

  
Notary Public  
State of NY  
My Commission Expires: 5/31/13

MARY E BARBONE  
NOTARY PUBLIC-STATE OF NEW YORK  
No. 01BA6127940  
Qualified in Suffolk County  
My Commission Expires May 31, 2013

# Exhibit K8

**AFFIDAVIT OF PETER FERRARA**

STATE OF NEW YORK                    )  
  )ss.:  
COUNTY OF ~~KINGS~~ NY            )

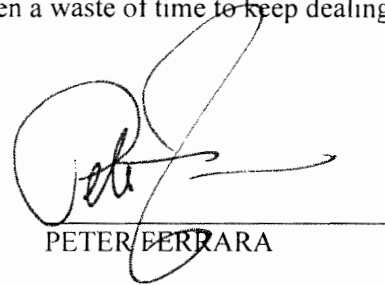
PETER FERRARA being duly sworn, deposes and says:

1. I reside at 2472 Stuart St., Brooklyn, NY 11229.
2. I make this statement concerning the business acts and practices of Trump University (“Trump”) of my own knowledge.
3. I heard about Trump through a radio advertisement and thought that a real estate investment seminar sounded interesting. Unfortunately, it turned out to be a waste of money.
4. I attended the free session in November 2008 and then signed up for Trump's three-day seminar, paying \$1,495. The seminar was called “Fast Track to Foreclosure Investing,” and was held at a hotel in Manhattan in December 2008.
5. I thought that Trump's three-day seminar would teach me how to buy and sell foreclosed homes at a profit. Going into the seminar, I believed that Donald Trump played an active role in designing the program because at the seminar he addressed the audience through a short video clip and his image was prominently displayed at the location.
6. The seminar was not informative and I left after the second day. Initially, Steve Goff and the other speakers made the program sound appealing by saying that we would make a fortune with all the techniques we would learn. But the instructors did not provide any useful information. Instead, they showed slides of different houses throughout the country that they had supposedly bought and sold by using the Trump method. It was, in fact, annoying.
7. By the second day, the instructors began making their pitch for the mentorship program by pairing people with individual mentors. They promised that paying the exorbitant mentorship

tuition would be worth it because you would make the tuition back, plus a profit, quickly and easily. After I told my assigned mentor that I was not interested in paying \$35,000 for the Trump Gold Elite program he said that there was nothing else to talk about then, and so I left.

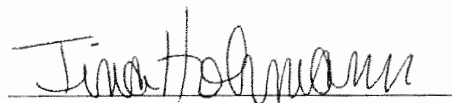
8. I never filled out an evaluation nor complained to Trump about the three-day seminar. I was embarrassed that I had gotten ripped off.

9. I also did not request a refund because it would have been a waste of time to keep dealing with this sham company.



PETER FERRARA

SWORN TO before me this 20<sup>th</sup> day of March, 2013.

  
NOTARY PUBLIC  
State of \_\_\_\_\_ TINA HOHMANN  
My Commission Expires 01/04/2014 ~~Notary Public, State of New York~~  
Qualified in Suffolk County  
Commission Expires January 4, 2014

# Exhibit K9

**AFFIDAVIT OF WILMA FISHER**

STATE OF NEW YORK                    )  
  ) ss.:  
COUNTY OF SUFFOLK                )

WILMA FISHER being duly sworn, deposes and says:

1. I reside at 146 Cayuga Avenue, Deer Park, NY 11729.
2. I make this statement concerning the business acts and practices of Trump University (“Trump”) of my own knowledge.
3. I learned of Trump through a mail solicitation advertising a free introductory session. The course appealed to me because of my general interest in real estate investment and because at the time, I believed that Donald Trump’s name added to the course’s legitimacy.
4. I attended the free introduction seminar at the Sheraton Hotel in New York, NY on May 19, 2008. The speakers shared some money-making strategies, and promised to teach us all that we would need to know for success in real estate investment if we signed up for the Trump three-day program. The seminar seemed like a good opportunity then to refine my real estate investment skill set, so I signed up, paying \$1,495 for the “Fast Track to Foreclosure” program.
5. At the three-day seminar, all of the speakers claimed to be seasoned real estate investors. But despite their self-proclaimed excellence, I did not gain much from the program. The seminar consisted of a few basic real estate investment principles, and a “show and tell” session, where the speakers shared information on all of the properties that they claimed they had bought and sold at a profit.

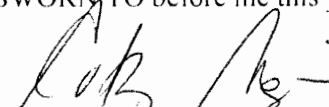


6. Then, the Trump speakers encouraged us to call our credit card companies to request that our credit limits be increased. The Trump speakers said that we would need the extra capital for real estate investment, but in reality they just wanted us to have more money available for their extremely expensive mentorship programs. Those who were successful in having their credit card limits increased were celebrated and cheered by the Trump staff like they had just been inducted into a fraternity. It was ridiculous. I refused to get hoodwinked into believing that the private coaching lessons would be of any value, and I left after the second day of the seminar. I realized that the entire program was a scam, an up-sell to higher priced seminar.



WILMA FISHER

SWORN TO before me this 11 day of May, 2013.

  
NOTARY PUBLIC  
State of New York  
My Commission Expires May 8 2014

COTY NGA  
Notary Public, State of New York  
No. 01-NG 6041369  
Qualified in Suffolk County  
Commission Expires May 8 2014

# **Exhibit K10**

**AFFIDAVIT OF AISHA GARNER**

STATE OF NEW YORK                    )  
  *Westchester*                    ) ss.:  
COUNTY OF ~~NEW YORK~~            )

AISHA GARNER being duly sworn, deposes and says:

1. I reside at 800 Riverside Dr. Apt. 1G. New York, NY 10032.
2. I make this statement concerning the business acts and practices of Trump University (“Trump”) of my own knowledge.
3. I first learned of Trump through an advertisement in the newspaper. The ad alluded to the promise of becoming a lucrative real estate investor using Donald Trump’s method and implied that there might be a chance to meet Donald Trump personally. I was under the impression that because the program bore the name of Trump that there was an affiliation between Trump and Donald Trump.
4. I attended the free seminar at a hotel near Lincoln Center in April 2010. I believed that by signing up for the three-day program I would be able to get started in real estate investment. The instructors promised that by the completion of the program, I would be able to buy and sell pending and foreclosed homes at a profit and know how to bury my liability within limited liability corporations.
5. I attended the three-day seminar at Fordham College at Lincoln Center on the Upper West Side of Manhattan in April 2010, for \$1,495. James Harris, the main speaker, made it seem as if he had amassed an empire from nothing, all by flipping foreclosed homes with the Trump techniques. The other speakers shared similar testimonials about the Trump method. But ultimately, I did not receive any helpful

information at the seminar. I only received a fancy binder with generic information and commentary.

6. Mr. Harris strongly encouraged us to sign up for one of the Trump Elite mentorship programs, and I enrolled along with someone I met at the seminar, Ms. Jasna Sulejmanagić. We jointly split the costs of the \$10,000 Bronze Elite Program. We were told that by joining this very elite group of people we would receive all the help we would need in our real estate investment endeavors. Even though we were dissatisfied with the Trump three-day program, we signed up for the mentorship because we were told that unlike the three-day seminar, the private coaching lessons would be specifically tailored to meet our needs.

7. A few days later, Ms. Sulejmanagić changed her mind about the mentorship program because she had heard negative feedback about it. I initiated my own research into Trump and read many alarming reviews.

8. I quickly decided to call Trump and request a refund for the Bronze Elite Program. I received my money back.

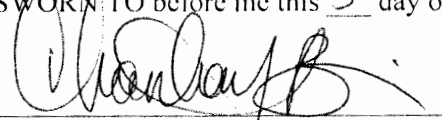
9. I completed the free trial of the Deal Source website for Trump and subscribed to it for a few months. I stopped using it because it contained information I could find elsewhere for free.

10. Overall, the Trump three-day program was structured to be a sales pitch to get people to spend outrageous amounts of money. I am glad that I asked for a refund for the mentorship program. It is unfortunate that I was unable to receive a refund for the Trump three-day seminar.



AISHA GARNER

SWORN TO before me this 3<sup>rd</sup> day of June, 2013.



NOTARY PUBLIC  
State of New York  
My Commission Expires 7/18/15

CHANTAY A. BUIE  
Notary Public, State of New York  
Qualified in Westchester County  
No. 01BU6245005  
My Commission Expires 7/18/15

000060

# Exhibit K11

**AFFIDAVIT OF ROBERT GUILLO**

STATE OF NEW YORK                    )  
  )ss.:  
COUNTY OF NASSAU                    )

ROBERT GUILLO being duly sworn, deposes and says:

1. I reside at 94 Shoreview Road, Manhasset, New York 11030.
2. I make this statement concerning the business acts and practices of Trump University (“Trump”) of my own knowledge.
3. I learned about Trump in September 2009, from a flyer advertising a free seminar. In addition to Donald Trump’s reputation as a successful billionaire real estate investor, the primary reason that my son Alexander R. Guillo and I signed up for the Trump programs, including the Trump Gold Elite program for \$35,995, was the fact that Trump University LLC was organized in New York State and we assumed that we were enrolling in a “university” that was approved by the New York State Department of Education and the New York State Board of Regents. We did not realize that Trump University LLC was not a “university” until it filed a Certificate of Amendment of the Articles of Organization on May 21, 2010.
4. When I later spoke to George Sorial, the Assistant General Counsel of The Trump Organization, on September 20, 2011, he asked me what type of degree I expected from Trump University LLC. I never expected a degree and pointed out to him that in the State of New York there are many colleges and universities that are approved by the Department of Education and/or the Board of Regents that offer certificates and noncredit courses in addition to undergraduate and graduate degrees.
5. My son Alexander attended the free seminar on September 16, 2009, and signed us up for the three-day seminar to take place on September 25-27, 2009.

Alexander paid a total of \$1,495 for the three-day seminar called "Profit From Real Estate 3-Day Training."

6. We attended the three-day session at a hotel in Manhattan. The main speaker was James Harris. Tiffany Brinkman and a few other speakers assisted him. Every speaker gave us a synopsis of their life history, told us how they got involved in real estate and how successful they were. They showed us videos of testimonials of other students who had taken the class and who became successful after implementing the Trump methods.

7. Mr. Harris was an excellent motivational speaker who told his "rags to riches" story. He was flashing his Rolex watch to prove how successful he was.

8. Mr. Harris said that Mr. Trump established a "University" for students who wanted to learn the techniques Mr. Trump used to become a billionaire real estate investor. Pictures were taken of us standing next to a cutout of Mr. Trump.

9. The push to enroll in the Trump Gold Elite program began from the first day. We were told to call our credit card companies during lunch to increase our credit limits, so that we would have enough money to enroll in the Trump Gold Elite program. I did not call my credit card company because I had sufficient credit.

10. During his push to sign us up for the Trump Gold Elite program, Mr. Harris gave us his email and contact information and told us that once we enrolled in the program as Gold Elite Members, he and the rest of the Trump staff would be available to us whenever we needed them for a period of 12 months.

11. Mr. Harris spoke to us one-on-one trying to get us to sign up for the Trump Gold Elite program. He said that if we signed up for the Trump Gold Elite program we would become members of a select "in-the-know group," we would be



“insiders,” and would have access to deals not available to other real estate investors. For example, where Mr. Trump would be involved in building condominiums, we would get the first choice at purchasing an apartment and would then be able to immediately resell it for a profit.

12. Mr. Harris also said that if we signed up for the Trump Elite program, we would work one-on-one with experienced real estate investors who would help us set up a limited liability company and show us how deals are done.

13. At the end of the three-day program, Alexander and I decided to sign up for the Gold Elite Program which included three days of in-field mentorship and five retreats. I paid \$34,995 originally, but I because I was already familiar with one of the seminar topics, Trump credited my card for \$500.

14. Stephen Gilpin was our assigned mentor. He called me to set up the appointment for the one-on-one mentoring session, but I wanted to attend the seminars first to be best prepared for the mentoring session.

15. I attended all the retreats that were offered through Trump Elite. Generally, during the first part of each retreat, the instructor would talk about his successes; one instructor even bragged that he lived in the same community as Tiger Woods. A lot of the information they taught seemed to come from the website zillow.com or could have been easily gathered from the IRS website. After the first seminar, I began to realize I had been taken.

16. The retreats that we attended were designed to get the attendees to pay for additional programs that were offered by the presenters for thousands of dollars.

17. The “Quick Start Real Estate Retreat” offered on October 2, 3, and 4, 2009, was given to solicit another \$995.00 for a “Quick Start Study Group,” which consisted of three group telephone seminar sessions and 15 CDs.

18. The “Wealth Preservation” retreat taught on October 23, 24, and 25, 2009, by J.J. Childers, who claimed to be “Mr. Trump’s Attorney,” was given to solicit another \$9,995 for a Wealth Preservation Program. Mr. Childers was also soliciting customers for his tax accounting firm.

19. The “Creative Financing” retreat offered on January 15, 16, and 17, 2010, by Billy Cannon and Eric Brown was given to solicit another \$4,495 for their “Jump Start Coaching” program. This program consisted of one-on-one coaching by Billy Cannon and Eric Brown on creative financing methods.

20. The “Multi Family” retreat offered on February 12, 13, and 14, 2010, by Billy Cannon and Eric Brown was given to solicit a 3 day one-on-one mentorship for \$19,995 by Billy Cannon and Eric Brown.

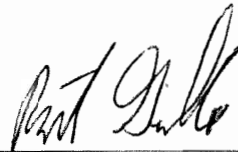
21. At the conclusion of each retreat the presenters asked that the attendees complete a satisfaction questionnaire in order to get a Certificate of Completion for the “course.” They also pleaded for a favorable rating so that “Mr. Trump would invite [them] back to do other retreats.”

22. I filled out favorable evaluations for the speakers because I believed that that was the only way to get my Certificates of Completion for the seminars that I attended. The evaluations did not reflect my actual opinions on the courses.

23. Because I lost faith in the Trump Gold Elite program after taking the seminars, I never did the three-day one-on-one mentorship. I spoke to other Trump students who said that the mentorship was a big joke, and I saw that there were a lot of

complaints filed with the Attorney General's office about Trump and the mentorship program.

24. On August 10, 2011, I wrote a letter to George Sorial, Managing Director of International Development and Assistant General Counsel of the Trump Organization describing my experience at Trump and requesting a full refund. But instead of refunding my money, Trump staff promised to set me up with their best mentor to complete the one-on-one three-day mentorship program. I refused, because I did not feel that there would be any substance to the mentoring session and believed all Trump mentors to be phonies. I still have not received my refund and I have written two more letters requesting it and threatening to file a Consumer Complaint with the Attorney General of New York.



ROBERT GUILLO

Sworn before me this 16 day of August, 2012



Notary Public

State of NY

My Commission Expires: OCTOBER 11, 2015

**SHAUN THOMAS**  
Notary Public, State of New York  
No. 02TH6248670  
Qualified in Nassau County  
Commission Expires October 11, 2015

# Exhibit K12

**Affidavit**

STATE OF CALIFORNIA )  
 ) ss.:  
COUNTY OF SAN FRANCISCO

CYNTHIA M. HAMADA residing at 5758 GEARY BLVD, #219, SAN FRANCISCO, CA 94121  
(Name) (Address)

states that this is a true and accurate copy of the complaint I filed against Trump

University. The complaint accurately describes the circumstances surrounding my

dealings with Trump University. Any copies of correspondence and/or other documents

attached to the complaint are true and correct copies. After the date of this complaint,

I WAS FULLY REFUNDED FOLLOWING ACTIONS TAKEN  
BY NYS DEPT. OF EDUCATION. SEE ATTACHED

Cynthia M. Hamada  
(Signature)

7/16/13  
(Date)

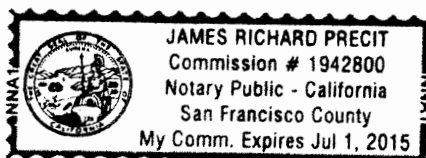
Subscribed and sworn to before me this \_\_\_\_\_ day of \_\_\_\_\_, 201\_\_

\*see right  
Notary Public

State of California, County of San Francisco  
Subscribed and sworn to (or affirmed)  
before me on this 16<sup>th</sup> day of July, 2013, by  
Cynthia M. Hamada

proved to me on the basis of satisfactory evidence to be the person(s) who appeared before me.

Signature [Signature] (Seal)



000068



THE STATE EDUCATION DEPARTMENT / THE UNIVERSITY OF THE STATE OF NEW YORK

Bureau of Proprietary School Supervision  
Investigations & Audit Unit  
116 West 32<sup>nd</sup> Street, 5<sup>th</sup> Floor  
New York, New York 10001

Tel. (212) 643-4760  
Fax (212) 643-4765  
E-mail: Ekramer@mail.nysed.gov  
Web site: www.highered.nysed.gov/bpss

March 31, 2009

Steve Matejek, Controller  
Brad Schneider, Customer Service Director  
Trump University  
40 Wall Street, 32<sup>nd</sup> Floor  
New York, NY 10005

Re: Cynthia Hamada  
File# 0900060

Gentlemen:

On March 9, 2009, Senior Investigator Richard Cohen and I met with you at Trump University (Trump) to discuss the above-mentioned complaint.

As you know, on February 10, 2008, Ms. Hamada signed a contract for a training package with Trump costing \$34,995.00. She made a down payment in the amount of \$5,000.00 with the remaining balance due by February 18, 2008. However, she decided to cancel and formally notified Trump on February 13, 2008, within the time frame allowed by the school. According to the contract, Trump was required to issue a full refund within 10 business days of receipt of the notice of cancellation.

Shortly after faxing her official notice of cancellation, Mr. Schneider called Ms. Hamada and offered her a different training package. Although she wanted to think about it, there was never any enrollment and her cancellation of the original package was not nullified. A few weeks passed before Ms. Hamada inquired as to the status of her refund. At that time, Mr. Schneider told her she was no longer eligible for a refund as she had enrolled over the telephone for the second package. This was not true and Ms. Hamada has been attempting to obtain the refund since that time.

As we discussed during our meeting, Ms. Hamada never signed another contract or attended any further training. She made no commitments to Trump and has patiently tried to get her money back. For more than a year, Trump has retained Ms. Hamada's money despite rendering no services, and has ignored her requests for a refund. This is blatantly unethical, especially during today's financial climate.

000069

I am aware that M s. Hamada has recently been notified that Trump is able to provide her refund as long as she signs a release form. Unfortunately, the release form sent to her does not

state the amount of the refund. Therefore, please furnish her with a release form that clearly indicates the amount of the refund (\$5,000.00) so that this matter can be resolved expeditiously. I cannot close this case until M s. Hamada's money is returned.

If you have any questions, please feel free to contact me.

Sincerely,

Edward G. Kramer

Supervising Investigator

Cc: Carole Yates  
Richard Cohen  
Cynthia Hamada

000070

# Exhibit K13



**AFFIDAVIT OF NORA HANNA**

STATE OF NEW YORK                    )  
  ) ss.:  
COUNTY OF KINGS                    )

NORA HANNA being duly sworn, deposes and says:

1. I reside at 40 Tudor Terrace, Brooklyn, New York 11224.
2. I make this statement concerning the business acts and practices of Trump University (“Trump”) of my own knowledge.
3. I received an email with an advertisement for Trump and became interested in the free seminar because the program had Donald Trump’s name on it. The seminar was called “Profit from Real Estate Investing - Free Introductory Class” and advertised that “you will also receive a free Trump CD-Rom that also includes valuable wealth-building strategies and reports!”
4. I attended the free seminar on November 16, 2009, at the Affinia Manhattan hotel, 371 Seventh Avenue at 31st Street, New York NY, 10001. This free seminar advertised the three-day seminar where we would learn the ins and outs of real estate investment and how to benefit from it. They also made it sound like Donald Trump would be at the seminar to be one of the speakers, mentioning his name repeatedly and saying that we would be learning from Donald Trump and about how Donald Trump made his fortune in real estate.
5. I then signed up for the Profit from Real Estate Investing 3-Day seminar, which also took place in the Affinia Manhattan hotel in New York, on December 4-6, 2009. I paid \$1,495.00 for this seminar.
6. James Harris was the speaker at the three-day seminar. He said that he was Mr. Trump’s “right-hand man.” On the third day we even took a group picture with

Mr. Harris “for Mr. Trump.” Mr. Harris had the audience say with him, “Thank you, Mr. Trump!” Donald Trump’s books and CDs were offered as part of the package and some were sold separately at the seminar. I expected that Donald Trump would make an appearance, because from the first day, Mr. Harris was saying that there may be a surprise from Mr. Trump, but we only saw a video with him discussing real estate.

7. Mr. Harris told us that he was the number one man for Donald Trump for some time and that he learned about real estate investment from Donald Trump himself. Mr. Harris also said that he made money in an off-shore real estate investment and talked about how much money he made in a week. He talked about people who invested very little of their own money in real estate while making large returns, and he put up written testimonials from them.

8. Mr. Harris and other Trump speakers told us to call our credit card companies to increase our credit limits and to lower interest rates on our cards. I called my American Express card and requested an increase of my credit limit. They asked us to order our credit reports to check on our credit score. Also every day we had some kind of homework to look for homes for sale around our neighborhood and on the web. We were asked to order business cards and to start looking for attorneys. I did everything they asked me to do.

9. On the second day of the seminar, Mr. Harris started talking about his investments and how much money he made and that he was willing to share in his investments with a few people from the audience. He showed us photos of condos in Costa Rica, I believe, and another country that I don’t remember the name of. These condos ranged from \$100,000 to \$400,000. and he invited some people to invest with him. All you had to invest 10% down because these condos were selling fast like hot

cakes, he said. He was willing to lend us money as an investor so we could invest in these condos. The photos of these condos were beautiful, with sea views. He also went through the math, saying that if you have \$100,000 to invest, you can invest in so many condos. It really didn't appeal to me to borrow from him, though. I wanted my investments to be in New York City as I had done my homework looking for different real estate properties.

10. Toward the end of the three days, Trump staff said that although information was provided in the seminar, I still needed a coach to help me navigate the real estate market. They said that I was still not ready to do real estate investment on my own and that I needed a mentor to hold my hand. They promised that the mentor would meet with me one-on-one and be at my beck and call and even do one or two deals with me.

11. On the morning of the third day, each student was encouraged to have a one-on-one sales pitch with Jason Schauer for Trump's mentorship program. Mr. Schauer urged me to buy the Trump Gold Elite package for \$35,000, but I told him that I did not have enough money to pay for that. He insisted that I take out a line of credit on my house, and he suggested that I use that money or cash out of my IRA to pay for the Trump Gold Elite program. I refused to do either, and he became frustrated with me. He then suggested that I use my newly increased limit on my American Express credit card to pay for the program.

12. Trump staff said that I would make the Trump Gold Elite tuition back within a month or two after doing just a few deals. I told them that I could pay \$17,000 right there and then, and that I would pay the balance when I made money after closing some deals. They agreed and signed me up for the Trump Gold Elite program on

December 6, 2009. This was at about 10 a.m. on the third day of the seminar, when they were pushing to get students to sign up for the Trump Elite programs. At that point, the people who did not sign up for the mentorship programs were told they could leave right then, and they were each sent off with a bag with a Trump University book, CDs, and a t-shirt.

13. At the end of the three-day seminar, Trump staff asked us to complete evaluations of the seminar. I gave a very positive evaluation, though my impression of Trump was later proven wrong. In the seminar environment, with speakers telling you that you're going to make millions and how easy it is, it was easy to get excited and to think that the Trump speakers and program were excellent. At that point, I thought that Trump would be there for me, that they would hold my hand, and they would make sure that I was successful. This is how Harris and the other speakers presented themselves. Also, the name Trump has a lot of weight, rather than being something unknown. It seemed like these people were truthful and would help us. I would later find out otherwise.

14. Also at the very end of the afternoon on the third day, after I had already signed up that morning, I was assigned my mentor, Mike Dubin. He told me that the best real estate markets at the time were Florida and Las Vegas and that he knew both of them inside and out. I was surprised and put off by this, because I was interested in the New York market, and had already spent a lot of time researching New York properties during the three-day seminar. I was also worried about the much larger costs I would have to incur by traveling to and staying in Florida, and I was concerned that I do not drive. I communicated to Mr. Dubin that my market of interest was New York, but he reiterated that his market was Florida and so that is what we would research. I told him that it

would be difficult and expensive to look for a realtor, property manager, various licensed contractors such as electrician, plumber, etc., and a real estate attorney in Florida, but he told me that I was not looking at the big picture and that once I made my money from deals these costs would be trivial.

15. At the time I signed up for the Trump seminar, I was a licensed agent with Primerica Financial Services, working for them as an independent contractor on an occasional part-time basis. I had to be in compliance with various internal policies to ensure that I did not lose my Securities license. On Monday, December 7, 2009, the day after I signed up for the Elite program, I called Primerica's compliance department and inquired whether I could participate in Trump's mentorship program.

16. The next day, Tuesday, December 8, 2009, Primerica's compliance attorney informed me that I should not participate in the Trump program, about which they had never heard, because I could lose my connection with Primerica as well as my licenses. I called Trump University immediately and left voicemail messages for Jason Schauer and Tiffany Brinkman, explaining the situation and asking them to cancel my enrollment. I asked for a refund because I was cancelling within 48 hours after I signed up for the program, which is what I was told was Trump's cancellation policy.

17. Trump made it very difficult to cancel my enrollment and to receive my refund. I called Mr. Dubin, my mentor, who told me that he was not the right person to cancel my enrollment. I then called several other individuals at Trump, including Jason Schauer multiple times, left voice messages and sent emails. I was leaving messages for Jason two or three times a week, as well for Tiffany Brinkman.

18. On Thursday, December 10, 2009, I called American Express to stop the charges at once since there was a chance of problems with Primerica Compliance. I was

told that the money was charged and taken out on Wednesday, December 9, 2009. I asked American Express to send me a dispute form as I had requested cancellation within 48 hours from signing the contract. A few days later I received the papers from American Express, filled them out and mailed the dispute forms with a copy of the receipt, as they requested.

19. On Friday, December 11, 2009, I sent a text message to Tiffany Brinkman a couple of times and left her multiple messages. Finally I was able to talk to Tiffany and told her my situation and she told me, "I cannot help you. I am at the airport going to do another 3-day seminar. You need to call Jason and speak to him."

20. Mr. Harris called me the following week and spoke to me about my fears and my rights as a citizen, saying I could do whatever I wanted and what Primerica Financial Services was doing was illegal. I told him that maybe it was my fault, that I should have checked first with Primerica before attempting any real estate investment. It went on back and forth and I finally told him, "NO I want out. Please refund me all my money as I have raised this issue within 48 hours from signing up." Also, I told him that I had refrained from accessing their website and I was ready and willing to go to Trump Corp in NYC and drop the package myself as I had no use for it. He told me that I was making a huge mistake and that I needed to speak to Jason.

21. Mike Dubin then called me to finalize my travelling arrangements as if nothing ever happened. He ignored that I had opted out and was no longer interested. He said that no one had informed him that I wanted out and that he had blocked the time to work with me in Florida. Of course I declined and told him the story of what had happened. He told me to speak to Jason.

22. I continued trying to reach Jason Schauer. Each time I used a different phone number to call him from. I used my unpublished number at home, my cell, and my business phone, which is a Toll Free number, using \*82 and \*83 to hide and show my numbers. Each time I left voice message after voice message, but I received no answer from Jason. I called him 2 to 3 days per week to no avail. A couple of weeks passed by, and I was visiting a friend. I used her phones to call Jason (area code 347 and 646). To my surprise Jason picked up the phone! I told him that I had left him over 30 voice mails, which he never returned, and I told him that he had to settle my situation once and for all. He told me he had been very busy and my fears were unfounded. "We are in America we can do what we want with our money," he told me. He said he did not understand why Primerica had told me I could not enroll in the Trump University program. I insisted that my decision to cancel was final. I had called within 48 hours of signing up, and even after the 48 hour cancellation period, I had been told at the three-day seminar that the Gold Elite program had a 30-day money back guarantee. "So where do we go from here?" I asked him. My feeling is he picked up the phone since the area code was completely different, because he was shocked that I was on the other end. He seemed to be at a loss for words.

23. At that point, I threatened to call the New York Attorney General's office to dispute Trump University's business practices and to have them handle the situation. Only then did Jason say that he was about to go into a meeting where they would address my situation and that I should call him back in two hours. After two hours I used my friend's other cell with a different area code and called Jason. Again Jason seemed shocked and said, "We've decided to refund all your money, and you can keep the

software package, although I know you are making a mistake.” He gave me the phone number for the accounting department and told me to call them.

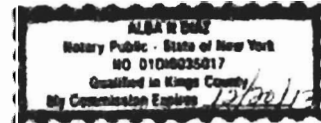
24. I called the accounting department right away to make sure I would receive my money back. I believe I called them three times because they told me it would take two weeks for them to refund my money. Finally I was told that it was processed and that the money was refunded to Amex. I called Amex and asked to see if the refund was reversed. I was told to wait 3-5 business day and call back, which I did. Finally, I was totally relieved when calling Amex and they told me they saw the refund and I had a zero balance.

25. By this point, it had taken Trump nearly *two* months to cancel my enrollment and to refund my money, despite my calling them within 48 hours after registration.

Nora Hanna  
NORA HANNA

Sworn before me this 12 day of July, 2013

Alba R. Diaz  
Notary Public  
State of NY  
My Commission Expires: 12/20/13





# Exhibit K14

**AFFIDAVIT OF JUNE HARRIS**

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

JUNE HARRIS being duly sworn, deposes and says:

1. I reside at 55 North Broadway 1-11E, White Plains, NY 10601.
2. I make this statement concerning the business acts and practices of Trump University (“Trump”) of my own knowledge.
3. I learned about Trump’s live seminars after receiving an invitation in the mail to attend one with a guest. Before that, I had taken Trump’s online real estate investment course with Professor Gary Eldred called, “Find and Purchase Income Producing Properties.” My experience with that seminar was a positive one, so I held high expectations for a live Trump course. Additionally, I had some trust in the program because it was run by Donald Trump, a billionaire who owed his monumental success to real estate investment. While I was not under the impression that Mr. Trump would be making an appearance, I was led to believe that the lesson plan for the seminar included his input and that, based on Trump’s marketing materials, the course professors had been handpicked by Donald Trump. It was also my expectation that I would be receiving organized, classroom-style instruction from a professor, since the program used the term “university” in its title.
4. I attended the free seminar in June 2009 at the Marriott hotel in downtown Stamford, Connecticut. At this initial session, the speakers encouraged those of us who were “serious about making money in real estate investment” to sign up for the three-day seminar Trump was offering, called “Fast Track to Foreclosure Training.” There, we

were advised to keep \$1,000 cash in our wallet at all times as a “confidence builder for wealth.” Many people left after Trump announced the fee for the three-day seminar. The speakers spoke disparagingly about those who left early and acted very chummily with the prospective mentees.

5. We were told that in addition to providing us with thorough instruction on real estate investment, we would have access to twelve months of assistance in locating properties with a live expert available to take phone calls seven days a week. It sounded like a valuable investment, so I signed up for the three-day seminar. Since I had paid the \$1,900 fee for the online Trump course, I was offered a discounted tuition rate of \$747.50, which I paid. The session was held at a hotel in Stamford, Connecticut on the weekend of June 19, 2009, and the main speaker was Gerald Martin.

6. At the seminar, the instructors represented that they had purportedly made many lucrative deals using the Trump method. They also made many self-serving statements about their supposed success in real estate investment.

7. As part of our assignment, we were instructed to bring property listings with us to class for the purpose of observing the instructors negotiate with the sellers. At this time, we were given access to Trump’s exclusive online real estate listing service to locate properties. When I attempted to use the service, I was told that I would only be permitted to use it at no additional cost for one week. To my dismay, I learned that I would have to pay a monthly fee thereafter, and that I was mistaken in believing that the seminar included such a service.

8. During the seminar we were asked to list our existing lines of credit and encouraged by the instructors to call our credit card companies to request increases on

our lines of credit for our credit cards. They said that we should invest in property without ever touching our own assets. The instructor said if we surmounted the fear of losing money then we would actually make money. I did not request credit limit increases on any of my credit cards, because after working at a financial institution for several years, I knew that doing so would be ill-advised, because such requests can hurt a person's credit score.

9. On the last day, the instructors strongly advised us to enroll in a more advanced Trump Gold mentorship program. They said that it would be the only way to succeed in real estate investment. Mentees were promised the assistance of an expert's private in-field sessions to guide them through every step of a deal. Because I did not disclose my lines of credit, I was not taken aside to discuss the mentorships one-on-one with a Trump representative. Some of these services were part of what I thought I was paying for at the three-day seminar, so to learn that I would need to pay more money to receive what I had already been promised infuriated me.

10. Weeks later, I received a call from Trump and was offered a discount on their private coaching sessions. The agent gave me a deadline to consider this seemingly exclusive offer of \$3,500 for their one-on-one guidance to becoming a successful real estate investor. I said I would discuss it with my husband first. At that deadline, the Trump agent called and I told him that I was unable to afford the mentorship because I needed to keep enough money readily available to make payments on my daughters' college tuition. The agent was very upset and quickly hung up the phone on me. I was never contacted again by Trump after that call.


11. Looking back I wonder if their offer was so lucrative, and if we were being assured a huge income opportunity, why was there never any effort to work out a payment plan or payment settlement from the first successful deal.

12. I did not complete an evaluation survey for the Trump program as I did not feel that it measured up to what was promised. I still have the blank evaluation form in my possession.

13. By the end of my experience with Trump, it was obvious that Trump was only interested in getting more and more money out of people, no matter the cost or the hardship to the student.

  
JUNE HARRIS

SWORN TO before me this 11th day of September, 2012.

  
NOTARY PUBLIC  
State of New York  
My Commission Expires 11/05/2015

**JANE ROMERO**  
Notary Public, State of New York  
No. 01RO6176895  
Qualified in Westchester County  
Commission Expires Nov. 5, 2015

# Exhibit K15

**AFFIDAVIT OF ROBERT JONES**

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

ROBERT JONES being duly sworn, deposes and says:

1. I reside at 90 Rockledge Ave., Mt. Vernon, New York 10550.

2. I make this statement concerning the business acts and practices of Trump University (“Trump”) of my own knowledge.

3. I received a flyer in the mail about Trump’s free seminar in July 2010. I became interested in the seminar because it carried Donald Trump’s name and claimed good business opportunities with relatively little capital investment.

4. I attended the free Trump seminar on July 31, 2010, at the Roosevelt Hotel on 45th Street in New York City. At that seminar I signed up for Trump’s Real Estate Investor Blueprint program, a three-day session, for \$1,495.

5. I attended the three-day session on August 13-15, 2010, at The Westin Hotel at Times Square in New York.

6. The primary speaker was Gerald Martin from Orlando, FL. He claimed he had 13 years of experience in real estate and 8 years teaching it. He specifically stated that he and other speakers at the 3-day session were personally successful at implementing and carrying out the strategies that we were going to learn at Trump. *Once* *AJS* of the other speakers was Stephen Gilpin, who was also the leader of our market tour that was held on the second day.

7. At the three-day seminar the speakers discussed how to make money from distressed real estate. While they provided relevant information during the seminar, at one point we were given some incorrect information. We were told that if we assigned to

someone else a purchase contract for a house, the profit could be classified as a capital gain. We were also told to make the assignment payoff check payable to our corporate entity and not to our name to avoid being treated as a real estate dealer by the IRS and taxed as ordinary income. I checked with an accountant and this was completely inaccurate; this would actually be classified as ordinary income and not as a capital gain.

8. During the three-day seminar, there was very strong pressure to sign up for one of Trump's mentorship programs. Towards the end of the course, the speakers told us to increase our credit card limits so that we could use our credit cards to pay for the advanced Trump Elite course. I thought that suggestion was crazy and did not understand why they would be selling us a \$25,000 course. The speakers said that we would be able to make that money back within three to six months from all the real estate deals we were going to do. They presented examples of people who used the Trump methods to close deals and shared the amounts of money these people made. They made it appear that if you used the methods taught in the Trump course, you would be able to do successful real estate deals.

9. During the third and final day of the seminar, the speakers said that without taking the mentorship program, it was very unlikely that we would be successful in executing the strategies taught in the three-day course. They strongly encouraged us to borrow the money if needed and specifically said "If you can't make money without money, you can't make it with money." I was extremely disappointed that they did not disclose this information about the mentorship program upfront, during the first or second day of the seminar when you could still cancel and get your money back. This was a big turn off.



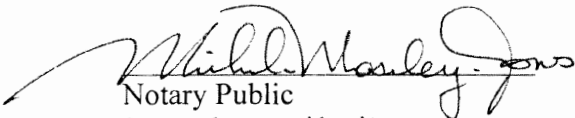
10. I did not sign up for a mentorship program because I felt that I learned enough during the three-day course to attempt to execute a deal.

11. After the conclusion of the course, I started looking through leads on foreclosed properties in the pipeline, trying to propose deals both to property owners and potential buyers, using the methods I was taught by Trump. But I was not able to close any deals. I spent three months (up to 40 hours per week for the first 6 weeks) searching for properties and trying to do a deal, but I did not get sufficient results to continue.

12. I filled out the evaluation for the Trump three-day course. I don't remember exactly what my evaluation ratings were on the 1-to-5 scale they used, but overall the evaluation was probably positive because my comments were about the speaker at the seminar, and not at Trump's attempts to get the participants to pay out more money for the next course.

  
ROBERT JONES

Sworn before me this 20<sup>th</sup> day of August, 2012

  
Notary Public  
State of New York  
My Commission Expires: 9-18-14

**MICHELE MOSELEY-JONES**  
Notary Public, State of New York  
No. 02MO6152595  
Qualified in Westchester County  
Commission Expires Sept. 18, 2014

# **Exhibit K16**

**AFFIDAVIT OF MATT LANDO**

STATE OF NEW YORK                    )  
  ) ss.:  
COUNTY OF SUFFOLK                 )

MATT LANDO being duly sworn, deposes and says:

1.       I reside at 16 Sparks St., Melville, NY 11747.
2.       I make this statement concerning the business acts and practices of Trump University (“Trump”) of my own knowledge.
3.       I learned about Trump after receiving an invitation in the mail to attend a free Trump seminar. The promise of earning extra income and learning more about making profitable real estate investments from none other than the business savant, Donald Trump, appealed to me.
4.       I attended the advertised free seminar at a hotel in Long Island in May 2008. The Trump speaker described himself as a real estate investment expert, and it seemed believable when he shared a few money-making investment strategies for success with foreclosed homes and rental properties. He also made signing up for the Trump three-day seminar sound like a worthwhile investment when he promised to teach us even more sophisticated real estate investment techniques. So I signed up for the seminar, paying \$1,495.
5.       I attended the three-day seminar at a hotel in Midtown Manhattan in May 2008. The program covered the surface of important topics in real estate investment without exploring them to the extent necessary to have permitted me to start investing on my own. Instead, the Trump speakers pitched more courses and mentorship programs. The students were also asked to call their credit card companies at lunch and request

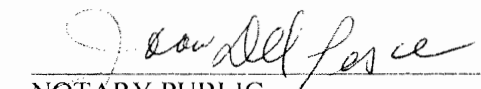
credit limit increases on their cards. The Trump instructors claimed that people are generally unaware of how simple it is to obtain capital for investment, and that such requests would actually improve one's credit score. According to the speakers, the higher one's credit limits were, the higher one's credit score would be. Believing these claims, I called my credit card companies and requested to have the limits raised on my credit cards.

6. While I was not pulled out of the audience to sit privately with a Trump mentor, I did approach one to ask a few questions. The mentor encouraged me to sign up for a Trump Elite mentorship program, but I declined. He assured me that I should not worry about the tuition costs because I would certainly make it back with the proceeds from my first deal. Again, I was suspicious. I felt that three days of mentorship, no matter how intensive, would not be enough to help me make the lucrative real estate deals that they promised.

7. By the end of the program, I felt that I had overpaid Trump for superficial, generic commentary on real estate investment. The three-day seminar was not worth \$1,495. It was simply a vehicle to recruit more students to sign up for additional courses and mentorship packages.

  
MATT LANDO

SWORN TO before me this 17 day of May, 2013.

  
NOTARY PUBLIC  
State of New York  
My Commission Expires June 30, 2015

JOAN DEL PESCE  
NOTARY PUBLIC, STATE OF NEW YORK  
NO. 0912760  
QUALIFIED IN NASSAU COUNTY  
COMMISSION EXPIRES JUNE 30 2015

000091

# **Exhibit K17**

**AFFIDAVIT OF KATHLEEN MEESE**

STATE OF NEW YORK                    )  
  )ss.:  
COUNTY OF SCHOHARIE            )

KATHLEEN MEESE being duly sworn, deposes and says:

1. I reside at 613 Sunnyside Road, Schoharie, New York 12157.
2. I make this statement concerning the business acts and practices of Trump University (“Trump”) of my own knowledge.
3. I received an invite in the mail in June 2009, from Trump for a free two hour seminar in real estate at the Palace Theater in Schenectady. At that seminar, we were told that if we signed up for Trump’s three-day seminar, we would learn everything we needed to know about investing in real estate and about how to buy and sell real estate using other people’s money. We were also told that at the three-day seminar we would get to have our pictures taken with Donald Trump. It ended up being a cardboard cutout of Mr. Trump.
4. I attended the three-day seminar at Hyatt Place Saratoga/Malta, 20 State Farm Place, Malta, New York, 12020, for \$1,495.
5. Steven Goff was one of the speakers at the three-day seminar. The other two — Tiffany Brinkman and Scott Leitzell — did not speak as much. Mr. Goff said that he was trained to teach our seminar by Donald Trump’s main real estate advisor. He also told us that he started out with nothing and had no money before he began buying real estate using Trump techniques. Mr. Goff said that Mr. Trump “handpicked” him to teach the session because he had worked with Mr. Trump before through his brother Chris Goff. He also said that New York was Mr. Trump’s home state and he would never send

anyone other than the best of the best to teach there, and that he, Steven Goff, was the best of the best.

6. Mr. Goff made you feel that Donald Trump was going to review everything that was taught during the program.

7. I thought we were going to learn everything we needed to know about buying and selling real estate at the three-day seminar. However, the information Trump provided was very vague and did not prepare me to invest in real estate on my own. Trump staff gave us the pitch about going the extra mile and enrolling in the Trump Elite programs, because “Donald Trump will not steer you wrong and that is how he made his money.” They also said that Donald Trump sent them to teach the seminar because Mr. Trump is trying to help us make money.

8. While the other Trump instructors spoke to the class, Mr. Goff pulled people aside one by one and told us that we would make money faster if we enrolled in Trump Elite programs and worked with a personal mentor. Mr. Goff asked me if I could come up with \$25,000 to sign up for the Gold Elite Program. I told him that I had a credit card with a \$30,000 limit, but I did not want to pay that much for the Trump Gold Elite program.

9. I told Mr. Goff that I could not fly to the Trump Elite seminars because I have a son with Down 's syndrome and a protein deficiency who needs to be close to the hospital in case he needs to receive his medical treatments. Mr. Goff told me that I had to sign up for Trump Gold Elite for \$25,000 to help my family. He said he had a son, so he knew how family meant everything to me. He said that I had to find resources to invest in my future, promised to personally work with me, and guaranteed that I would make my \$25,000 back within sixty days.

10. Mr. Goff told us to write a check to ourselves for \$1,000,000 payable three years from that day, saying that we will be able to cash it then with the profit from our real estate investments.

11. During the seminar, one of the homework assignments required everyone to bring to class a list of properties for sale in our area. Mr. Goff was going to call the contacts for those properties and negotiate deals with them over the phone for the whole class to hear. However, he told the whole class that he was going to work with me personally on the properties that I found. I did not sign the agreement to enroll in the Trump Elite program until Mr. Goff told the class he was going to work with me personally.

12. Mr. Goff also promised to send me a work plan that he designed, supposedly worth \$5,000, for free, but when I received it, it turned out to be the same kind of material we were taught in the three-day seminar.

13. Because Mr. Goff promised to personally work with me, I bought the Trump Gold Elite package for \$25,000. However, I called him in three days, the last day I could cancel the program, and told him that I could not go through with the program and could not spend that money on Trump. Mr. Goff reassured me and reiterated his promise to work with me personally. He said that he was not going to let me quit, that he knew I was scared, but that I shouldn't be because he was going to be there working with me every step of the way.

14. Mr. Goff called me in a few days, when it was already too late to cancel the mentorship program, and told me that instead of coming to work with me personally, he was sending another mentor, Medith Webb. All I was told about Mr. Webb was that he was hired by Trump as a mentor and he was from Oklahoma City.



15. Mr. Goff also promised to call the owners of the properties that I gave him during the three-day seminar, but he never called anyone. I checked with the owners and they have never heard from him or anyone from Trump.

16. I wrote a letter to Steven Goff and sent it to Trump before Mr. Webb arrived for our mentorship session. I demanded my \$25,000 back because Mr. Goff lied to me — he never called any of the property owners and he was not working with me personally as promised. I received a call about my letter from Jason Schauer at Trump and I re-iterated to him what I wrote in the letter to Trump.

17. Because of the confusion before Mr. Webb's rushed arrival to New York to work with me, Mr. Webb and I ended up looking at some rental properties that were not for sale. Mr. Webb talked to the owners so that I could see how to talk to people about properties, what to ask, and how to negotiate. Mr. Webb asked me to give him a good evaluation, and I did because he did what Mr. Goff told him to do and was a nice man.

18. Mr. Webb said it was his fault I wasn't prepared for our meeting, and that he had never mentored anyone on such a short notice as usually mentees need time to prepare. I told Mr. Webb that Mr. Goff sent him so fast because I wanted my money back. I told Mr. Webb that Mr. Goff lied about everything and that I was still dissatisfied with Trump because Mr. Goff promised to personally help me and he did not keep his promise.

19. As part of the Gold Elite program, I was promised a lifetime membership with Trump, unlimited phone calls to Mr. Goff, to my mentor and others at Trump, including Tiffany Brinkman and Jason Schauer, access to website seminars, webinars, real estate leads, and legal forms for life, but nothing is available any longer. Trump

speakers and mentors all gave me their phone numbers, but none of them work at Trump any more, and I have not been able to get in touch with anyone after I signed up for the Trump Gold Elite program. In December 26, 2010, I received an automatic email that said that I would no longer have access to the foreclosure sites. Jason Schauer is no longer working at Trump and none of the other phone numbers work.

20. I was unable to get my refund and am still paying off debts from my Trump tuition. Donald Trump received \$25,000 of my money. For my \$25,000, I have a lifetime membership to nothing! No one contacted me and I have not been able to contact anyone because the phone numbers have been all disconnected. There is no Trump University.

Kathleen Meese  
KATHLEEN MEESE

Sworn before me this 16 day of August, 2012

Angela R. Frank  
Notary Public  
State of NY  
My Commission Expires: 1/23/14

ANGELA R. FRANK  
Notary Public, State of New York  
Qual. in Mont. Co. No. 01FR6140157  
My Commission Expires Jan. 23, 2014

# Exhibit K18

Affidavit

STATE OF Arizona )  
COUNTY OF Maricopa ) ss.:

DOE MOUNTER, residing at 5137E CASPER ST MESA AZ  
(Name) (Address) 85205  
states that this is a true and accurate copy of the complaint I filed against Trump

University. The complaint accurately describes the circumstances surrounding my  
dealings with Trump University. Any copies of correspondence and/or other documents  
attached to the complaint are true and correct copies. After the date of this complaint,

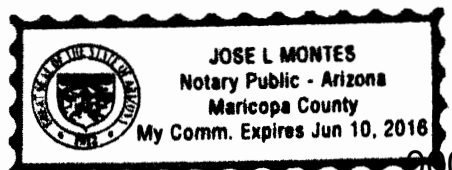
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

DoE MOUNTER  
(Signature)

7-2-13  
(Date)

Subscribed and sworn to before me this 2 day of July, 2013

[Signature]  
Notary Public



10-7103

**From:** <nobody@pubsrv10.azag.gov>  
**To:** <online.complaints@azag.gov>  
**Date:** 4/3/2010 3:15 PM  
**Subject:** Online Consumer Complaint

Below is the result of your feedback form. It was submitted by  
( ) on Saturday, April 03, 2010 at 15:15:21

---

subject: Online Consumer Complaint

01age: 60andOver

02contact\_yesno: Yes

03media\_yesno: Yes

04govt\_yesno: Yes

05military: Veteran

06HowHeard: Media: Newspaper/Radio/TV

07OtherHowHeard:

08Cust\_First\_Name: Deo

09Cust\_Last\_Name: Munter

10Cust\_Address: 44 S Hawes Rd C21

11Cust\_City: Mesa

12Cust\_State: Az

13Cust\_Zip: 85208

85205

14Cust\_HomePhone\_Area: 480

15Cust\_HomePhone: 357-4062

16Cust\_WorkPhone\_Area: 480

17Cust\_WorkPhone: 510-4111

18Cust\_FAX\_Area: 480

19Cust\_FAX: 357-4062

20Cust\_Email: deomunter@yahoo.com

21PV\_Name: Trump University

22PV\_Address: 30 east 33rd st. 12th floor

Moved to 5137 E CASARST  
MESA AZ 85205

S

000100

23PV\_City: New York City

24PV\_State: New York

25PV\_Zip: 10016

26PV\_Phone\_Area: 212

27PV\_Phone: 533-6200

28PV\_2ndPhone\_Area: 646

29PV\_2ndPhone: 810-2119

30PV\_Email: jschauer@trumpuniversity.com

31PV\_Website: NA

32Circumstances: I went to a seminar on real estate investing. I signed a contract with

them to learn to invest in and turn troubled properties for profit. I was asked to pay them \$35,000 which I paid them by credit card. The contract read that we had three days in which we could opt out of the contract

which I did on the third day, because the stress of it caused me to have

a mini stroke or T.I.A. I called Jason Schauer ( who was supposed to be my contact ) at 646-810-2119. I told him I was unable to continue with the program. He told me he would wave the three day until I would have

time to see my doctors and see if I may be able to continue. After I saw

my doctors, which took me approximately two weeks. I called him and told him I wanted to cancel. I then sent a e-mail to James Harris who was

to be my mentor on the last of May which was in side of 30 days

I then heard from Jason Schauer and he kept telling me that he was

working on it. I sent numerous e-mails to him and he kept telling the

same thing. I have several copies of the e-mails where he kept stalling me. At first I called him on the telephone so I don't have any copies.

Deo Munter PS the money that I paid was for future seminars that were

Upcoming and I didn't go to any of them.

33complain\_yesno: Yes

34ComplaintResponse: They just kept on telling me everything was

being done to return my money. But I now am

convinced that they were stalling for time.

35warranty\_yesno: Yes

36sign\_yesno: Yes

37Trans\_Date\_Month: April 0

38Trans\_Date\_Day: 26 0

39Trans\_Date\_Year: 2009

40Trans\_Place: Phoenix at seminar

41Damages: \$34,495 +\$1495+int

42SalesPerson: They didn't sign it.

43Witness: Barbara Williams

44ad\_yesno: Yes

45Advertised: Ad in News paper

46attorney\_yesno: Yes

47Attorney: Allyson Dellecchio with the firm of Tarascio&

Winship.

137 N.Country Club Drive

Mesa, Az. 85201

Phone877-512-5872 ---480-649-2905

48action\_yesno: Yes

49Agencies:

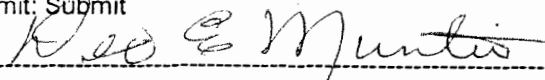
50Comments: I would like to recover the years interest as well as the

\$1495 I spent for attending their seminar.

51Name: Deo Edward Munter

52Date: April 3, 2010

submit: Submit

  
-----

Dea Munte

NOTICE OF CANCELLATION

Date: \_\_\_\_\_

YOU MAY CANCEL THIS TRANSACTION, WITHOUT ANY PENALTY OR OBLIGATION WITHIN THREE BUSINESS DAYS FROM THE ABOVE DATE.

IF YOU CANCEL, ANY PROPERTY TRADED IN, ANY PAYMENTS MADE BY YOU UNDER THE CONTRACT OF SALE, AND ANY NEGOTIABLE INSTRUMENT EXECUTED BY YOU WILL BE RETURNED WITHIN TEN BUSINESS DAYS FOLLOWING RECEIPT BY THE MERCHANT OF YOUR CANCELLATION NOTICE, AND ANY SECURITY INTEREST ARISING OUT OF THE TRANSACTION WILL BE CANCELLED.

IF YOU CANCEL, YOU MUST MAKE AVAILABLE TO THE MERCHANT AT YOUR RESIDENCE, IN SUBSTANTIALLY AS GOOD CONDITION AS WHEN RECEIVED, ANY GOODS DELIVERED TO YOU UNDER THIS CONTRACT OR SALE; OR YOU MAY IF YOU WISH COMPLY WITH THE INSTRUCTIONS OF THE MERCHANT REGARDING THE RETURN SHIPMENT OF THE GOODS AT THE MERCHANT'S EXPENSE AND RISK.

IF YOU DO NOT AGREE TO RETURN THE GOODS TO THE MERCHANT, OR IF THE MERCHANT DOES NOT PICK THEM UP WITHIN TWENTY DAYS OF THE DATE OF YOUR NOTICE OF CANCELLATION, YOU MAY RETAIN OR DISPOSE OF THE GOODS WITHOUT ANY FURTHER OBLIGATION.

TO CANCEL THIS TRANSACTION, MAIL OR DELIVER A SIGNED AND DATED COPY OF THIS CANCELLATION NOTICE OR ANY OTHER WRITTEN NOTICE, OR FAX 212-937-3830 . OR SEND A TELEGRAM, TO TRUMP U. 40 WALL STREET, NEW YORK, NY 10005 NOT LATER THAN MIDNIGHT OF 4/29/09.

I HEREBY CANCEL THIS TRANSACTION.

DATE: \_\_\_\_\_

\_\_\_\_\_  
Buyer's Signature

Print Name: \_\_\_\_\_

Address: \_\_\_\_\_

\_\_\_\_\_  
Telephone: \_\_\_\_\_



# **Exhibit K19**

**AFFIDAVIT OF MARIBEL PAREDES**

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

MARIBEL PAREDES being duly sworn, deposes and says:

1. I reside at 101 West End Avenue, Apt. 16DD, New York, NY 10023.
2. I make this statement concerning the business acts and practices of Trump University (“Trump”) of my own knowledge.
3. I received an invitation in the mail to come to a free seminar taught by Trump about investing in distressed properties and buying properties. I was interested in real estate, and I had heard that people tended to do well financially in that profession. Because the economy was in a slump, and my income as a personal fitness trainer was affected, I thought that it might be a good time to learn a different profession. Trump is the king of real estate, and I wanted to learn from the best.
4. In the fall of 2009, I attended a free seminar that lasted two to three hours, at a Manhattan hotel.
5. The free seminar was all about the three-day course that Trump offered. Trump promised that the three-day course would teach us how to make money in real estate in this economy and in general. By comparison, I went to a different real estate seminar about one year later taught by another real estate investor, Dean Graziosi, who directly contradicted what Trump told us, saying that it was very hard to make money in this economy in Manhattan real estate.
6. I signed up for the Trump three-day seminar, where I expected to learn the strategies and the ins and outs of real estate investing.

7. I attended the Trump three-day seminar in Manhattan on September 25-27, 2009, and paid \$700, because I attended and split the cost with a friend. Our speaker, James Harris, was very charismatic. He talked about meeting Donald Trump and that Donald Trump himself and one of his associates took him under his wing. With all the pictures of Donald Trump and talk of a "special guest speaker," I thought that Donald Trump would make a personal appearance, but he did not.

8. Throughout the three-day seminar, Mr. Harris spoke about three different Trump Elite programs and the different services they offered. He also spoke about different ways to make money in real estate, how to close a deal, how to fill out forms, and how to find foreclosed homes.

9. During the first day of the three-day program, Trump conducted an exercise to get us to be bold and to do something we were not comfortable with. We were asked to call our credit card companies to increase the credit limit on our cards. I increased my credit card limit at Trump's insistence. Later, on the third day of the seminar, Trump said that we could use the newly increased credit card limits to pay for Trump Elite investment programs.

10. On September 27, 2009, the final day of the three-day seminar, my friend and I purchased a Trump Bronze Elite investment program for \$4,500 each, because that was all that we could afford. Mr. Harris told us that we had to sign up for the Elite programs that day or that was it; we could not go home and think about it. Mr. Harris said that, as part of the mentorship program, Trump would make available all the connections and resources necessary for us to succeed in real estate.

11. At the end of the three-day course, Mr. Harris told us to look through the newspapers, find properties and start making calls, and to call Trump with any questions.

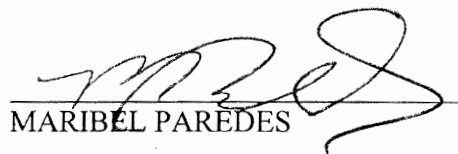
But I did not feel that a three-day course in real estate, with an overwhelming amount of information thrown at me, provided enough education for me to go out on my own and to start investing.

12. I did not receive much support as a result of joining the Trump Elite program either. When I called Trump with questions, the Trump mentors, Stephen Gilpin, Mike Dubin and Kevin Derrick, were not thorough much of the time with their answers. I felt rushed during the calls and felt that there was a limit on how much of the mentors' time I could take up during each call.

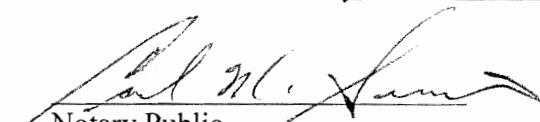
13. I do not recall whether or not I filled out any evaluations. I remember leaving the three day program feeling excited about the opportunities the speakers described. If I had filled out the evaluation of that program on the third day, it probably would have been favorable. But if I were asked about the program two weeks later, after I attempted to look for real estate deals using the Trump methods, that evaluation would have been very negative.

14. I never made a complaint to Trump, because in my mind, I wrote it off as a bad investment on my part.

15. I feel that Trump was a scam. They made it seem easier than it actually is to get into real estate. There was a great deal of pressure to sign up for more training programs and very little guidance once you signed up for more.

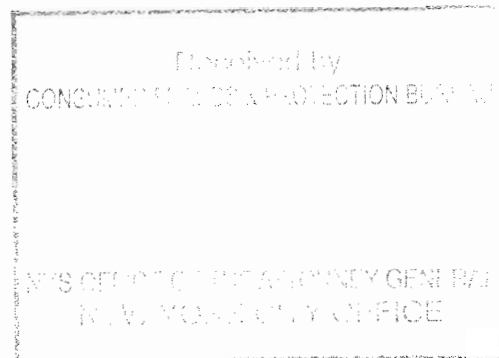
  
MARIBEL PAREDES

Sworn before me this 1 day of October, 2012

  
Notary Public  
State of New York  
My Commission Expires: 6/2/2016

**Carl M Simms**  
Notary Public State of New York  
New York County  
Lic. #01SI6188175  
Comm. Exp. June 2, 2016

# **Exhibit K20**



**AFFIDAVIT OF JEAN PIERRE**

STATE OF NEW YORK                    )  
  )ss.:  
COUNTY OF KINGS                    )

JEAN PIERRE being duly sworn, deposes and says:

1. I reside at 668 Argyle Rd., Brooklyn, NY 11230.
2. I make this statement concerning the business acts and practices of Trump University (“Trump”) of my own knowledge.
3. I learned about Trump from newspaper ads. I wanted to get into real estate and thought that because this program was offered by Donald Trump, who is such a respected individual, it must have been the right program to learn about real estate investing. I thought that because this was a “university” it was a legitimate program and not a sham business.
4. I attended a free session at the Marriott Hotel, in Manhattan’s financial district, on November 3, 2008. At this event, there were photographs of Donald Trump everywhere, making it seem that he would make an appearance.
5. During the free presentation, we were encouraged to sign up for a three-day seminar with Trump. We were told that, with the information we would learn from Trump during the three-day seminar, we would be able to purchase a piece of real estate within thirty days and start making money.
6. I knew nothing about real estate, but at the free presentation, Trump staff made you feel that it was the right place to learn, because they promised to offer so much information and support and promised to hold your hand through the process until you succeeded.

7. I attended the three-day Trump seminar at the New Yorker Hotel on 34th Street on November 14 through 16, 2008, for which I paid \$1,495.

8. At the three-day seminar, the speaker, James Harris, asked us to increase our credit card limit to increase our capital available for real estate business. Mr. Harris instructed us what to say to the banks to get our credit card limits raised. Some people called their credit card companies during the three-day seminar. I did not increase my credit card limit at the time.

9. During the three-day seminar, Trump staff worked hard to convince us to join one of the Trump Elite programs, which included a mentorship and additional seminars. They had asked us to provide them with our financial information, and then they used that information during one-on-one meetings with us to push us to sign up for their Elite mentorship programs. I was told that I would receive a lot of one-on-one hand-holding if I joined the \$35,000 elite program. One of the speakers said that we, especially those who live in New York City, would recoup our \$35,000 with the first deal we completed. They promised that we would start buying and selling properties right away and talked about how easy it was to flip properties and make money quickly.

10. At the end of the three-day seminar, Trump staff told us to go out there and start our investments. But I did not learn much at the three-day seminar, and that is why I signed up to work with a mentor as part of the Trump Gold Elite membership, hoping to learn a lot there. I was envisioning a mentor holding my hand and that I could not fail with Trump's help. I paid \$35,176.10 for that program.

11. After signing up for the Trump Gold Elite program, I attended some seminars that were part of the program. One of the seminars called "Wealth Preservation -- Asset Protection Retreat," which took place from December 12-14, 2008, in Long



Island, covered legal entities in real estate, and also covered how to increase a credit card limit. At that seminar, we received a script called "Surefire Script to More Purchasing Power!!" (attached as Exhibit A). This script suggested that in responding to the question about our current income, we should use our current income and add projected income from our future real estate venture. The script also contained instructions on how to apply for an instant credit card on line. The script similarly instructed us to add our projected income to our current income and stated "If they ask you to prove income, inform them that it will be too much trouble to put all the paperwork together." At that seminar I got two new credit cards – Discover and American Express.

12. At each seminar, Trump was selling some kind of an additional product. For example, there was an additional \$25,000.00 mentorship package for the Commercial Real Estate. There was a \$1,995.00 package offered at the Creative Financing. I paid this fee for which they sent CD ROMs and charged \$495.00 for them and \$1,500.00 for a Coordinating Coaching. This coaching never happened.

13. My assigned mentor for the Trump Elite program was Stephen Gilpin. I was supposed to have a three-day one-on-one mentoring session with him but that never took place. Initially there was a scheduling conflict, and then Mr. Gilpin never followed up with me. I realized that these people were not really dedicated to me, and that I was not a priority for them. I also became doubtful that I would learn anything from the mere three days of meeting with Mr. Gilpin and looking at properties.

14. I had a few calls with Mr. Gilpin, which were not helpful, and I did not feel that I knew enough about real estate to do any deals on my own.

15. I was also sold Trump software for \$2,500 (which is included in the \$35,176.10) and a monthly fee of \$25. I opened up the software but needed someone to

guide me through it, because I could not use it on my own. Trump did not hold my hand as it promised to do.

16. I lost confidence and canceled the software in July 2009, but did not ask for a refund, because I did not know what my rights were at that point.

17. I filled out evaluations for all the programs and gave everyone favorable rating because the questions were phrased in favor of Trump and because I had no independent knowledge of the real estate business.

18. I never did any deals. I was very disappointed with Trump and wanted to get my money back \$39,351.00, but I did not think I had any legal recourse. I figured that my money was lost.

  
JEAN PIERRE

Sworn before me this 23 day of August, 2012

  
\_\_\_\_\_  
Notary Public

State of New York

My Commission Expires: 11-16-2013

MONA H. BASS  
Notary Public, State of New York  
Qualified in King County  
No. 01BA6213605  
My Commission Expires 11-16-2013

**EXHIBIT A**

### **Surefire Script to More Purchasing Power!!**

Empower yourself immediately...Increase Your Credit...Call Your Creditors and Get  
What You Deserve: A Bigger Credit Line, A Better Rate and Less Fees!

---

**To Operator:** Hi, my name is \_\_\_\_\_. What is your name please? (Operator answers)

Thank you. Well, (operator's name) I am thinking about making a large purchase in the near future, and I called to find out my credit limit. What is my limit?(Operator answers).Hmmm...(as if you are not happy.)

What is the maximum amount of credit you can give me today?

**Operator:** How much do you want?

I would like a limit of \_\_\_\_\_. (Your limit times 4)

**Operator:** Do we have permission to run your credit?

Yes.

**Operator:** Do you still have the same job?

Yes, and I have additional income from a separate business.

**Operator:** What is the name of your business?

It is \_\_\_\_\_. (Decide ahead of time a name that you will call your business, but don't include Real Estate in the name. Be vague.)

**Operator:** How much money do you make?

I expect to make \_\_\_\_\_. (Use your current income, plus projected income from Real Estate.)How much of an increase can you give me today?I would like to make a large purchase today for my business.

Okay, now that we have adjusted my limit, it occurs to me that I should check my interest rate. What is my current rate?

(Operator answers) Hmmm...

I would like to use this card for my purchase, but that rate seems high. What is the lowest rate you can give me today?

In addition, can you give me access to credit card checks at the lowest interest rate interest rate you offer? While we're at it, would you check and see if I have any annual fees. (Operator answers). Hmmm...I don't think all my cards have those fees. Could you have them removed?

#### **SCRIPT SUCCESS NOTES:**

Own the conversation, be confident and powerful.

Be friendly but detached. They want your business.

Be friendly and firm. More bees come to honey than vinegar.

PRETEND-If this is hard and scary to you, be an actor!

Don't take "No" for an answer. Go up 1 or 2 levels as needed.

Assume your success, and you will succeed.

**Go to the following website to gain access to Investor Friendly Cards:**

**[www.mycrediddaddy.com](http://www.mycrediddaddy.com)**

Go to one of this website to apply for each card online. Fill in all pertinent information and make sure to add your projected income to your current income for the total household income question.

Remember, this is the projected income. You will receive instant approval on most of these cards in less than a minute once you complete the application. Once you get the card in the mail ten or so days later, call the company and ask for 4 times your limit. If they ask you to prove income, inform them that it will be too much trouble to put all the paperwork together. Then, ask them for the maximum amount of credit they can give you based on your information.

Good Luck and go get your free/low interest capital to invest with! After all, this is all about using other peoples' money to invest!

Feel free and email us at [creditstrategies@gmail.com](mailto:creditstrategies@gmail.com)

# **Exhibit K21**

**AFFIDAVIT OF PATRICIA RODRIGUEZ**

STATE OF NEW YORK                    )  
  ) ss.:  
COUNTY OF THE BRONX            )

PATRICIA RODRIGUEZ being duly sworn, deposes and says:

1. I reside at 772 Home St., Bronx, NY 10456.
  
2. I make this statement concerning the business acts and practices of Trump University ("Trump") of my own knowledge.
  
3. I learned about Trump through an email solicitation I received after I attended a real estate seminar with a different company. As a real estate agent, the seminar appealed to me because I wanted to expand my skill set and learn more about real estate investment. I trusted a program with the name of Donald Trump, since he made his fortune in real estate. I was also drawn by the fact that it was called a "university," and I thought that it would be a structured learning experience, such as in a college or university.
  
4. I attended a free Trump session in April 2010. At that event, the speakers spoke very highly of the Trump three-day seminar. They claimed that by the end of it, we would have an advantage over others who had not taken the seminar. We were told that we would learn how to work with hard money lenders and how to flip foreclosed homes. We were also told that Donald Trump often drops by the seminars, and that "you never know when he might show up." They emphasized that "education pays," and I believed them. I signed up for the Trump three-day seminar, called "Fast Track to Foreclosure," paying \$1,495. It took place in April 2010, at a hotel in midtown Manhattan.

5. At the seminar, Donald Trump's photograph hung from the entrance of the hotel ballroom, but Mr. Trump was nowhere to be seen. I was looking forward to taking a picture with him personally, not with a cardboard cutout of him, like I ultimately wound up doing. Gerald Martin, the main speaker, was accompanied by a few others, all of whom bragged about how much money they had made on deals by using the Trump method. They also showed us slides of their mansions with luxury cars parked outside, supposedly to show that they had been successful with their real estate investments as a result of Trump. After their introductions, I was provided with a binder containing lots of handouts on foreclosures, choosing an area to invest in, finding properties, and working with people. I was familiar with most of the information because of my work as a real estate agent, but I had not yet lost all hope in Trump. At the time, I still thought that I would learn something of value from Trump.

6. By the third day of the seminar, the speakers were pitching Trump mentorship programs and retreats. They said that if we did not sign up for these intensive advanced programs we would be "going nowhere." I signed up for the Quick Start Real Estate Retreat offered as part of the Trump Bronze Elite package, because I thought that an advanced seminar would be more suited for someone with a real estate background like me. I paid \$4,995. Ultimately, I did not attend the course.

7. After speaking to others at the seminar who had already taken the course, and claimed that it was overpriced, I demanded a refund. It took various attempts, including three phone calls and a visit to the Trump building, to receive a refund for the Quick Start Real Estate Retreat.



8. I continued to receive emails and mail solicitations from Trump over the next months. The courses seemed interesting, and coincidentally, I was invited to attend another free seminar with a student who I had met at Trump before. At the time, I was still curious about the courses and somewhat doubtful of my previous decision to retract from the program, so I went. That day I signed up for the "Tax Lien Certificate Course" for \$1,997.00, and a software program called the "Ultimate Research Tool," for \$2,492.00.

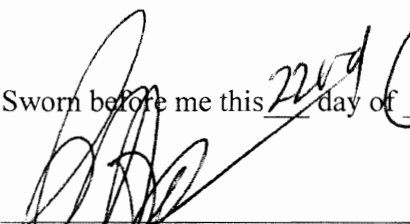
9. I did not use the software program at all because it was too complicated to use and I was unable to receive any assistance from Trump. In fact, whenever I called Trump for help, my voicemails were never returned. The course was a complete disappointment. Most of us in the class were hoping to learn information about tax lien certificates for properties within New York. However, through my own research online, I learned that I would only be able to buy tax certificates for properties outside of New York, which I was not interested in doing. I also confirmed this when I visited the Bronx Family Court and Department of Finance, to request information on tax lien certificates, as I was instructed to do by Trump.

10. I did not request a refund because I was told that I would be ineligible for one.


11. I was misled in thinking that I was going to be enrolled in a structured course, such as in a college or university.

  
PATRICIA RODRIGUEZ

Sworn before me this 22nd day of Sept, 2012

  
\_\_\_\_\_  
Notary Public

State of NY  
My Commission Expires: 4/19/2015

  
4/19/2015

# **Exhibit K22**

**AFFIDAVIT OF KEVIN SCOTT**

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

KEVIN SCOTT being duly sworn, deposes and says:

1. I reside at 61 Charter Circle, Apt. C1, Ossining, New York 10562.
2. I make this statement concerning the business acts and practices of Trump University (“Trump”) of my own knowledge.
3. In early May 2008, I saw an advertisement in the newspaper for a free presentation by Trump at the Westchester Marriott Hotel. I attended the presentation, where the instructor, James Harris, made a good pitch for Trump’s three-day class at the end of May. Mr. Harris said that the program participants would receive intensive training by Trump’s experts, such as himself, Dave Sampson and others, all top notch professionals in real estate, according to Mr. Harris. These professionals, Mr. Harris said, had years of experience with all kinds of real estate transactions.
4. When I signed up for the Trump seminar, I had a credit score of 817, and I wanted to make some money to pay off my debts.
5. During the free seminar, Mr. Harris went over very basic information about real estate investing and presented just enough to get us interested in taking the next level seminar. He promised that at the three-day seminar, Trump experts would show us how to get so-called “hard-money” lenders and how to work with a bank to get financing for our real estate deals.
6. I paid \$1,495 to attend the three-day seminar on May 30 - June 1, 2008, at the Sheraton Hotel on 57th Street in New York City.

7. Our primary speaker was once again James Harris, who said that he had personally worked with Donald Trump. He said that he had been involved in numerous real estate transactions of all kinds with Donald Trump over the years. We were also told that all Trump speakers had been buying and selling properties for a long time, had experience in real estate business, flipping distressed properties and helping during pre-foreclosure by doing owner-seller financing. Mr. Harris alluded to some unfavorable press around Trump, but said that we should not worry about it.

8. Mr. Harris told stories about his mother being addicted to drugs and about being an underachiever in his early life. He said that he became a millionaire by using Trump techniques. He said that many years ago he made \$75,000 profit on his first real estate deal and bought himself a new Porsche. I was not interested in getting a Porsche -- I simply wanted to make enough money to pay off my outstanding debts.

9. During the three-day session, Mr. Harris asked us to increase our credit card limits so we could put down payments for our real estate purchases on our credit cards. I increased my credit card limits, and that is how I eventually paid for the Trump Elite program.

10. At the three-day seminar, we were told how to find deals by looking through publications, how to research properties for sale, and how to find properties for sale by owner. One of our assignments was to find deals and to bring them to class. Some people brought deals to class, and Mr. Harris called the sellers on a speaker phone so we could hear the conversations.

11. Mr. Harris said that Trump had hard-money lenders standing by and ready for those who found deals. At the end of the three-day seminar we were told that we were now ready to invest in real estate, but if anyone felt that they needed more help, the

Trump staff were there to do the after-sell. They pushed the Trump mentorship programs heavily during the three days and set aside time for people to look at the different Trump Elite programs.

12. Mr. Harris said that we would be able to make back the tuition for the Trump Elite programs quickly and used a baseball analogy to demonstrate our future profits: a single would bring in \$25,000 profit, double would be \$50,000, a triple would be \$75,000, a home run would be \$100,000, and a grand slam would be whatever goal you set for yourself.

13. Mr. Harris told us that if we signed up for one of the Elite programs, we would work one-on-one with a mentor, look at properties, make offers, have special access to hard-money lenders, and do a deal all within the first week. I thought that if they were going to hold my hand that much, how could I say no?

14. I then signed up for a \$25,000 Gold Elite mentorship, which consisted of only one-on-one mentorship (no seminars), because that was all that I could afford. My mentor was Keith Minchew.

15. The mentorship was where things got off track for me. It was clearly not what they had advertised. Every time I asked Minchew or other people at Trump about the hard-money lenders, they said they would talk to me about it more once I had a real estate deal. Of course, no one would do a deal unless there was financing in place.

16. Mr. Minchew came from Texas to see me in Westchester for the three-day in-person mentorship. I picked him up in the morning, and we looked at properties that I found before his arrival. However, I was not able to do any deals. Because the properties I viewed were in foreclosure, they were mostly owned by banks, and the banks would not do a deal with me unless and until I had financing. And I was not able to get financing

from banks because I did not have a deal with the seller of the property. As for the hard-money lenders Trump had promised, they were still nowhere to be found.

17. I tried to put together at least three deals with my mentor, Mr. Minchew, and later several more on my own, but none worked out because I was unable to get financing. For seven to eight months I worked diligently trying to find deals and to secure financing, but I got nowhere. I had a feeling that getting a deal and financing were like two hands one foot apart and neither could reach the other. I called Trump and told them that I found properties and put together a proposal and requested them to get me the promised financing from their hard-money lenders. But they just told me that I needed to work harder to get a deal in place first. Because Trump never offered me an opportunity to talk to any hard-money lenders, I began to suspect that there were no hard-money lenders at all.

18. I had several follow-up calls with Mr. Minchew, but reality started to set in that this was not working out. Trump's theory about real estate investing might have been correct for a real estate mogul like him, but it did not reflect the reality for the average investor.

19. I also purchased Trump software for about \$2,000, plus \$30 per month data fee. That software was supposed to allow a user to look up information about properties, but I soon discovered that the database was not up to date. For example, when I researched my own property and properties of my friends in the database, information about these properties was several years behind.

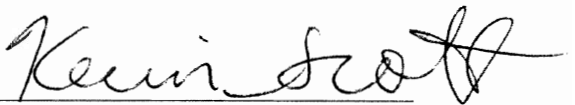
20. In an exit interview, I rated Mr. Minchew well because I did not think that the problems with the mentorship were his fault. Also, it was Mr. Minchew himself who

filled out the evaluation form, while I told him what to write. I said that he was courteous and professional, but that I did not see any results.

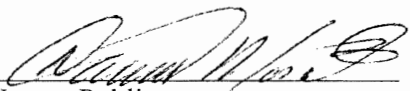
21. I called up Trump in May 2009, to say that I saw no results after participating in Trump Elite Program and I requested a refund. Instead, I got a new mentor, Steve Gilpin. Mr. Gilpin called a couple of times and wanted me to find more deals. He seemed to be following the same script as Mr. Minchew and had nothing new to offer me in terms of information or help with closing a deal, so our communications broke off within a month.

22. I requested a refund from Trump again, but my calls were never returned. I left several messages on Trump's main office's voice mail but received no response.

23. Because of the accumulated debt, in large part exacerbated by debts to Trump, I had to move out of my house into a studio apartment, so I could sublet my house and use the rent money to pay off the debts.

  
KEVIN SCOTT

Sworn before me this 18<sup>th</sup> day of August, 2012

  
Notary Public  
State of NY  
My Commission Expires: 11/22/2014

DAVID MORALES  
Notary Public, State of New York  
No. 01MO6231423  
Qualified in Westchester County  
Commission Expires November 22, 2014



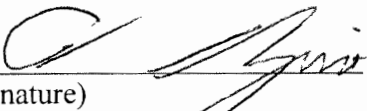
# **Exhibit K23**

**Affidavit**

STATE OF Maryland )  
 ) ss.:  
COUNTY OF Baltimore )

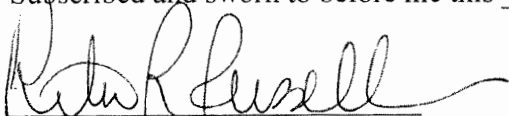
Gary S Shapiro, residing at 6 Chellis Ct, Owings Mills MD 21117  
(Name) (Address)

states that this is a true and accurate copy of the complaint I filed against Trump University. The complaint accurately describes the circumstances surrounding my dealings with Trump University. Any copies of correspondence and/or other documents attached to the complaint are true and correct copies.

  
(Signature)

6/18/13  
(Date)

Subscribed and sworn to before me this 18<sup>th</sup> day of June, 2013

  
Notary Public

**RITA R RUSSELL  
NOTARY PUBLIC  
BALTIMORE COUNTY  
MARYLAND  
My Commission Expires 08-08-2015**

NOTE: AFTER FILING  
THIS COMPLAINT  
WE RECEIVED A  
FULL REFUND FROM  
TRUMP UNIVERSITY.  
000129

DEC 31 2009

Consumer Frauds Bureau  
Albany, New York

December 19, 2009

Attn:  
MD Office of the Attorney General  
Dispute Department

RECEIVED BY  
CONSUMER FRAUDS & PROTECTION BU.  
JAN 19 2010  
RECEIVED  
NYS OFFICE OF THE ATTORNEY GENERAL  
NEW YORK CITY OFFICE  
DEC 8 2009  
ATTORNEY GENERAL'S OFFICE  
PUBLIC INFORMATION RESPONSE

cc: New York Office of the Attorney General

To Whom It May Concern:

We are writing you today concerning a dispute that we have with Trump University. We attended a 3-day seminar concerning Investing in Real Estate and then were talked into signing up for a Bronze Elite Package for which we were charged \$10,000.

As we proceeded to follow the steps that we were taught in the initial seminar, we discovered that this program was highly problematic as well as misleading. We were coerced into signing a contract that our instructor said if we don't sign now on the spot, they were packing up and leaving town and we would miss a golden opportunity. They said "just sign, you won't regret it." Although the contract had a 3-day rescission period, it was impossible to determine the success or failure of this program because of all of the complexity and logistics involved. We feel that this was purposely set up this way because Trump knew that no one could possibly know in 3 days whether or not this program would work. Our instructor from the initial seminar, Gerald Martin personally promised that he would work with us until we completed our first deal. He became increasingly harder to reach and was very short with us on the phone, at times giving us incomplete or erroneous information. He also said on numerous occasions that in order for us to be successful, we really need to sign up for the Gold Elite package for another \$25,000. Initially he was glad that we signed up for the \$10,000 program, but as we got more involved with him and started asking more questions, he became agitated and said that we should have gotten the \$35,000 plan to begin with.

When the time came for us to make our first deal with a potential seller who we personally met with, we were told that our position was that of a broker. Per our title company, Supreme Title, Jeffrey Margolies, on 11/11/09, said that in Maryland, this type of transaction is considered mortgage fraud. The transaction was that we would under contract find a buyer and charge him more than we paid. Then the seller would hold a note for half the sales price for 3 years, thus requiring the buyer to find a mortgage for only half of the sales price. We were told that no lender in MD in their right mind would give a loan under these conditions and would consider it **fraudulent**. We are neither trained nor licensed in Maryland or any other state to act as a broker. When we contacted Jason Schaeuer at Trump's headquarters and told him what our title company told us, he asked the name and phone# of the title company, saying he would get back to us and never did. He told us at the time as did Gerald Martin, that the challenge of this program

is to get a title company that will work with you. Also Gerald Martin emailed us a contract of sale to use with our potential seller and was very short with us when we inquired as to how to implement said contract.

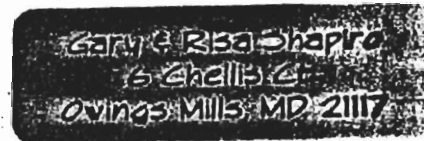
We recently contacted Jason Schaeuer on 2 occasions to see if Trump would work with us and issue us a partial credit for the seminars which were part of the Bronze package that we did not attend, that amounted to \$9,000. Jason told us that just because one type of deal in our state could not work (was fraudulent) we needed to try some other techniques and told us that we just weren't working hard enough at the task. We felt that we didn't want to be involved in anything that might be considered illegal or immoral. He said that he would refer the matter to his manager and that we would receive a call back. We have not heard another thing.

We feel that these Trump seminars are scams that prey on everyday hardworking people who are trying to better themselves. Many will fall victim to these unjust sales tactics and we hope by writing to you today that you can resolve our financial loss and prevent others from being swindled as well. I cannot afford to incur this huge loss, and I am pleading with you to work with Trump to make this just.

If you need to contact me you can call me on my cell phone: 410-446-7851. I appreciate your attention to this matter.

Yours truly,

  
Gary Shapiro



NOTICE OF CANCELLATION

Date: \_\_\_\_\_

YOU MAY CANCEL THIS TRANSACTION, WITHOUT ANY PENALTY OR OBLIGATION WITHIN THREE BUSINESS DAYS FROM THE ABOVE DATE.

IF YOU CANCEL, ANY PROPERTY TRADED IN, ANY PAYMENTS MADE BY YOU UNDER THE CONTRACT OF SALE, AND ANY NEGOTIABLE INSTRUMENT EXECUTED BY YOU WILL BE RETURNED WITHIN TEN BUSINESS DAYS FOLLOWING RECEIPT BY THE MERCHANT OF YOUR CANCELLATION NOTICE, AND ANY SECURITY INTEREST ARISING OUT OF THE TRANSACTION WILL BE CANCELLED.

IF YOU CANCEL, YOU MUST MAKE AVAILABLE TO THE MERCHANT AT YOUR RESIDENCE, IN SUBSTANTIALLY AS GOOD CONDITION AS WHEN RECEIVED, ANY GOODS DELIVERED TO YOU UNDER THIS CONTRACT OR SALE; OR YOU MAY IF YOU WISH COMPLY WITH THE INSTRUCTIONS OF THE MERCHANT REGARDING THE RETURN SHIPMENT OF THE GOODS AT THE MERCHANT'S EXPENSE AND RISK.

IF YOU DO NOT AGREE TO RETURN THE GOODS TO THE MERCHANT, OR IF THE MERCHANT DOES NOT PICK THEM UP WITHIN TWENTY DAYS OF THE DATE OF YOUR NOTICE OF CANCELLATION, YOU MAY RETAIN OR DISPOSE OF THE GOODS WITHOUT ANY FURTHER OBLIGATION.

TO CANCEL THIS TRANSACTION, MAIL OR DELIVER A SIGNED AND DATED COPY OF THIS CANCELLATION NOTICE OR ANY OTHER WRITTEN NOTICE, OR FAX 212-937-3830, OR SEND A TELEGRAM, TO TRUMP U, 40 WALL STREET, 32ND FLOOR, NEW YORK, NY 10005 NOT LATER THAN MIDNIGHT OF \_\_\_\_\_.

I HEREBY CANCEL THIS TRANSACTION.

DATE: \_\_\_\_\_

\_\_\_\_\_  
Buyer's Signature  
Print Name: \_\_\_\_\_  
Address: \_\_\_\_\_  
\_\_\_\_\_  
Telephone: \_\_\_\_\_

# **Exhibit K24**

**AFFIDAVIT OF MICHAEL SHEEHAN**

STATE OF NEW YORK                    )  
  )ss.:  
COUNTY OF ALBANY                    )

MICHAEL SHEEHAN being duly sworn, deposes and says:

1.     I reside at 184 Consaul Rd., Colonie, NY 12205.
2.     I make this statement concerning the business acts and practices of Trump University (“Trump”) of my own knowledge.
3.     I learned of Trump through the New York Times newspaper. I thought that real estate investment would be a promising way to make some extra income.
4.     I attended a free session with Trump in June 2009. It was held at the Marriott hotel on Wolf Road in Albany. The speakers promised that if I signed up for the Trump three-day seminar I would receive guidance every step of the way from my instructors in carrying out my first sale.
5.     I attended the three-day session paying \$1,495. The main speaker, Steve Goff, shared how he became “something from nothing” with the Trump method. He said that Donald Trump was a business partner of his and that Mr. Trump started the program because he wanted to help people, not for the money. He also claimed that Donald Trump hand-picked him to teach that seminar.
6.     During the seminar, I was given little information and was expected to find my own listings, without guidance on how to do so. The instructors spoke about their own accomplishments the entire time.
7.     During the three-day seminar, I also felt pressured to sign up for one of the Trump mentorship programs. Then after I said I was not interested, they ignored me for

the rest of the weekend. The students who had agreed to enroll in the mentorship program were given the most one-on-one attention from the instructors. The only help I received was assistance in making a phone call to a seller, which I could have made myself.

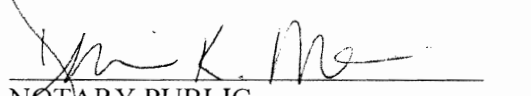
8. The three-day seminar was nothing more than an up-sell to the mentorship program. I did not receive the guidance with my first sale that I had been promised at the free introduction.

9. At the end of the three-day seminar, I was asked to complete an evaluation form. I filled out the form in a hurry without giving it much thought, giving high ratings by default, because I was not interested in continuing with the program. They were not candid appraisals of the program.

10. I did not complain nor request a refund because I believed that I would be ignored again. Trump was a big sham.

  
MICHAEL SHEEHAN

SWORN TO before me this 22 day of August, 2012.

  
NOTARY PUBLIC  
State of NEW YORK  
My Commission Expires June 24, 2014

**Danielle K. Marion**  
**Notary Public, State of NY**  
**No. 01MA6076391**  
**Qualified in Saratoga County**  
**Commission expires 6/24/14**



# **Exhibit K25**

**AFFIDAVIT OF SEMA TEKINAY**

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

SEMA TEKINAY being duly sworn, deposes and says:

1. I reside at 300 East 56th Street, Apt. 28B, New York, NY 10022.
2. I make this statement concerning the business acts and practices of Trump University (“Trump”) of my own knowledge.
3. I became interested in Trump because I wanted to get involved in real estate, and Donald Trump’s name is famously associated with real estate, so I believed I would get valuable information from the seminar. Because this was a “university,” I thought that this was an institution dedicated to educating people about real estate, and not merely a promotional seminar.
4. I attended the three-day seminar in March 2009, at a hotel in New York City. I paid \$1,495 for the seminar.
5. The speaker was James Harris. He said that he made a lot of money in real estate and showed us a picture of his house and his car to demonstrate how wealthy he now was.
6. During the seminar, we were asked to increase our credit card limits and to apply for more credit cards so that we could have easier access to funds to do our real estate deals. I called to increase my limit on my American Express card and to apply for another card. I very much regret doing this, because after I made the call, my credit score, which was 802, fell into the 700’s and has not been back up since.

7. Mr. Harris told us that there are always people around interested in loaning money at high interest rates to people interested in doing real estate deals. These were what he called “hard money lenders.” That way, if we put together a deal, we would not have to borrow money from a bank. Trump had contacts with these hard money lenders, and we would get access to them if we signed up for Trump Elite programs. I believed that I was going to get access to all the information I needed to get started in real estate in Trump’s three-day seminar, and did not think that I would have to pay another \$10,000 for Trump’s Bronze Elite program to be able to invest in real estate on my own.

8. Nevertheless, I paid \$10,000 for Trump Bronze Elite membership because I was promised access to advisors and lenders who would help me with deals. I also believed that I would have access to Mr. Harris and his team, because he kept saying “we are always here for you” during the three-day seminar. But Mr. Harris could not be reached after the three-day seminar.


9. I was also interested in the two real estate and wealth management courses which were offered as part of the Trump Elite program. I was told that these courses would be offered in New York, but none were offered in New York. Eventually, Trump cancelled instructor-led training and made the courses available on line, which made me angry, because I specifically signed up for instructor-led courses, hoping to benefit from networking and interactions with Trump’s staff and instructors.

10. A few days after I signed up for the mentorship program, I decided to pursue my jewelry business instead of real estate. I called Trump, and asked to cancel my mentorship program and to give me my money back. I called within three days after


signing up, which, I believed, was in accordance with Trump's cancellation policy, but I was told that they did not issue any refunds for the mentorship program.

11. Trump then assigned me a mentor to help start my jewelry business. My mentor, Larry Morris, did not have actual retail experience, but had an MBA and a background in entrepreneurship and company investments. But most advice provided by Mr. Morris was just common sense. I spoke with him about six times in the course of six months, and these conversations were just question and answer sessions, and only if I had any questions. There was no structure to these calls. The mentorship program was not worth \$10,000.

12. I do not recall whether or not I filled out an evaluation survey for any Trump programs.

  
SEMA TEKINAY

Sworn before me this 29 day of August, 2012



Notary Public  
State of New York  
My Commission Expires: April 27, 2013

NELSON TAVARES  
Notary Public, State of New York  
No. 01TA6204455  
Qualified in Nassau County  
Commission Expires April 27, 2013

# **Exhibit K26**

**AFFIDAVIT OF CESAR TREVINO**

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

CESAR TREVINO being duly sworn, deposes and says:

1. I reside at 148 West 23<sup>rd</sup> Street, Apt 1J, New York, New York 10011.
2. I make this statement concerning the business acts and practices of Trump University (“Trump”) of my own knowledge.
3. I received an email from Trump about a free real estate seminar. I wanted to learn more about real estate opportunities and liked that the seminar was offered under Trump’s name and the logo of “thinking big.”
4. I attended the free seminar at the Roosevelt Hotel in New York City, around September or October 2008.
5. James Harris was the speaker at the free seminar. He told us that at the three-day seminar we would learn how to purchase real estate with no money down and other creative ways to purchase properties. James said that after the three-day seminar we would know enough to invest in real estate by ourselves.
6. I paid \$1,495 and attended the three-day session in October or November 2008 at the Westin Hotel in Waltham, MA.
7. James was the speaker at the three-day seminar as well. He gave examples of his success in real estate investments, said that he purchased multiple properties, got rich dealing in real estate, and showed off his wealth. He flashed his Rolex as an example of collateral and boasted about his ability to buy many unique cars.
8. On the first day James made us do a drill which consisted of us calling our credit card companies and asking to raise our credit card limits. James said that a greater

credit card limit would allow us to buy a house on a credit card which, as I know now, is not really possible. I called my credit card companies and they raised my credit limits up to \$400,000.00.

9. James told us how to find hard money lenders on Google to finance our deals, what to look for when dealing with hard money lenders, how rates worked and, in general, explained how to purchase properties with other people's money. James said that he was a hard money lender himself, saying that while he couldn't lend to us, there were other people who would.

10. From the first day of the three-day seminar, Trump pushed its Elite mentorship programs strongly. They would refer back to the mentor list and add that the sooner you signed up, the better your chances were of getting the mentor you wanted and the best properties. During the second day of the program, Trump staff started having one-on-one meetings with people describing the Trump Elite program and advertising its mentors. They said that in order to be successful in real estate, we should align ourselves with Trump's mentors who were very successful real estate investors having achieved their success using the Trump methods.

11. We were promised that if we enrolled in Trump Gold Elite, we would have unlimited access to our mentors for six months, and that mentors would guide us through our first deals. After this six month mentorship, we would be able to do deals on our own.

12. Trump said that after the three-day program we were ready to do simple real estate deals, such as flipping properties, on our own. However, they said, the mentorship program will teach us how to do it like a pro. By taking all the seminars and

courses which were part of Trump Gold Elite, we would be able to turn this into a full service business as opposed to just flipping houses or doing traditional deals.

13. We were told that we could make the entire Trump Elite tuition back after doing just one deal.

14. I signed up for the Trump Gold Elite program and paid \$35,000 using my newly increased credit card limit.

15. My mentor, Jim Fletcher, came to Boston where we did the three days in-person mentorship. We had a one day conference about how to look for properties and set up meetings with real estate agents, what questions to ask and how to manipulate the realty broker and prepare them for low offers.

16. After Mr. Fletcher left, he was very hard to reach. He did not respond to my calls or emails and I spoke to him a total of two times in six months.

17. I did not find any properties and did no deals because I did not feel that the program gave me enough tools and guidance as promised, to enable me to do these deals on my own.

18. I called Trump and complained about Mr. Fletcher to Jason Schauer. I told Mr. Schauer that I was not receiving the attention I was promised as part of the Gold Elite mentorship program, and that I was not able to do any deals because of lack of guidance from Trump.

19. Trump offered me to have a couple of calls with another mentor, Steve Gilpin. I had three or four calls, after which Mr. Gilpin felt that we were not getting anywhere, and the calls fell off.



20. I attended seminars offered as part of the Trump Elite Program. At these seminars, each instructor tried to sell their CDs and advertized his own services as a mentor.

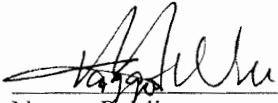
21. I actively looked for real estate, analyzed properties, made offers but was not taken seriously because I was unable to get financing to do a cash deal. I found that hard money lenders were not as willing to lend to us as Trump made it sound.

22. I also bought Trump's software for \$30 per month, which was supposed to have up to date property listings. However, I found it outdated and hard to use, and cancelled it within a year.

23. I do not remember whether or not I filled out a survey of my mentor or speakers at the three-day seminar.

  
CESAR TREVINO

Sworn before me this 12 day of April, 2013

  
Notary Public  
State of NY  
My Commission Expires: 03/04/17



# **Exhibit K27**

**Affidavit**

STATE OF New York )  
COUNTY OF Suffolk ) ss.:

Jeffrey Tufenkin residing at 7400 SW Barnes Rd. #743  
(Name) (Address) Portland, OR 97225

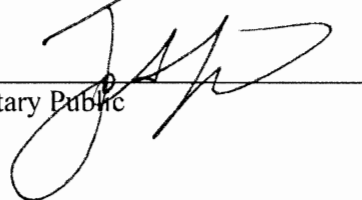
states that this is a true and accurate copy of the complaint I filed against Trump

University. The complaint accurately describes the circumstances surrounding my dealings with Trump University. Any copies of correspondence and/or other documents attached to the complaint are true and correct copies.

  
(Signature)

6/12/13  
(Date)

Subscribed and sworn to before me this 12 day of June, 2013

  
Notary Public

JOANN P. MAGRI  
Notary Public, State of New York  
No. 5010350  
Qualified in Suffolk County  
Commission Expires March 29, 2015

John R. Kroger  
Attorney General



Portland Area (503) 229-5576  
Salem Area (503) 378-4320  
Toll Free Area (877) 877-9392

www.doj.state.or.us

**OREGON DEPARTMENT OF JUSTICE  
CONSUMER COMPLAINT FORM**

RECEIVED  
APR 20 2009

**Please Note the Following:**

CIVIL ENFORCEMENT DIVISION

Under Oregon Law, the Attorney General cannot act as your private attorney or give you legal advice. Deadlines may prevent you from starting a lawsuit if you wait too long. Filing this complaint does not change those deadlines or guarantee the results you want. You may wish to contact a private attorney.

- 1. Please use dark ink. Type or print clearly.**
- 2. Return this form with copies of important papers.**
- 3. Keep your original papers.**
- 4. Attach any additional explanation.**

Jeffrey Tufenkian  
First Name Last Name

PO Box 97  
Mailing Address

Portland OR 97207  
City State Zip

503-954-1691 same 503-706-8711 jeffrey\_tufenkian@yahoo.com  
Day Phone Evening Phone cell phone number e-mail address

Trump University  
Name of Business or person about which you are complaining

40 Wall Street, 32nd Floor  
Mailing/Street Address

New York NY 10005  
City State Zip

212-248-1800  
Phone

RECEIVED BY  
CONSUMER FRAUDS & PROTECTION BUREAU  
SEP 03 2009  
NYC OFFICE OF THE ATTORNEY GENERAL  
NEW YORK CITY OFFICE

Date of Transaction(s): April 13, 2008 How much money, if any, do you believe you lost? \$35,000

Whom have you contacted concerning your complaint?

Attorney  Business  Other

No Action requested. I just wanted you to know of a questionable practice.

What type of sale was this transaction? Door-to-Door Telephone Fair/Tent Sale

Mail Order Seminar  Mailer Retail Internet Other

61141 EZT C304 E1

000147

**DETAILS OF COMPLAINT**  
(attach additional pages if necessary)

If your complaint is about a cell phone account, please list the cell phone number here. \_\_\_\_\_  
see attached documents for details

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Please be advised that this complaint will become part of our permanent records. Consumer complaints may be released to the business or person about whom you are complaining, members of the public or other agencies attempting to establish ongoing patterns or practices which violate Oregon's Unlawful Trade Practices Act. This form is also subject to Oregon's Public Records Law and may be disclosed to persons who request to review its contents.

\_\_\_\_\_ Your Signature 4/16/09 Date

Oregon Department of Justice  
Financial Fraud/Consumer Protection Section  
1162 Court St., N.E.  
Salem, OR 97301-4096

**MAIL YOUR COMPLAINT TO:**

**000148**

# KIVEL & HOWARD LLP

ATTORNEYS AT LAW

P.O. BOX 40044

PORTLAND, OREGON 97240

FACSIMILE (503) 802-4757

TOLL FREE TELEPHONE (800) 699-9025

TELEPHONE (503) 796-1225

March 25, 2009

Jack Mahoney, Vice President  
Sales & Service  
Trump University  
40 Wall St., 32<sup>nd</sup> Fl.  
New York, NY 10005

Re: Jeffrey Tufenkian  
Our File No.: 242273

Dear Mr. Mahoney:

Jeffrey Tufenkian signed up and paid for the "Gold Elite" package for \$35,000.00, based on promises it would successfully launch his real estate investment business through specific promised deliverables, primarily of mentorship. Promises of mentoring included the trainer, James Harris, saying that the mentor would walk Mr. Tufenkian through the first deal to completion. Mr. Harris said specifically that during the mentorship visit, Rick McNally would help Mr. Tufenkian:

1. Walk through, run numbers, and analyze properties;
2. Write offers, go to contract on properties;
3. Interview sellers, attorneys, and others;
4. Help Mr. Tufenkian write multiple contracts to purchase several properties at the same time;
5. Set Mr. Tufenkian up with a lifelong investor plan; and
6. 90 days after the 3 day visit, a follow up with both Mr. McNally and Mr. Harris to make sure the first property gets sold.

The promised mentoring visit did not do what was promised. Of the six preceding specific points, only one was done, and at a minimal level. The advice given

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Jack Mahoney, Vice President  
Sales & Service  
Trump University  
March 25, 2009  
Page 2

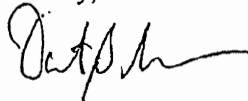
by Mr. McNally to Mr. Tufenkian was patently wrong and not appropriate to his situation. Mr. Tufenkian tried to get some follow-up advice from Mr. McNally after the mentorship visit. Emails to Mr. Harris to get his promised marketing package were only responded to by urging Mr. Tufenkian to finish his payment in order to be "paid in full." Mr. Harris never fulfilled his promise to send materials, nor was he involved in helping Mr. Tufenkian get or sell a deal as he promised in the training. Mr. Harris stopped completely responding to Mr. Tufenkian's emails once Mr. Tufenkian finished paying fully for the program.

Your company's failure to provide services as promised is potentially a violation of the Oregon Unlawful Trade Practices Act (UTPA), enjoined by ORS 646.607. Such a violation may expose your company to civil penalties. Additionally, the UTPA gives Mr. Tufenkian a civil cause of action, which could result in an award of damages, as well as attorney fees.

In reliance upon your company's explicit promises, Mr. Tufenkian has incurred costs well in excess of \$35,000.00. He will forego pursuing damages under the UTPA and will consider this matter closed upon the prompt refund of his original \$35,000.00. Refund may be mailed in care of this office. Your response is requested within fourteen (14) days of the date of this letter.

If you choose to respond to this office, please do so only in writing.

Sincerely,



Donato B. Masaoy III  
Attorney at Law

DBM: tsm  
cc: Jeffrey Tufenkian

000150

## Jeffrey Tufenkian

PO Box 97

Portland, Oregon 97207

phone: 503.954.1691

fax: 503.954.1628

email: jeffrey\_tufenkian@yahoo.com

vla fax

27 February 2009

Brad Schneider  
Director of Service Fulfillment  
Trump University  
40 Wall St., 32<sup>nd</sup> floor  
New York, NY 10005

Dear Brad,

In follow up to my faxed letter dated 18 December 2008 (copy follows here) and my conversations with Jason Schauer and yourself in January 2009, I am following up to reiterate the failure of Trump University to deliver on its promises and again request a refund of what we have paid.

I appreciated you hearing and discussing our concerns on the phone and I heard your suggestion of attending an additional live training. After we spoke, I considered your suggestion. However, as I indicated on the phone, my concerns still remain that the program we were promised with the mentoring as the overwhelming primary piece of the "Gold Package" was an utter failure. Adding an additional large group training will in no way make up for the bad mentoring process we had and the overall failure of the program to live up to what was promised us.

It's as if we paid a large amount for a fully functional, high performance sports car and what was delivered was instead only a non-working engine and nothing else. Instead of a proper car as was promised, you want to send some more random parts. That is not a solution. The engine doesn't even work and we expect a refund of what we've paid.

I know you have people sign that they understand that no specific assurances of profitability or success with your strategies or investments we undertake, however, the clearly conveyed intention of Trump University is to help people be financially successful with real estate and other business ventures. We did not sign up for this program to be entertained. We signed up to get the tools we need to succeed with our real estate business—something we've been committed to since before this training.



Further, your trainer, James Harris, clearly set up that through the Trump University program, we should expect to get at least one \$25,000 real estate deal per month and the larger ones will begin coming from there. The bottom line is we believed and trusted that this program—with the mentorship as the key centerpiece and focus—would help us get quickly on track to have this kind of success. It is only for this reason that we paid this fee and signed up for this program. As indicated in my previous correspondence and in my conversations with you and Jason, I have explained that the mentor we had did only a small fraction of what was promised that the mentor would do.

Although we have put a huge amount of work with dozens of offers and effective marketing, and plenty of intelligence and skill, our overall experience with the program has been a total failure. As such, we have completely lost confidence in the Trump University program and are thus requesting this refund.

Based on the concerns you raised on the phone (that we've already used some of the offerings), I am willing to accept a somewhat smaller refund. Based on us attending the Quick Turn retreat and phone coaching we received I am currently willing to accept \$31,000 of the \$35,000 we paid, **if and only if we have received our refund by 13 March 2009**. The market price for those items (coaching and 1 retreat) would be much less than that except for all the advertising Trump University does and the fame of Donald Trump's name. Since we paid \$1995 for the foreclosure training which is MUCH more marketable than the Quick Turn retreat or coaching, reducing what is owed to us by \$2000 each is more than fair.

To reiterate what I said on the phone, the 12 coaching sessions (and all the retreats) were promised to be included in the Gold Package by James Harris if we signed up that day, which we did. Jason was there when he said that and I have it in my notes as do others I'm in touch with from that training.

Payment can be made either by sending a check (PO Box 97, Portland, OR 97207, made out to my name) or by crediting back the credit cards I used—in either case we should receive it by the 13<sup>th</sup> of March 2009. If we do not receive a refund of at least \$31,000 by 13 March 2009, we plan to include in our demands the other costs and expenses we've incurred and will incur as a result of the problems with your Trump University program.

As I stated before, the Trump University program has set us back farther than if we had not had a mentoring at all since it sent us in a wrong direction from which we had to recover and restart. We have had to take on other courses and mentoring to get us going in a productive direction. And it has been extremely costly in terms of our time, money and our personal well-being.

As I conveyed on the phone, I expect that Trump University is a company of integrity. I assume that it intends to live up to its promises and properly rectify its failures and problems. Please take an opportunity to set this problem right and grant us the refund we deserve. You will gain much more in taking care of upset customers than you will ever gain by keeping our money.

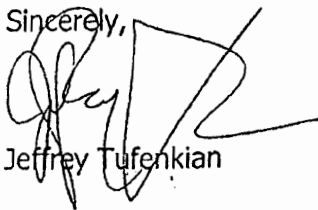
I have recently found many other students who have been extremely disappointed by their experience with the Trump University programs. I was surprised to also learn that Trump University is not a member of the Better Business Bureau and actually has an "unsatisfactory" rating with the BBB due to failing to resolve complaints. I hope you see that it is in your best interest to provide a timely refund in the case of this problem.

We look forward to your timely response and refund of \$31,000 by 13 March. At least this will partially make up for the huge cost in time, energy and money we have suffered.

Please let me know when you have sent the check or credited back my cards.

If, however, you refuse to provide a prompt refund, also please inform me so I may begin taking the further actions necessary to resolve this problem. Let me know if you have any questions.

Sincerely,



Jeffrey Tufenkian

## Jeffrey Tufenkian

PO Box 97

Portland, Oregon 97207

phone: 503.954.1691

fax: 503.954.1628

email: jeffrey\_tufenkian@yahoo.com

Via fax: page 1 of 4, 212-248-0782

18 December 2008

### Customer Service

Trump University  
40 Wall St., 32<sup>nd</sup> floor  
New York, NY 10005

Dear Trump University Customer Service Representative,

I am writing to complain about the Trump University program and to request a refund of the \$35,000 I paid for your Gold Elite package. The program completely failed to live up to its promises, and therefore I am requesting a full refund of \$35,000 and I expect to receive it by check (PO Box 97, Portland, OR 97207) or by crediting back the credit cards I used by the 31<sup>st</sup> of December 2008.

I am not requesting a refund of the \$1995 foreclosure training as it lived up to what it was supposed to be. I am also not currently requesting compensation for the thousands of dollars spent in interest for the \$35,000 Gold Elite package the Trump staff encouraged me to put on my credit cards. Further, am not now requesting compensation for the time and energy we've wasted, and anguish we've experienced due to signing up for this program and it's failure to support our success in the way that it promised.

I have bought, fixed and sold four properties BEFORE I did this course—all for a good profit. I came into this with some experience and have put a tremendous amount of effort into this business and learning what information has been shared with me. So far I've made close to 30 offers and had one property under contract that I marketed heavily but had to cancel because I wasn't able to get a new buyer to assign it to. Unfortunately, my Trump University experience has added extremely little to what knowledge and abilities I have in real estate investing.

I attended, with my wife, the Portland, Oregon foreclosure training lead by James Harris in April this year (for which I paid an additional \$1995). At the end of the 3-day training we signed up and paid for the "Gold Elite" package for an additional \$35,000 based on the promises it would successfully launch our real estate investment business through the specific promised deliverables primarily of the mentorship.

I believe we got some helpful information from the program—namely the Quick Turn retreat was largely informative and the phone coaching sessions seem like they may provide some benefit—but the program as a whole—and especially the mentoring—has been an absolute, utter waste and completely failed to live up to its promises.

I trusted that with a name like Donald Trump behind the program and with what seemed to be an informative training by James Harris, the program would be set up to help people actually succeed.

I have been involved in training programs and know the importance of working with people to be complete and have success early on. I assumed that this program was the high-level it promised to be and that it would live up to its promises of the process and help us complete at LEAST one transaction. This proved to be far from the case—the program in retrospect seems very well tuned and set up to succeed in getting the students to sign up and pay in full while the promised training is just going through the motions and not even doing a fraction of what was promised.

At the foreclosure training, we were encouraged and coached to raise our credit card limits for the purpose of “buying real estate” only to have us max out our new limit with purchase of this program. The irony is of course, that with the cards maxed out on training, there is no way to use the credit for real estate and even worse, it reduces my score and makes it harder to get more cards or credit until it is paid off. So, while promising to be helping us become financially free, the reality is that it helps us become financially chained to debt (I had been debt-free for years until these charges for your courses in the spring; since then I’ve been paying hundreds of dollars in interest every month while I’ve received no proper support to succeed in real estate from Trump University).

I and others were taking very complete notes by computer through the training, so we recorded what was promised. Promises of mentoring from the Foreclosure training in April of this year included: The trainer (James Harris) saying that the mentor will walk us through the first deal to completion. James said specifically, “during the mentorship visit Rick (McNally) will:

1. help walk you through, run numbers and analyze properties,
2. write offers, go to contract on properties;
3. will interview sellers, attorneys, and others;
4. will help you write multiple contracts to purchase several properties at the same time; and
5. will set you up with a lifelong investor plan.”

James continued to say that, “90 days after the 3 day visit, there will be a follow up with Rick and James to help make sure it (your first property) gets sold.”

Although Rick is a nice, pleasant guy, and he and Mike (who came along) gave us some materials and information that seem to be somewhat helpful, the much promised and awaited mentoring visit didn’t do what it was promised at all. We spent most of two

days just walking through houses. The vast majority of the promised things the mentor would help us do never occurred though we were more than ready and able. Of the five specific points that we were told the mentoring would cover (quoted above), only one was actually done and that one (helping us run numbers and analyze properties) was barely done with us (we analyzed about two properties together). The most important claim made over and over in the pitch for the program was that the mentor would help us see at least one deal through to completion so we would have the experience to do it on our own. This was far from the case in our mentoring experience as by the end of the third day, even though we were extremely well prepared and eager, Rick only took us as far as analyzing a couple properties and we were left to prepare offers on our own.

Further, the advice given by Rick to us was that we should qualify for taking a loan in our own name even though I told him how little income we had this year and about the blemishes I have on my credit score. He and Mike insisted that their mortgage broker could get us a loan. So we called their person and he said we absolutely would not qualify for a SFH (what we were primarily looking at with Rick) and the only thing we could potential qualify for could be a 4-plex in which the other units would more than pay for the loan payments (but we'd have to pay down the debt I had from the Trump University program and I didn't have the cash to do that). Also, the principal broker of the realtor we started working with refused to let us do multiple offers and refused to let us make offers with such a low earnest money level. He also restricted us from non-traditional offers (lease-option, seller financing, etc.). So the whole direction Rick tried to set us up to take was a wrong direction and not appropriate to our situation.

I tried getting some follow-up advice from Rick after the mentorship. Often he'd return or answer my call, sometimes after several attempts by me. He was always cordial, but these calls were brief and not very helpful. It never came close to the mentoring we were supposed to have. After I got wrong advice from him (Rick said I should judge the value of a 4-plex based on \$/square foot NOT rental income and costs), I stopped even trying to consult him or communicate with him at all. He never called or emailed me for any follow up after that (and only before that when I initiated it). Despite the commitments made, Rick never followed up to help us get a property sold, under contract or anything else.

James was very eager in the training before we signed up, but emails to James following up to get his promised marketing package were only responded to by urging me to finish my payment in order to be "paid in full". After that, my emails to him went unanswered and he never fulfilled his promise to send his materials (even though I reminded him by email), nor was he involved in helping me get a deal (or sell it) as he promised in the training. He completely stopped responding to my emails once I finished paying fully for the program.

I am generally a very positive person and I genuinely do what I can to make something work. I refrained from complaining earlier to see if I could make the best of this real estate investing business and (with coaching from another organization) I made a bunch of offers and got a house under contract. Other people—for little or no money—

have given me much more help than I got from Trump University. I also didn't want to admit that I had been foolish to trust Trump University to be true to their promise and provide a successful program worth the high price tag. Unfortunately, my trust was ill placed.

Overall, the Trump University program has set us back farther than if we had not had a mentoring at all since it sent us in a wrong direction from which we had to recover and restart. We have had to take on other courses and mentoring to get us going in a productive direction. And it has been extremely costly.

We look forward to your timely response and full refund of \$35,000. At least this will partially make up for the huge cost in time, energy and money we have suffered.

Please let me know when you have sent the check or credited back my cards. If you disagree with providing a prompt refund, also please inform me so I may take further action. Let me know if you have any questions.

Sincerely,

Jeffrey Tufenkian

Print

<http://us.mg2.mail.yahoo.com/dc/launch?.rand=7g11rhuguhse>

From: Trump University (noreply@trumpuniversity.com)  
To: jeffrey\_tufenkian@yahoo.com  
Date: Sunday, April 13, 2008 5:59:01 PM  
Subject: Trump University - payment confirmation



April 13, 2008

Thank you for your purchase from Trump University.

**Order Detail**

Order Number: 494166  
Order Date: 04/13/2008

Item	Quantity	Amount
Trump Gold Elite	1	34995.00
Investor's Edge Software	1	0.00
Enrollment: Wealth Preservation Advanced Training	1	0.00
Enrollment: Quick Turn Real Estate Advanced Training	1	0.00
Enrollment: 3 Day In-Person Field Coaching	1	0.00
Enrollment: Commercial & Multi-Family Advanced Training	1	0.00
Real Estate Investor's Edge Software- Welcome letter	1	0.00
	<b>Subtotal</b>	<b>\$34,995.00</b>
	Shipping	\$0.00
	Tax	\$0.00
	<b>Total</b>	<b>\$34,995.00</b>

We have received a total payment of \$20,000.00 for this order.

You will receive additional e-mail notification when your items are shipped.

If you have any questions about Trump University products, please click the following link:  
<http://www.trumpuniversity.com/shop/index.cfm>

Most basic questions about Trump University can be answered by visiting our FAQ's at the following link: <http://www.trumpuniversity.com/company/faq.cfm>

If you still have an unanswered question, please contact [Productsupport@trumpuniversity.com](mailto:Productsupport@trumpuniversity.com), or call 877-508-7867, 9 am - 6 pm (EST).

Visit <http://www.trumpuniversity.com> for exclusive content and an ever-expanding roster of products and services.

# Exhibit K28



**AFFIDAVIT OF PAUL A. WARD**

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

PAUL A. WARD being duly sworn, deposes and says:

1. I reside at 27 Watson Ave., Ossining, New York 10562.
2. I make this statement concerning the business acts and practices of Trump University (“Trump”) of my own knowledge.
3. I received an advertisement for Trump to attend a three-day seminar on how to make money from foreclosures. My mother was a real estate broker for twenty years so I was familiar with real estate, and Trump’s promotional materials made it seem that getting involved in foreclosure market could be profitable.
4. From reviewing Trump’s promotional materials, I expected Trump to deliver the material professionally, to provide the promised support, and to conduct itself with integrity. From reviewing Trump materials and its web site, it was my understanding that Trump was a university accredited by the New York State.
5. I attended the three-day seminar “Fast Track to Foreclosure Investing” on March 13 – 15, 2009, at The Westin New York at Times Square at 270 West 43<sup>rd</sup> Street in New York, for which I paid \$1,495. Mr. Harris invited the attendees to come and join Trump, to be “on the inside” and part of the “Trump family.” He suggested that Trump would provide us with special access and contacts, including the opportunity to become early investors in new real estate ventures with Donald Trump and others.
6. During the presentation, Mr. Harris encouraged the participants to increase their credit card limits while on lunch break. He said that one cannot have enough credit

if one wants to purchase real estate, so everyone should ask for more no matter what they had already.

7. I called each of my credit card companies to request a higher credit limit, which resulted in many inquiries on my credit cards. These inquiries were brought to the attention of the credit card companies and instead of increasing my credit card limits, the companies cut them substantially. I was infuriated with Trump for giving us such bad advice.

8. During the three-day seminar, Trump pushed the mentor program heavily. Two or three mentors, among them Steve Gilpin, were available to talk to us about Trump Elite programs. These mentors were extremely confident, and when I asked Mr. Gilpin what percentage of people that he undertook were successful, he answered that 92 (or 93) percent of people he mentored were successful.

9. After the three-day seminar, the speakers recommended strongly that we subscribe (through a monthly subscription) to Trump's website, which had a lot of information about real estate investing and the foreclosure market and how money could be made in it. I subscribed Trump's software for \$34.95 per month and found it to have some useful content.

10. During the three-day seminar, I signed up for the Gold Elite mentorship for which I paid \$25,000 for three full days with the mentor and access to the mentor and to Trump's staff for one year afterwards. I was told "welcome to the family" and received cheers from Mr. Harris and other Trump employees.

11. Steve Gilpin was my mentor, but I think he benefited more from our relationship than I did.

12. Before Mr. Gilpin came out to look at properties with me near my home, we spoke on the phone and went over some formulas to understand how to determine property values. As he went through this material on the phone, I prepared a spread sheet for performing assessments. His own instructions were difficult to follow, so we were using my spreadsheet when we looked at properties to track value and assess the properties seen.

13. We saw about twenty houses over the course of three days. One property that we looked at had similarities to a deal that Mr. Gilpin was in the process of working on. He showed me the report on his property that would be used for investors and for obtaining legal documents. Included in the report were architect's drawings and write-ups of Mr. Gilpin's qualifications, brief history and goal for the new investment. The architect's drawings were grossly inaccurate as far as the location of windows, doors and contained other obvious structural inaccuracies. The write-ups were poorly drafted and seemed amateurish to me. I pointed out these criticisms to Mr. Gilpin and provided corrected and enhanced/improved documentation.

14. When I started looking for traditional lenders, all of them wanted to know whether I could personally afford a mortgage, but I could not afford much. I started working on a pair of houses, which I negotiated to what I expected to be an affordable price, but due to the property's investment intent, the bank I intended to use (Wells Fargo) was not willing to extend a loan for the amount originally requested. As time passed and it became obvious that I wouldn't be able to come up with the cash shortfall to make a traditional loan work for the balance, I pulled out of the deal to retain my down payment.

15. I asked Mr. Gilpin for his recommendation on how to find financing, and he suggested that I look at GoBigNetwork.com which published a list of venture capitalists who invested in real estate deals. I subscribed to this service for \$60 per month and tried it for several months, but they would only deal with “seasoned” real estate investors, not anyone starting out.

16. After our three-day mentoring session, I sent Mr. Gilpin documents on the deal I was working on in Peekskill, New York, but did not receive any feedback from him. I had no substantive conversations with him after the mentoring session. Although we were promised that our mentors would be readily available to us for a full year, Mr. Gilpin was largely not available and when I did finally reach him, he was not helpful.

17. Mr. Gilpin requested that I fill out an evaluation for him and hoped it would be a good one. I filled out that evaluation, but I do not recall whether I actually mailed it to Trump. It was not a glowing review because at the end of my mentoring experience with Mr. Gilpin, I felt that I did not know what to do next. I spent a lot of time looking at different properties, and it took eight months to get a deal together, which I was unable to finance.

18. I made several calls to Trump telling them that things were not moving and that I was getting no support from Mr. Gilpin. Over the course of the year, I spoke to Jason Schauer, Brad Schneider and Paul Reisner and others at Trump. But no one at Trump was of any help when it came to finding financing for my deal.

19. I did not get the value for my money. I put \$25,000 on my credit card and am still paying off the debt. Due to lack of financing, I was unable to close any deals.

20. Up until the mentor program, there was a warm welcome-to-the-family feeling from the organization. But after paying a substantial amount of money for a mentor, I felt like I was left high and dry.

  
\_\_\_\_\_  
PAUL A. WARD

Sworn before me this 19<sup>th</sup> day of Sept, 2012

  
\_\_\_\_\_

Notary Public

State of NY

My Commission Expires: 7/7/15

**NANCY TEJADA WARD**  
Notary Public, State of New York  
No. 01TE6095289  
Qualified in Westchester County  
Commission Expires July 7, ~~2007~~  
2015

# Exhibit L1



Better Business Bureau  
Serving Metropolitan New York, Long Island, and the Mid-Hudson Region

30 East 33rd Street  
New York, NY 10016  
(212) 533-6200  
FAX  
www.newyork.bbb.org

**Case #:** 8071014

**Consumer Info:** andreev, krassin  
3127 Atatumnjoy dr  
PEARLAND, TX 77584  
2815097439  
vessius@yahoo.com

**Business Info:** Trump University  
40 Wall Street 32nd Floor  
New York, NY 10005  
-

**Date Filed:** 1/5/2010

**Nature of the Complaint:** Advertising Issues

**Consumer's Original Complaint:**

KRASSIN ANDREEV

I demand a full refund of all my hard earned money from Trump University.

Trump university has proceeded to stop any kind of support or service online or Offline although we paid \$16,000 to them. Their service should've continued until June of 2010. However we hadn't have any support for over 3 months.

In attempt to speak with their representative we had to go through a game where the customer service people would try to hide the school director and make him unavailable.

Trump University scammers did a call with me and my wife she can testify too if needed and quote" Would you like to make 150k or 200k with our system in 3 to 6 months?

Right there the flag should've gone up, but their smooth talker Don Rud continued confidently that this results will be no-brainer to achieve in short period of time.

Then they proceeded to advise that if we invest in such and such quote "low class neighborhood, no black neighborhood, kids or no kids neighborhood and so forth we will have certain results.

The discrimination and neighborhood people naming is unbelievable. After the racial and class remarks one should've wandered if should do business with this people.

Trump University and their staff should be ashamed of themselves! They RUINED my credit!!! They told me I would get my large investment back in my first real estate deal because I would have access to amazing mentors and course content. I maxed out my credit cards because I thought Donald Trump wouldn't have such a sorry excuse for a school just to make more money. The only help for maxing my cards was that I could pay for their fee

000166

**Consumer's Desired Resolution:**

I demand a full refund of my money.



**Business/Consumer Response & Rebuttals:**

04/07/2010  
Brad Schneider

Respond to Complaint  
See attached file

---

04/07/2010  
Mr. krassin andreev

The business's response does not resolve my complaint.

Better Business Bureau:

I have reviewed the response made by the business in reference to complaint ID# 8071014, and have determined that this does not resolve my complaint.

To assist the BBB in bringing this matter to a close, please explain why this does not resolve your complaint:

The program didn't not achieve what it is supposed to achieve

which is giving you a cutting edge advantage to become a savvy investor.

The program consist of simple house viewing which can be done with any local realtor. The person that is conducting the program is not a real estate

investor, but a marketing professional that holds seminars and webinars with a purpose of attracting more people in the net.

The strategy that is thought don't work in the current environment and is outdated style 1970-80 investment technique which is not relevant in the current market. Big part of the execution of the strategy is marketing probably about 90% and no marketing strategy is given. If you go to this site

<http://www.complaintsboard.com/bycompany/trump-university-a84031.html> you will see what I am speaking about. There are more victims than successors in this program.

Sincerely,

Krassin Andreev

---

04/21/2010  
Gillian Birnie

Respond to Complaint  
See attached file

---

**04/21/2010**  
**Gillian Birnie**

Respond to Complaint  
See attached file

---

# **Exhibit L2**



Better Business Bureau  
Serving Metropolitan New York, Long Island, and the Mid-Hudson Region

30 East 33rd Street  
New York, NY 10016  
(212) 533-6200  
FAX  
www.newyork.bbb.org

**Case #:** 782722

**Consumer Info:** Andreu, Riguhey  
908 ne 16th ave  
Fort Lauderdale , FL 33304  
9543193697  
riguheyandreu@comcast.net

**Business Info:** The Trump Entrepreneur Initiative  
40 Wall Street, 32nd Floor  
New York, NY 10005  
(212) 810-7358  
<http://www.trumpinitiative.com>

**Date Filed:** 2/17/2008

**Nature of the Complaint:** Advertising Issues

**Consumer's Original Complaint:**

Consumer claims: According to Mr. Groff; Trump University offered to give us an intensive 3 day training event where the Trainer Mr. Groff would teach us among other things How to set up all the legal aspects to start our real state business. (Step by step) He offer to provide a copy of his personal research and information collected based on his 12 year real state experience. None of the above mention where deliver and after a day and half of direct questions, we where individually requested out of the room to have a 'private discussion about our individual situation' at this point we where offered an addition program for \$35.000 to learn how to do this business.

**Consumer's Desired Resolution:**

**Business/Consumer Response & Rebuttals:**



# Exhibit L3



Better Business Bureau  
Serving Metropolitan New York, Long Island, and the Mid-Hudson Region

30 East 33rd Street  
New York, NY 10016  
(212) 533-6200  
FAX  
www.newyork.bbb.org

**Case #:** 782886

**Consumer Info:** Arroyave, Juliana  
2556 CENTERGATE DR.  
Miramar , FL 33025  
7276881522  
julyarroyave@gmail.com

**Business Info:** The Trump Entrepreneur Initiative  
40 Wall Street, 32nd Floor  
New York, NY 10005  
(212) 810-7358

<http://www.trumpinitiative.com>

**Date Filed:** 2/18/2008

**Nature of the Complaint:** Delivery Issues

**Consumer's Original Complaint:**

Consumer claims: My husband and I attended a seminar by Trump University called 'fast track to foreclosures' in ft lauderdale on feb 15-17. We signed up for the program at a free introduction section they had about 2 weeks before the seminar. The felt to deliver what they promised, for instance: legal documentation on owner financing, poor information on how to set up a business. They even asked the entire group to increase their credit cards limit, and made everyone filled out an application with all our financial information like 401k, savings/checking/money market accounts, credit cards etc...the last day there was a one on one meeting, where they actually suggested we enroll in another 'COURSE' that cost \$35,000 and pay it with the credit cards or accounts. I emailed them but they have not answered. We paid \$1500 but their refund policy is only good for the first day of the seminar. They did not teach the topics on the program they just kept saying 'i will teach you this' 'I will get there' 'sign up for our \$35K program and you will know this'.

**Consumer's Desired Resolution:**

**Business/Consumer Response & Rebuttals:**



# Exhibit L4

RECEIVED BY  
DEC 22 2009  
CONSUMER FRAUDS  
ALBANY OFFICE

Edwin L. Atlas  
5906 Pope Court  
Camp springs, MD 20746

November 16, 2009

Office of the Attorney General  
The Capitol  
Albany, NY 12224-0341  
Attn: Consumer Fraud Division


Dear Sir/Madam,

I am asking you to assist me in recovering monies spent with a Florida-based business called Trump University New York. I hereby assert that this money was collected in an unscrupulous manner.

I was promised services from Trump University New York for approximately \$ 6,000.00. I used my VISA Card for these "services". I assert that these services were never rendered by Trump University New York. I hereby request your help in obtaining a full refund.

I appreciate the opportunity to discuss this issue further with you.

Sincerely yours,



Edwin L. Atlas

RECEIVED BY  
CONSUMER FRAUDS & PROTECTION BUREAU  
JAN 13 2010  
NYS OFFICE OF THE ATTORNEY GENERAL  
ALBANY CITY OFFICE

000177

Atlas  
Trump University New York  
Florida Based Company

- Consumer was promised services from Trump University New York
- Used Visa card – paid \$6,000 doe these “services”
- Services were never rendered by Trump University New York

# Exhibit L5



Better Business Bureau  
Serving Metropolitan New York, Long Island, and the Mid-Hudson Region

30 East 33rd Street  
New York, NY 10016  
(212) 533-6200  
FAX  
www.newyork.bbb.org

**Case #:** 784071

**Consumer Info:** Benabib, Jack  
3206 Calle Largo Dr  
Hollywood, FL 33021  
9549626202  
jbenabib@bellsouth.net

**Business Info:** The Trump Entrepreneur Initiative  
40 Wall Street, 32nd Floor  
New York, NY 10005  
(212) 810-7358  
<http://www.trumpinitiative.com>

**Date Filed:** 2/25/2008

**Nature of the Complaint:** Advertising Issues

**Consumer's Original Complaint:**

Trump University is offering a three-day retreat on Real Estate-Foreclosures for \$1,495.00. The seminar is announced as filled with valued information on how to become a real estate investor purchasing real estate in foreclosure. I attended a recent one in Fort Lauderdale. The information presented during the retreat was completely useless. There is no content of any value and several hours are spent in empty speeches, promises and shallow personal motivational speeches. Most of the time was spent with empty promises for upcoming information and a big sales speech and pre-qualifying for a \$35,000.00 Gold Package. Before and during the seminar I repeatedly asked about the content they had promised and they keep saying it is coming, just stick around. By the end of the seminar, they say that the information we were expecting belongs to a more advance \$5,000.00 class. Most of the attendees feel the same way, several left before the end of the first day and some others during the second and third days. We collected their names and email addresses and an effort in under way to raise a formal complain at the States' Attorney's General office. I have several emails expressing the dissatisfaction over the content and presentation of this seminar. These seminars are a complete scam and are just meant to up-sell their mentoring packages and other seminars. I requested a refund and my request was denied, despite their satisfaction guarantee policy advertised on their website and repeatedly before them getting our credit cards for payment. Please feel free to contact me for any additional information, including a sample of the empty 100+ page power point presentation print out handed out as 40+ years of real estate experience in foreclosures Jack Benabib 954 962 6202 jbenabib@bellsouth.net 3206 Calle Largo Dr Hollywood FL 33012

**Consumer's Desired Resolution:**

**Business/Consumer Response & Rebuttals:**

# **Exhibit L6**



Better Business Bureau  
Serving Metropolitan New York, Long Island, and the Mid-Hudson Region

30 East 33rd Street  
New York, NY 10016  
(212) 533-6200  
FAX  
www.newyork.bbb.org

**Case #:** 819431

**Consumer Info:** Boguski, Robert  
9725 Brewster Lane  
Keller, TX 76248  
8173952477  
robertboguski@yahoo.com

**Business Info:** The Trump Entrepreneur Initiative  
40 Wall Street, 32nd Floor  
New York, NY 10005  
(212) 810-7358

<http://www.trumpinitiative.com>

**Date Filed:** 9/10/2008

**Nature of the Complaint:** Refund / Exchange Issues

**Consumer's Original Complaint:**

\* UPDATE: 09/30/2008:

Unfortunately, Mr Schneider's proposal is not satisfactory for several reasons.

First of all, I never received an explanation over the phone about cancellation policies, and the online FAQ link did not work (better double-check that one).

Secondly, I will not agree to accept coaching at this time. I sent an email request to Trump U for an explanation of the coaching program, specifically requesting a course syllabus and/or schedule. Certainly one can understand that I expect and deserve an itemized proposal before agreeing to enter the coaching program. Their assertion that coaching "is a higher value than the program originally purchased" cannot be proven if they are unwilling or unable to provide me with a satisfactory statement of course content. Also, Trump U needs to tell me exactly how many sessions are involved, including amount of time per session. Their instructor Mr Gilpin told me on the phone that he would agree to eight sessions, but he put nothing in writing. I MUST HAVE WRITTEN GUIDELINES.

Third, I asked Trump U if I would be eligible for a refund, if within thirty days I decided to cancel the coaching. No reply to my question.

Finally, according to Mr. Schneider, they have contacted me many times to set this coaching up but did not receive a respond from me. Mr Schneider, kindly provide a written record of dates/times you attempted to call me, also your records of emails sent from your office to me. Again, I am not going to agree to your coaching proposal until I receive satisfactory written answers to the numerous questions I have asked.

Is there any wonder why I have lost confidence in Trump University? Instructor (Sawczuk) resigns in mid-course,

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a vice president (Quintal) resigns and nobody follows up with emails sent to his address, a woman who answers the phone at Trump U snickers at me, and I cannot get clear, in-depth answers to questions presented to Mr. Sexton, Mr. Gilpin, and Mr. Schneider.

Mr Schneider, I understand your reluctance to return my money, but you are not giving me my money's worth when it comes to instruction or customer service. It's not a good value. You have not persuaded or convinced me that you provide top-notch, cutting edge programs, based on what I saw in the two modules of work I completed.

Your proposal that I accept "phone coaching" is too vague. Absolutely unacceptable. \*

#### CONSUMER STATES:

I enrolled for an on-line course Real Estate Investor Training. I paid in full (\$3600) prior to the beginning date via money order, not credit card, based on reputation and credibility of Trump Organization. After completing two of the six modules, I decided to withdraw and ask for a refund of my unused tuition (\$2400). I was never told that there was a time limit for refund requests; indeed, I perceived their 'policy' as completely arbitrary. I was disappointed by the quality of the instruction; I expected a more intensive, in-depth curriculum. The original Trump U instructor assigned to my class (Mark Sawczuk) resigned from the school, and we received a new instructor (Steve Gilpin) in mid-stream. Because of my non-traditional work hours, I was not able to participate in scheduled 'office hours' and on-line conferences. I e-mailed Vice-President of Trump U Paul Quintal to whom I spoke at length prior to enrollment, only to receive no reply. I phoned, and reached a woman who said, 'He's not here any more'. I e-mailed President of Trump U Michael Sexton who forwarded my refund request to his subordinates Brad Schneider and Mark Covais. Mr. Sexton never contacted me personally. The subordinates refused to authorize a partial refund, telling me that my only options were to accept 'phone coaching' sessions (with a different instructor than Mr Gilpin), or begin the entire program from the beginning. Neither option satisfied me. Within the last two weeks, I e-mailed Trump U and stated that I would begin the program again, if and only if I could receive a different instructor than Mr. Gilpin. As of this writing, no response from Trump U. At this point, I am not interested in remaining as a Trump U student at all. I am disappointed by their failure to communicate in a timely manner. I have lost all confidence in their program. I can provide the BBB with copies of all emails between myself and Trump U.

#### **Consumer's Desired Resolution:**

**Business/Consumer Response & Rebuttals:**



# Exhibit L7



Better Business Bureau  
Serving Metropolitan New York, Long Island, and the Mid-Hudson Region

30 East 33rd Street  
New York, NY 10016  
(212) 533-6200  
FAX  
www.newyork.bbb.org

**Case #:** 780409

**Consumer Info:** Boutin, Bonita  
135 Shippeetown Rd.  
East Greenwich , RI 02818  
4012417320  
bonitag22@gmail.com

**Business Info:** The Trump Entrepreneur Initiative  
40 Wall Street, 32nd Floor  
New York, NY 10005  
(212) 810-7358

<http://www.trumpinitiative.com>

**Date Filed:** 2/4/2008

**Nature of the Complaint:** Refund / Exchange Issues

**Consumer's Original Complaint:**

Consumer states: Back in July 2007, I was interested in attending a Commercial Real Estate seminar through Trump University. I had to put a down payment of \$1,250.00 to secure my spot. However, because of some personal issues going on at that time, I was not able to attend any of the seminars in 2007. I spoke with Brad Schneider at the time and asked for my deposit back. He suggested that since the prices of the seminar would probably increase in 2008, they should hold my deposit to keep the 2007 rates. I said that was fine even though I was not sure when and if I would be able to attend. I am still not able to attend any of the retreats over the next few months due to the same personal and financial reasons and have been asking for my deposit back. I wrote e-mails on 1/8 to Lillian Hernandez (another person I spoke with during that time). I also sent e-mails to Brad Schneider on 1/14, 1/20, 1/23. Moreover, I made phone calls in between these times but never received any phone calls back. I received one e-mail response from Brad Schneider on 1/17 stating that he would ask his controller. I never heard from him again. On January 29th I called and spoke with a random person who informed me that he would call back the next day, however, I had to call him back and he connected me directly to Brad Schneider. He told me that there was a 30 day refund policy, so that is why I was having the problem. However, if, back in July, anyone would have told me about this refund policy, I would have never let them hold my deposit and would have taken it back in spite of chances to pay a higher fee. I sent an e-mail to Brad Schneider on January 30th explaining that I was never told about refund policies. I have not heard from him since. I want my deposit back, as I was never informed about refund policies of any kind during any of the sales discussions I had with anyone!!!

**Consumer's Desired Resolution:**

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**Business/Consumer Response & Rebuttals:**

# Exhibit L8



Better Business Bureau  
Serving Metropolitan New York, Long Island, and the Mid-Hudson Region

30 East 33rd Street  
New York, NY 10016  
(212) 533-6200  
FAX  
[www.newyork.bbb.org](http://www.newyork.bbb.org)

**Case #:** 784028

**Consumer Info:** Brown, Gloria  
527 W Church Rd  
King Of Prussia , PA 19406  
6102653466  
gdevabrown@aol.com

**Business Info:** The Trump Entrepreneur Initiative  
40 Wall Street, 32nd Floor  
New York, NY 10005  
(212) 810-7358

<http://www.trumpinitiative.com>

**Date Filed:** 2/25/2008

**Nature of the Complaint:** Refund / Exchange Issues

**Consumer's Original Complaint:**

The Consumer States: Trump University has refused to credit back to me the \$3,600.00 they previously said they would for a refund for classes that did not serve my interests and for which I did not complete for that reason. I have been in touch with them about this repeatedly since October by phone and email. I had American Express dispute the charges back in October. Their representatives, Jason Schauer and CEO David Highbloom (the one who offered to refund my money if I was not satisfied with the course I paid for) have refused to reply to my emails. The only call I received recently was Jason saying he would not refund the money. He has since not replied to me. When I signed up for their course I was told that the interests I specified would be addressed in the course.

**Consumer's Desired Resolution:**

**Business/Consumer Response & Rebuttals:**



# **Exhibit L9**



Better Business Bureau  
Serving Metropolitan New York, Long Island, and the Mid-Hudson Region

30 East 33rd Street  
New York, NY 10016  
(212) 533-6200  
FAX  
[www.newyork.bbb.org](http://www.newyork.bbb.org)

**Case #:** 785301

**Consumer Info:** Brozowski, Patricia  
15164 SW 13th place  
Sunrise, FL 33326  
9543821502  
[annabellesasha@yahoo.com](mailto:annabellesasha@yahoo.com)

**Business Info:** The Trump Entrepreneur Initiative  
40 Wall Street, 32nd Floor  
New York, NY 10005  
(212) 810-7358

<http://www.trumpinitiative.com>

**Date Filed:** 3/3/2008

**Nature of the Complaint:** Service Issues

**Consumer's Original Complaint:**

The consumer states: I attended a seminar to find out what the three day (\$1495) charge would entail. One of the seminar speakers told me that the program was fantastic and I would definitely make money and probably leave with a deal during the weekend. Because of the Trump name and what the salesman told me, I accepted his pitch. I had an opportunity to walk out after the 1st day with a full refund, but he promised more on the 2nd day. Full disclosure was not given until the last day. We were asked to fill out a financial report of how much credit we had on credit cards and what was available and what was owed. Then we were given the offer to pay one of the speakers to be our personal mentor for a whopping \$25k. The whole weekend was spent listening to salesmen sharing their stories of personal wealth and pictures of their rich lifestyles. All I wanted was to learn, after all, I was at Trump University. On Tuesday, I called the hotline which was supposed to be available to us for questions. The first time it was, the second time I was told that I needed a coach (\$3K) and the person to whom I was speaking could not be answering my questions so often as he had 60 paying coaching customers to call that day and it wouldn't be fair to them. I called and spoke to several people at Trump over a period of 2 weeks regarding a refund. They said they would get back to me. After waiting several days, I called today and was told that a refund would not be possible.

**Consumer's Desired Resolution:**

**Business/Consumer Response & Rebuttals:**



# **Exhibit L10**



# LISA MADIGAN

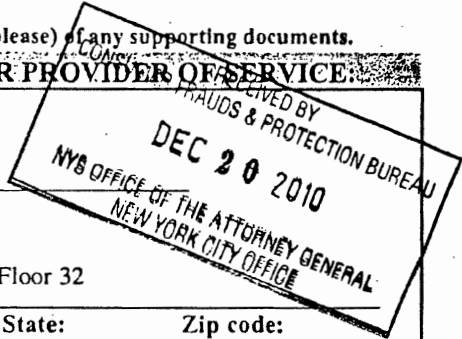
Illinois Attorney General  
 Consumer Fraud Bureau  
 500 South Second Street  
 Springfield, IL 62706  
 217-782-1090  
 1-800-243-0618 (Toll free in IL)  
 TTY: 1-877-844-5461  
[www.IllinoisAttorneyGeneral.gov](http://www.IllinoisAttorneyGeneral.gov)

Office Use Only	
CLMS:	<u>279092</u>
AG:	_____

Fill out the form online, then print and mail to the address above. Include copies (no originals please) of any supporting documents.

## YOUR INFORMATION: NAME OF SELLER OR PROVIDER OF SERVICE:

<b>Name: Mr., Mrs., Ms. (circle one)</b> Daniel D. Carr <b>Address:</b> 17113 Whittier Ave. <b>City: State: Zip code: County:</b> Hazel Crest, IL 60429 Cook County <b>Your Telephone Number:</b> Daytime ( 708 ) <u>574-1063 (708) 446-8553</u> Evening ( ) _____ <b>Your e-mail address (optional):</b> dimianocarrd77@yahoo.com <b>Are you a senior citizen?</b> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> <b>Who referred you to this office?</b> My attorneys at Sonnenschein Nath & Rosenthal	<b>Name:</b> Trump University <b>Address:</b> The Trump Bldg, 40 Wall St., Floor 32 <b>City: State: Zip code:</b> New York, NY 10005 <b>Telephone (212 ) 937-3830 / (212) 248-1800</b> <b>Website:</b> www.trumpuniversity.com <b>Additional seller or provider of service involved in transaction:</b> <b>Name:</b> Paul Reisner <b>Address:</b> Unknown <b>City: State: Zip code:</b> <b>Telephone (212 ) 937-3830 or (212) 248-1800</b> <b>Website:</b> www.trumpuniversity.com
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Has this matter been submitted to another government agency, an arbitration service, or to an attorney? Yes  No   
 If yes, please give name, address, telephone number #. \_\_\_\_\_  
 Is court action pending? Yes  No

## INFORMATION ABOUT THE TRANSACTION

**Date of Transaction:** 2/17/2010, 2/28/2010, 3/16/2010  
**Did you sign a contract?** Yes  No  (If yes, please attach a copy)  
**Date contract was signed:** 2/17/2010, 2/28/2010, 3/16/2010  
 Was the product or service advertised? Yes  No  When? \_\_\_\_\_ (Please attach a copy of the advertisement, if available)

<b>How was the service advertised?</b> Newspaper/magazine Radio advertisement Television advertisement Internet advertisement E-mail solicitation <input checked="" type="checkbox"/> Direct mail solicitation Telephone solicitation Yellow pages of the telephone book Facsimile solicitation Door-to-door solicitation Display at merchant's place of business Display at a trade show/convention, etc. Other _____	<b>Total Cost of product/service:</b> \$ <u>18,495</u> <b>Amount paid to date/down payment:</b> \$ <u>18,495</u> <b>Method of payment (check one) (Please attach a copy)</b> Cash <input type="checkbox"/> Check <input type="checkbox"/> Money Order <input type="checkbox"/> Credit Card <input type="checkbox"/> Debit Card <input checked="" type="checkbox"/> Bank Draft <input type="checkbox"/> Wire Transfer <input type="checkbox"/> Automatic Debit <input type="checkbox"/> Other _____ <b>If you paid with a credit card, have you contacted your credit card company to register a dispute?</b> Yes <input type="checkbox"/> No <input type="checkbox"/> <i>(Under the Federal Fair Credit Billing Act, you have 60 days from the time that you receive your statement to dispute the charge.)</i>
---	---

<b>Where did the transaction take place?</b> At my home <input checked="" type="checkbox"/> Over the telephone By mail Over the Internet Trade show/convention/home show At the firm's place of business <input checked="" type="checkbox"/> By facsimile <input checked="" type="checkbox"/> Other (please specify) <u>Trump Seminar</u> There was no transaction	Have you complained to the company or individual? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>  If yes, provide name and phone number of the individual(s): <u>Trump University Headquarters</u> <u>(212) 248-1800 and (212) 937-3830</u> <u>Paul Reisner (direct dial unknown)</u>
---	--


FOR COMPLAINTS REGARDING MOTOR VEHICLES, PLEASE COMPLETE THIS BOX:					
Make:	Model:	Year:	New: Yes <input type="checkbox"/> No <input type="checkbox"/>	As-Is: Yes <input type="checkbox"/> No <input type="checkbox"/>	
Warranty: Yes <input type="checkbox"/> No <input type="checkbox"/>	Name of Extended Warranty:	Purchase Date:	Current Mileage:	Mileage at Purchase:	
Expiration Date:					

Briefly describe the transaction and your complaint. You may use additional sheets if necessary. **Please attach copies of all contracts, letters, receipts, cancelled checks (front and back), advertisements, or any other documents that relate to your complaint. PLEASE DO NOT SEND ORIGINALS.**

I am an Iraq war veteran who suffers from severe PTSD and am unable to work due to my disabilities. Currently, I receive service-related disability benefits from the government (I am being represented by attorneys Keith Moskowitz and Mariam Farah of Sonnenschein Nath & Rosenthal on a pro bono basis with respect to my claim for VA benefits). In approximately early February, I received an advertisement in the mail from Trump University. On February 17, 2010, I signed a contract in the amount of \$1,495.00 to attend Trump University's Apprenticeship Program being held that same day at the Hilton in Oak Lawn, IL. (Apprenticeship Program contract attached as Ex. 1.) Subsequently, on February 20, 2010, I was admitted to Jesse Brown VA psychiatric Unit as a result of my PTSD and because I was experiencing suicidal thoughts. (See letter from my treating psychiatrist attached as Ex. 2.) After spending five days in the psychiatric unit, I was discharged home. Shortly thereafter, I received a call on my cell phone from an employee of Trump University, encouraging me to attend a seminar taking place on February 28, 2010, at the Westin in Lombard, IL. During that seminar, I was pressured by employees of Trump University to join the so-called Gold Elite program. Consequently, I signed a contract in the amount of \$34,995.00 for enrollment in Trump University's Gold Elite Program, and used my debit card to make a downpayment of \$17,000.00. The next day, on March 1, 2010, I contacted Trump University Headquarters in New York and told them that I wanted to cancel the contract. The person I spoke to kept transferring me to different numbers and nobody would take my call to cancel the contract. I was told that, "we will have someone get in contact with you" but nobody called me back to cancel the contract. Several days later, I received a call from someone at Trump University calling to congratulate me. I reiterated that I wanted to cancel the contract and was told that it was too late to cancel and, further, that I owed Trump University an additional \$18,000.00. After being told that I wouldn't be able to cancel the contract and get my money back, I attended the Trump University Seminar on creative finance in Los Angeles from March 5 to March 7, 2010. I did not find the information useful and the person giving the presentation was unable to answer my questions related to my status as a veteran and obtaining VA loans. (Continued on attached page.)

What form of relief are you seeking? (E.g. exchange, repair, money back, product delivery, etc.)  
 Money back.

**READ THE FOLLOWING BEFORE SIGNING BELOW:**  
 In filing this complaint, I understand that the Attorney General is not my private attorney, but rather enforces laws designed to protect the public from misleading or unlawful business practices. I also understand that if I have any questions concerning my legal rights or responsibilities, I should contact a private attorney. I have no objection to the contents of this complaint being forwarded to the business or the person the complaint is directed against, unless box checked below. The above complaint is true and accurate to the best of my knowledge.

Signature:  Date: April 20, 2010

Check here if you only want to notify our office of your concerns and do not want a mediation process initiated.

Please print and send the completed form to the address at the top of this complaint form.  
**Incomplete forms may be returned.**

On March 16, 2010, I was contacted by Paul Reisner of Trump University. Mr. Reisner told me that there was nothing he could do to refund my money and that I should sign a new contract. He faxed over another contract for the Gold Elite program. The contract was identical to the previous contract I had signed except that the amount for the Gold Elite program was \$17,000.00 rather than \$34,995.00. I signed the contract because I had been told that Trump University would not refund my money and that I could not cancel the contract. (Contract attached as Ex. 3. Please note that when I signed the contract, I misdated it 2/16/2010 when I should have written 3/16/2010.) Since I signed the new contract on March 16, 2010, I have not heard from anyone at Trump University.

Given my mental condition at the time, I did not have the judgment or the decision-making ability to sign contract for such a large amount of money. In addition, I feel that I was susceptible to the high-pressure sales tactics that were used by the Trump University employees. Moreover, I tried to cancel the contract almost immediately after signing it but was given the run around by Trump University employees until I was finally contacted and told that it was "too late" to cancel.

Signature

A handwritten signature in black ink, appearing to read "Daniel D. Carr", written over a horizontal line.

Date: April 20, 2010

NOTICE OF CANCELLATION

Date: \_\_\_\_\_

YOU MAY CANCEL THIS TRANSACTION, WITHOUT ANY PENALTY OR OBLIGATION WITHIN THREE BUSINESS DAYS FROM THE ABOVE DATE.

IF YOU CANCEL, ANY PROPERTY TRADED IN, ANY PAYMENTS MADE BY YOU UNDER THE CONTRACT OF SALE, AND ANY NEGOTIABLE INSTRUMENT EXECUTED BY YOU WILL BE RETURNED WITHIN TEN BUSINESS DAYS FOLLOWING RECEIPT BY THE MERCHANT OF YOUR CANCELLATION NOTICE, AND ANY SECURITY INTEREST ARISING OUT OF THE TRANSACTION WILL BE CANCELLED.

IF YOU CANCEL, YOU MUST MAKE AVAILABLE TO THE MERCHANT AT YOUR RESIDENCE, IN SUBSTANTIALLY AS GOOD CONDITION AS WHEN RECEIVED, ANY GOODS DELIVERED TO YOU UNDER THIS CONTRACT OR SALE; OR YOU MAY IF YOU WISH TO COMPLY WITH THE INSTRUCTIONS OF THE MERCHANT REGARDING THE RETURN SHIPMENT OF THE GOODS AT THE MERCHANT'S EXPENSE AND RISK.

IF YOU DO NOT AGREE TO RETURN THE GOODS TO THE MERCHANT, OR IF THE MERCHANT DOES NOT PICK THEM UP WITHIN TWENTY DAYS OF THE DATE OF YOUR NOTICE OF CANCELLATION, YOU MAY RETAIN OR DISPOSE OF THE GOODS WITHOUT ANY FURTHER OBLIGATION.

TO CANCEL THIS TRANSACTION, MAIL OR DELIVER A SIGNED AND DATED COPY OF THIS CANCELLATION NOTICE OR ANY OTHER WRITTEN NOTICE, OR FAX 212-937-3830, OR SEND A TELEGRAM, TO TRUMP U, 40 WALL STREET, NEW YORK, NY 10005 NOT LATER THAN MIDNIGHT OF \_\_\_\_\_.

I HEREBY CANCEL THIS TRANSACTION.

DATE: \_\_\_\_\_

\_\_\_\_\_  
Buyer's Signature  
Print Name: \_\_\_\_\_  
Address: \_\_\_\_\_  
\_\_\_\_\_  
Telephone: \_\_\_\_\_



# **Exhibit L11**



ATTORNEY GENERAL ERIC T. SCHNEIDERMAN  
 OFFICE OF THE ATTORNEY GENERAL  
 BUREAU OF CONSUMER FRAUDS AND PROTECTION  
 120 Broadway, 3rd Floor  
 New York, NY 10271-0332  
 Tel. (212) 416-8345 Fax (212) 416-8787

RECEIVED BY  
 STATE OF NEW YORK  
 CONSUMER FRAUDS & PROTECTION BUREAU  
 11/20/11  
 For Hearing Impaired  
 TDD 1-800-998-9898  
 http://www.eg.ny.gov

DEC 21 2011

PLEASE BE SURE TO COMPLAIN TO THE COMPANY OR INDIVIDUAL BEFORE FILING THIS FORM.  
 PLEASE TYPE OR PRINT CLEARLY IN DARK INK.  
 YOU MUST COMPLETE THE ENTIRE FORM. INCOMPLETE OR UNCLEAR FORMS WILL BE RETURNED TO YOU.  
 MAKE SURE YOU ENCLOSE COPIES OF IMPORTANT PAPERS CONCERNING YOUR TRANSACTION.

**CONSUMER**

NAME EVELYN & BOYCE CHAIT		HOME TELEPHONE NUMBER 903 379-1279	
STREET ADDRESS SHELLEY ROAD		BUSINESS TELEPHONE NUMBER	
CITY/TOWN SPRINGFIELD	COUNTY Union	STATE NY	ZIP 07031

**COMPLAINT**

NAME OF SELLER OR PROVIDER OF SERVICES UNIVERSITY/TRUMP ENTREPRENEUR		NAME OF OTHER SELLER OR PROVIDER OF SERVICES	
STREET ADDRESS WALL STREET 32 <sup>ND</sup> FLOOR INITIATIVE		STREET ADDRESS	
CITY/TOWN NEW YORK	STATE N.Y.	CITY/TOWN	STATE ZIP
ZIP 10005		TELEPHONE NUMBER	
TELEPHONE NUMBER 212-810-7339		TELEPHONE NUMBER	
DATE OF TRANSACTION 07/2010	COST OF PRODUCT OR SERVICE \$34,995.00	HOW PAID (Check those that apply) <input type="checkbox"/> Cash <input checked="" type="checkbox"/> Check <input checked="" type="checkbox"/> Credit Card <input type="checkbox"/> Other	
DID YOU SIGN A CONTRACT? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	WHERE DID YOU SIGN THE CONTRACT? NEW YORK CITY N.Y.	DATE SIGNED 2/07/10	
WAS THE SERVICE ADVERTISED? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	WHERE WAS IT ADVERTISED? N.J. STAR LEDGER	DATE ADVERTISED	

TYPE OF COMPLAINT (e.g. car, mail order, etc. Use the reverse side of this form to provide details)

CONTRACT FOR SERVICE

DATE WHEN COMPLAINED TO THE COMPANY OR INDIVIDUAL	PERSON CONTACTED MARK COVAIS	JOB TITLE OPERATIONS
TYPE OF RESPONSE DENIED REFUND	DATE OF RESPONSE 09/23/11	

HAS THIS MATTER BEEN SUBMITTED TO ANOTHER AGENCY OR ATTORNEY? (If "Yes," give name and address.)  
 Yes  No

IS THERE ANYTHING? (Please describe as necessary)  
 Yes  No

**ADDITIONAL INFORMATION**

MANUFACTURER OF PRODUCT REAL ESTATE SERVICE	PRODUCT MODEL OR SERIAL NUMBER N/A
ADDRESS 40 W. STREET 32 <sup>ND</sup> FLOOR NY, NY	WARRANTY EXPIRATION DATE N/A
DID BUSINESS ARRANGE FINANCING? (If "Yes," give name and address of bank or finance company) <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	

PLEASE DESCRIBE COMPLAINT ON REVERSE SIDE

000201

PLEASE BRIEFLY DESCRIBE YOUR COMPLAINT

I enrolled in a Trump University real estate course which became Trump International because they were not an accredited learning institution. They refused to refund after our written request which is attached to this complaint. Our request for a refund was because they did not follow through on the courses as was stated in their sales pitch seminar. The total amount we paid them was \$35,990. by credit card in full.

WHAT FORM OF RELIEF ARE YOU SEEKING? (e.g., exchange, repair or money back, etc.) MONEY BACK

WHO REFERRED YOU TO THIS OFFICE? SELF

READ THE FOLLOWING BEFORE SIGNING BELOW

PLEASE ATTACH TO THIS FORM PHOTOCOPIES of any papers involved (contracts, warranties, bills received, canceled checks, correspondence, etc.). DO NOT SEND ORIGINALS.

NOTE: In order to resolve your complaint, we may send a copy of this form to the person or firm about whom you are complaining.

In filing this complaint, I understand that the Attorney General is not my private attorney, but represents the public in enforcing laws designed to protect the public from misleading or unlawful business practices. I also understand that if I have any questions concerning my legal rights or responsibilities, I should contact a private attorney. I have no objection to the contents of this complaint being forwarded to the business or person the complaint is directed against. The above complaint is true and accurate to the best of my knowledge.

I also understand that any false statements made in this complaint are punishable as a Class A Misdemeanor under Section 175.38 and/or Section 210.45 of the Penal Law.

Signature: Deelya Chant / Bouye Chant Date: 12/17/11

HAVE YOU ENCLOSED COPIES OF IMPORTANT PAPERS?

Return to: Office of the Attorney General  
Bureau of Consumer Frauds and Protection  
120 Broadway, 3rd Floor  
New York, NY 10271-0332



Event Code \_\_\_\_\_  
Client ID \_\_\_\_\_

### ENROLLMENT FORM

### CONTACT INFORMATION

NAME: \_\_\_\_\_  
ADDRESS: \_\_\_\_\_  
CITY: \_\_\_\_\_ STATE: \_\_\_\_\_ ZIP: \_\_\_\_\_  
E-MAIL: \_\_\_\_\_  
PHONE: \_\_\_\_\_ WORK \_\_\_\_\_ CELL \_\_\_\_\_

### PURCHASE(S)

	Retail Value	Event Special You Save
<b>Trump Gold Elite</b>		
• Wealth Preservation Retreat	\$5,000	<b>29%</b>
• Quick Start Real Estate Retreat	\$5,000	
• Creative Financing Retreat	\$5,000	
• Commercial & Multi-Unit Retreat	\$5,000	
• Real Estate Investor Training Online Program	\$5,000	
• Incorporate Your Business (State Licensing fees not included)	\$995	
• Real Estate Wealth Property Listing Service (One Year Membership)	\$995	
<b>Total</b>	<b>\$34,995</b>	
<b>Trump Silver Elite</b>		
• Wealth Preservation Retreat	\$5,000	<b>19%</b>
• Quick Start Real Estate Retreat	\$5,000	
• Creative Financing Retreat	\$5,000	
• Commercial & Multi-Unit Retreat	\$5,000	
• Real Estate Investor Training Online Program	\$5,000	
• Incorporate Your Business (State Licensing fees not included)	\$995	
<b>Total</b>	<b>\$23,995</b>	<b>\$19,495</b>
<b>Trump Bronze Elite</b>		
• Wealth Preservation Retreat	\$5,000	<b>9%</b>
• Quick Start Real Estate Retreat	\$5,000	
• Incorporate Your Business (State Licensing fees not included)	\$995	
<b>Total</b>	<b>\$10,995</b>	<b>\$9,995</b>

32,995  
34,995  
E  
under 2165  
ADD in  
File  
see Form  
1010C

### PAYMENT

**Credit Card**

CREDIT CARD NO. 4216 8499 6075 3128 NAME EXACTLY AS IT APPEARS ON THE CARD (Please Print) BOYCE HAIT

EXP DATE 04/11 SECURITY CODE 717 BILLING ADDRESS (if Different From Above) \_\_\_\_\_

**Check** ACCOUNT NO \_\_\_\_\_ CITY \_\_\_\_\_ STATE \_\_\_\_\_ ZIP \_\_\_\_\_ CHECK NO 2140

You, the Buyer, may cancel this agreement without any penalty, at any time prior to midnight of the third business day after the date of this transaction. See cancellation notice on reverse side for explanation of this right.

\*Data Subscription Fees: I hereby authorize Trump U to charge my bank account or credit card account, noted above, in the sum of \$34.95 per month for 365 days after the signing of this contract, payable monthly as if I had personally signed a check or sales draft slip to Trump U. This authorization shall remain in effect unless and until I notify Trump U in writing that I wish to cancel this subscription, which I may do at any time whatsoever. A record of my payment will be included in my bank or credit card statement and will serve as my receipt. This subscription can be cancelled at any time. TC Initials

This Program is provided for information only and no guarantees, promises, representations or warranties of any kind regarding specific or general benefits. Monetary or otherwise, have been or will be made by the Program, Program instructors, Trump U, their affiliates or their officers, principals, representatives, agents or employees (collectively, "Principals"). I acknowledge that none of the Principals is engaged in rendering financial, investment, legal, accounting, or other professional services or advice. If such professional advice or other expert services are required, I acknowledge that I should seek the services of a competent professional who can consider my particular circumstances. I acknowledge that none of the Principals is responsible for, and they shall have no liability for, my business success or failure, my acts and omissions, the appropriateness of my business decisions, or my use of or reliance on Program Information. Trump U's obligation to start providing services starts when full payment is received.

By signing below, I ("Participant") acknowledge that I have read and agree to the provisions on the front and back of this Enrollment Form.

SIGNATURE [Signature] DATE \_\_\_\_\_ PARTNER'S SIGNATURE [Signature] DATE 2/7/10

White Copy: TRUMP U Pink Copy: CUSTOMER

SOR: \_\_\_\_\_



Event Code: \_\_\_\_\_

### Terms & Conditions

Trump U Programs are provided for training and educational purposes only.

TU does not procure or identify specific real estate deals. You may be exposed to real estate deals at the Retreats, but it is your sole responsibility to evaluate and act on those properties for your personal investment. We do not recommend or guarantee any investment or property.

You acknowledge and agree that TU has not made any express or implied representation or assurance regarding the potential profitability, chances of funding or likelihood of success of any transaction, investment, opportunity or strategy. Further, you agree that TU is not endorsing your project and you shall not represent same to any third-party. Further, TU is not rendering legal or financial advice.

If you choose to pursue a transaction, it is your sole responsibility to seek independent advice from professionals such as Real Estate Agents and Brokers, Appraisers, Lawyers, Accountants, and Mortgage Brokers.

You must be current on payments to attend Retreats.

Ernie Chart  
Signature

Ernie Chart  
Printed Name

2/7/10  
Date

Ernie Chart  
Guest Signature

Ernie Chart  
Printed Name

2/7/10  
Date

Advisor: \_\_\_\_\_



Course Code: \_\_\_\_\_  
Student ID #: \_\_\_\_\_

CONTACT INFORMATION					
NAME <b>EVELYN CHAIT</b>			GUEST NAME <b>BOYCE CHAIT</b>		
ADDRESS <b>47 SHELLEY ROAD</b>			ADDRESS <b>47 SHELLEY ROAD</b>		
CITY <b>SPRINGFIELD</b>	STATE <b>NJ</b>	ZIP CODE <b>07081</b>	CITY <b>SPRINGFIELD</b>	STATE <b>NJ</b>	ZIP CODE <b>07081</b>
EMAIL <b>EV1279@VERIZON.NET</b>			EMAIL <b>BC1279@VERIZON.NET</b>		
HOME PHONE <b>973-379-1279</b>	WORK PHONE _____		HOME PHONE <b>973-379-1279</b>	WORK PHONE _____	
CELL PHONE <b>908-456-4007</b>	FAX <b>973-379-1281</b>		CELL PHONE <b>908-456-4000</b>	FAX <b>973-379-1281</b>	

ENROLLMENT		
<b>Profit from Real Estate 3-Day Training:</b> (12 Month Audit Privileges)	<b>\$1,495</b>	<del>\$1,495.00</del> <b>995</b>
<b>Guest or Business Partner</b>	<b>Free Bonus</b>	<i>paid in full by me</i>
<b>Premium Membership</b> (12 months)	<b>Free Bonus</b>	
<b>Real Estate Breakthrough 2009</b> (Journal & Audio Course)	<b>Free Bonus</b>	
<b>Foreclosure DealSource</b> (Workshop attendance and credit card required to activate 30 Day Free Trial)	<b>Free Bonus*</b>	

PAYMENT					
<input checked="" type="checkbox"/> <b>Credit Card</b>			NAME EXACTLY AS IT APPEARS ON THE CARD (Please Print)		
CREDIT CARD NO			BILLING ADDRESS (if different from above)		
EXP DATE	SECURITY CODE	CITY	STATE	ZIP	
<input type="checkbox"/> <b>Check</b>			ACCOUNT NO		CHECK NO

You may cancel this agreement without any penalty, at any time prior to midnight of the third business day after the date of this transaction. See cancellation notice on reverse side for explanation of this right. *EC* Initials  
You, the Buyer, may withdraw without penalty from the training class scheduled above by the end of the first day of the next regularly scheduled training class as specified above, or within (14) days from the enrollment date, whichever occurs first. If you attend at a subsequent time, the cancellation option will not apply.

\*Data Subscription Fees: I hereby authorize Trump U to charge my bank account or credit card account, noted below, in the sum of \$34.95 per month, payable monthly as if I had personally signed a check or sales draft slip to Trump U. This authorization shall remain in effect unless and until I notify Trump U in writing that I wish to cancel this subscription, which I may do at any time whatsoever. A record of my payment will be included in my bank or credit card statement and will serve as my receipt. This subscription can be cancelled at the first day of training. *EC* Initials

This training is provided for education only and no guarantees, promises, representations or warranties of any kind regarding specific or general benefits, monetary or otherwise, have been or will be made by the Program, Program instructors, Trump U, their affiliates or their officers, principals, representatives, agents or employees (collectively, "Principals"). I acknowledge that none of the Principals is engaged in rendering financial, investment, legal, accounting, or other professional services or advice. If such professional advice or other expert services are required, I acknowledge that I should seek the services of a competent professional who can consider my particular circumstances. I acknowledge that none of the Principals is responsible for, and they shall have no liability for, my business success or failure, my acts and omissions, the appropriateness of my business decisions, or my use of or reliance on Program information.

By signing below, I ("Participant") acknowledge that I have read and agree to the provisions on the front and back of this Enrollment Form.

SIGNATURE <i>Evelyn Chait</i>	DATE <b>1/27/10</b>	GUEST SIGNATURE <i>Boyce Chait</i>	DATE
White Copy: TRUMP U		Pink Copy: CUSTOMER	

Advisor: \_\_\_\_\_



Event Code: \_\_\_\_\_

### Terms & Conditions

Trump U Programs are provided for training and educational purposes only.

TU does not make or render specific real estate deals. You may be exposed to real estate deals at the Retreats, but it is your sole responsibility to evaluate and act on those properties for your personal investment. We do not recommend or guarantee any investment or strategy.

You acknowledge and agree that TU has not made any express or implied representation or assurance regarding the potential profitability, success or timing or likelihood of success of any transaction, investment, opportunity or strategy. Further, you acknowledge TU is not insuring your project and you shall not represent same to any third-party. Further, TU is not rendering any financial advice.

When entering into a transaction, it is your sole responsibility to seek independent advice from professionals such as Real Estate Agents and Brokers, Appraisers, Lawyers, Accountants, and Mortgage Brokers.

There may be payment on payments to attend Retreats.

Chart  
Printed Name  
Chart  
Printed Name

EVEL  
Printed Name  
EVEL  
Printed Name

1/27/10  
Date  
Date

**EVELYN AND BOYCE CHAIT  
47 SHELLEY ROAD  
SPRINGFIELD, NEW JERSEY 07081**

July 21, 2011

**Mark Covais**

Director of Operations

The Trump Entrepreneur Initiative

40 Wall Street, 32nd Floor

New York, NY 10005

Mr. Covais:

646-810-7339

We enrolled with the Trump University on February 7, 2010 now known as the Trump Entrepreneur Initiative.

We were extremely excited to have been a part of the 'Trump' name. The Mogul of New York real estate and that we are going to learn from the best of the best. We were convinced that with our investment of \$34,995.00 we would see a great return on our money as well as learning how to develop a real estate business for ourselves, the beginning of a great business venture. We had a one-on-one consult that day with one of your representatives where he convinced us that even if we had to max-out our credit cards to pay for the investment it would be well worth every cent.

We started with the telephone mentorship sessions with Stephen Gilpin and we had great expectations as Mr. Gilpin was very motivating which increased our outlook. In late February of 2010 Evelyn became very ill and our son Jeffrey became part of the Chait Team. Boyce and Jeffrey continued with Mr. Gilpin with the telephone sessions that were scheduled once every few weeks. Boyce and Jeffrey continued to attend the live seminars in Manhattan and Great Neck New York and listened to the webinars.



At most all of the Trump mentorship retreats and webinars there was always a very expensive product or service being pitched during the entire afternoon of the last day of the seminars.

Mr. Gilpin was a very likeable person and always made us feel that our investment would result in great benefits for us. However, many times the telephone mentorship sessions would have to be rescheduled because of Mr. Gilpin being out of town on other mentorship business.

The field mentorship was originally scheduled for August 7<sup>th</sup> 2010, Mr. Gilpin had to cancel as he had other business engagements. The next available date was October 7<sup>th</sup>, 2010 but once again, this date needed to be rescheduled for October 21 – 24, 2010 at that date it finally occurred.

Soon after, Mr. Gilpin emailed a spreadsheet for us to complete to document the properties that were viewed together. This was completed and emailed back to Mr. Gilpin. After the field mentorship we wrote three offers that did not materialize. Meanwhile at the same time we were bombarded with emails and telephone calls from your office to complete a survey about the field mentorship. We wanted to wait until we had some results from the overall experience from the mentorship, but that was not what your office wanted and due to your extreme pressure we obliged and completed the survey and sent it back to your office. After that time until the January 2011 communication was poor.

We were contacted by Mr. Gilpin in January 2011 to invite us on a real estate bus tour in the Queens New York area. We attended the tour and that was the last we saw and heard from him. In late February 2011, Jeffrey emailed Mr. Gilpin asking when he could come to New Jersey and view a few properties on which we were interested in writing offers. Mr. Gilpin replied to schedule a telephone session. At the time of the telephone session on March 2, 2011, Jeffrey asked Mr. Gilpin when he could come to New Jersey and view the properties that we were interested in. Mr. Gilpin stated that we should send him pictures of the properties and we can analyze the numbers over the telephone, as he was much too busy to personally view the properties with us. Jeffrey stated we would accommodate Mr. Gilpin's schedule. He mentioned that he was very busy obtaining accreditation from the State of New York.

Since that telephone session we have not heard from Mr. Gilpin and now the Trump Mentorship program ended June 2011.

Mr. Covais, if you were us, would you now feel that you received your \$34,995.00 monies worth? Is this what a V.I.P. status membership should receive?

If we had put that amount on credit cards as we had been encouraged to do at the very beginning, how in the world does one pay it back plus interest? At the age of 76 and 80 we are out our precious savings of \$34,995.00.

This so-called mentorship was a complete failure and extreme disappointment as the Trump program never had the substance, structure and support that one would identify with the 'Trump' name.



We are aware that other students of this mentorship program are also dissatisfied with their experience.

We did not cancel within the first 30 days of enrollment because during that time frame not much took place as to judge the program. We were told more was to come. It is now known to the public that Trump University was not an accredited educational institution with the State of New York.

A demand of the full refund in the amount of \$34,995.00 must be received by August 4<sup>th</sup>, 2011 to the above address or a complaint will be filed with the New York State Attorney Generals Office, New York City Department of Consumer Affairs and legal action will be taken with named; Trump University, Trump Entrepreneur Initiative LLC, Donald J. Trump, Mark Covais, Stephen J. Gilpin and 'et al' in the suite.

Respectably,

Evelyn and Boyce Chait

  
  
3

000209

# Exhibit L12



Better Business Bureau  
Serving Metropolitan New York, Long Island, and the Mid-Hudson Region

30 East 33rd Street  
New York, NY 10016  
(212) 533-6200  
FAX  
[www.newyork.bbb.org](http://www.newyork.bbb.org)

**Case #:** 832925

**Consumer Info:** Clark, Marvin  
809 Admiral Graverly Blvd  
Richmond , VA 23225  
8042535034  
[terri.savage@vadoc.virginia.gov](mailto:terri.savage@vadoc.virginia.gov)

**Business Info:** The Trump Entrepreneur Initiative  
40 Wall Street, 32nd Floor  
New York, NY 10005  
(212) 810-7358

<http://www.trumpinitiative.com>

**Date Filed:** 12/4/2008

**Nature of the Complaint:** Contract Issues

**Consumer's Original Complaint:**

\* UPDATE: In response to the Trump University offer, CONSUMER STATES:

We have looked in to what Trump Unvisersity has offered to Marvin Clark. We had up to a YEAR to get our money back - we would not have paid this kind of money if they had not guaranteed us our money back within a year! They can give a refund of \$1,495.00 back to us. We think that the best interest for all parties involved is for Trump University to simply refund our money back. \*

CONSUMER STATES:

Trump University tells people in the Richmond area that one can get all the information needed to started your business in a three-day training on November 21-23, 2008 from 8:15 to 6PM for \$1,495.00. This company guarantees that you will get everything needed know for started this business in becoming real estate investor and foreclosure real estate. If one is not satisfied with the training, he/she has 1 year to get a refund. The training was nothing as advertised or promoted, which is a breach of the contract. I contacted Trump University and spoke with Jason Schauer who refused to give my refund back.

**Consumer's Desired Resolution:**

000211

**Business/Consumer Response & Rebuttals:**



# Exhibit L13



Better Business Bureau  
Serving Metropolitan New York, Long Island, and the Mid-Hudson Region

30 East 33rd Street  
New York, NY 10016  
(212) 533-6200  
FAX  
www.newyork.bbb.org

**Case #:** 7986655

**Consumer Info:** Crail, Kimberly  
285 Lowell Avenue  
FLORAL PARK, NY 11001  
5162161784  
kcrail@hotmail.com

**Business Info:** Trump University  
40 Wall Street 32nd Floor  
New York, NY 10005  
-

**Date Filed:** 9/17/2009

**Nature of the Complaint:** Refund / Exchange Issues

**Consumer's Original Complaint:**

1.Trump University encouraged me to max out my credit cards to pay for a Gold Elite membership which cost \$35,000 2.They said I would make my money back quickly using their "Quick Turn" Real Estate Investing" techniques, which they would teach me and to make sure I succeeded to get a "mentor", which costs \$25,000. My credit rating plunged from 719 to 633. I have been unable to obtain business credit as a result 3.I have not used several of the services, yet Trump refuses to give me a refund 4.The mentorship was defective & did not provide value for money a. Scheduled too soon.An entire day wasted on phone-why not prior? b.Trump employee "observed" my mentorship, distracting from my training c.Mentor did not teach Quick-Turn techniques I needed, but focused on REO's, which require \$ d.Trump offered a 2-day "do-over" e.I was told by some Trump employees that their techniques do not work in NY f. Instead of a payment in kind, I have requested a 2/3 cash refund of the \$25,000 5. Trump's first mentor told my business partner "you aren't going to be able to do this, are you?" Got new mentor, who came unprepared, with a program not suited to my needs. 6. Mentor encouraged me to submit fraudulent hard money approval letter 7. Mentor's property repair estimates less than half the actual estimates for repairs 8.Commercial Investing retreat was defective. Instructor knew nothing. Out of 3 days, less than 5 hours of actual instruction time. Balance spent starting very late, taking long breaks, and pitching either the instructor's personal wealth training, or the CD of the event, along with some "additional information" that would be shipped to us later at a cost of \$495! Yet they forbade us to record it ourselves. The course cost \$5,000 (\$3850 discounted) 9. In summary, this company is a fraud. I want my money back. Total \$38,671.10 charged to 3 credit cards on 11/14/08

**Consumer's Desired Resolution:**

I would like a full refund of the money paid to Trump University. I have contacted the company on numerous occasions to settle this reasonably, but they are unwilling to negotiate. The products and services were either not used, or defective beyond repair. They and their affiliates have committed fraud and encourage others to commit fraud in the normal course of business. It is clearly not a university but a money-making scheme.

000214

## **Business/Consumer Response & Rebuttals:**

**12/07/2009**

**Brad Schneider**

Respond to Complaint

Business Response

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**12/07/2009**

**Ms. Kimberly Crail**

The business's response does not resolve my complaint.

Better Business Bureau:

I have reviewed the response made by the business in reference to complaint ID 7986655, and have determined that this does not resolve my complaint.

To assist the BBB in bringing this matter to a close, please explain why this does not resolve your complaint: Trump University's letter is dated 11/23/09, yet I just received this on 12/7/09.

As a former Chief Financial Officer and Certified Public Accountant I am well-versed in business practices. Trump University provides what appears to be good information when you are in the class, but then you go out in the real world and find out IT DOES NOT WORK. In fact, I would go to jail in the state of NY using Trump's "Quick Turn" Techniques. Trump University did not address any of my complaints in their response. In fact, they make no mention of their very low success rate with mentorships. Let's get the facts. The product they are selling is defective and fraudulently described.

My note to Troy Petersen, which is quoted by Trump, followed a very emotional scene on the last day, in which (in tears) I am complaining bitterly about the lack of preparedness, and the lack of substance for the 3-day \$25,000 experience. Troy Petersen is a Christian minister, and my note to him was on a more personal note, and, frankly, as a woman, I felt bad that I had cried before his departure. Moreover, the fact that Trump University offered me a "repeat" of the mentorship speaks volumes.

I would like to hear from Jason Schauer about my "satisfaction" with the program. He was there. At my expense. Trump sent an employee out on my dime, and it ruined any semblance of a useful experience.

I will be filing a complaint with the NY State Attorney General, as it is clear that Trump "University" is as fraudulent and fake as Donald Trump's "hair". I have spoken to numerous other dissatisfied Trump students, and so I am not alone in my views on Trump "University".

I require a full refund, as well as reimbursement for my costs to undo the damage done to my credit rating by Trump "University". That cost me \$3,150.

000215



Please contact me by telephone to discuss further.

Sincerely,

Kimberly Crail

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**01/31/2010**  
**Brad Schneider**

Response to Complaint  
Business Response to Rejection

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**02/21/2010**  
**Ms. Kimberly Crail**

The business's response does not resolve my complaint.

Better Business Bureau:

I have reviewed the response made by the business in reference to complaint ID 7986655, and have determined that this does not resolve my complaint.

To assist the BBB in bringing this matter to a close, please explain why this does not resolve your complaint:

Trump

sold me mentoring services - specifically "quick turn" real estate techniques - for use in NY where the classes were taught. That is what I paid for. I paid \$38,000 for a package of services designed to allow me to make money without my own money or credit (Trump was aware that I had neither). Their sales rep, Steven Goff, "corralled" me with his story of living in his car and making this work at a "free seminar", which then fed the paid event where they get you to sign up for the really big ELITE package! So, I used my last dime of credit and paid up. Unfortunately, the products I had received were workable and are of questionable legality in my state! And so, the \$25,000 mentorship I received from Trump was focused on buying REO properties, which require money or credit. (AGAIN - they were all aware that I had neither money nor credit available). Trump COULD NOT provide mentorship on their Quick Turn techniques in NY state after all! At least not the ones that don't require money or credit!!!! So, I was fraudulently led to believe that these techniques and products would work for me in my home state, where these classes

000216

were taught. Trump's representative, my Mentor, went so far as to encourage me to commit fraud with another Trump student, in order to allow me to make offers on these REO properties we saw on day 2 of the mentorship, which I was NOT qualified to purchase. He encouraged another Trump student to provide me with a fraudulent proof of funds letter! (We spent all of Day 1 of the Mentorship trying to find a hard money lender to loan me money or get me an approval letter. We were unsuccessful, thus Trump encouraged the fraudulent proof of funds letter.) In fact, one Trump employee actually told me that Trump's Lease Options, the key "Quick Turn" technique that Mr. Goff used and which sold me on the program, does not work in NY. (Which explains why we were unable to do one with our prior mentor, Mr. Steve Gilpin, who is a NY resident, and who told my former business partner who he was also mentoring at the time "you aren't going to be able to do this, are you?" That was not helpful. At which point we switched mentors, which is why there were more mentoring sessions on record for this account! I later learned that Mr. Gilpin's wife was dying of cancer during that time. I was sorry for his loss. Yet, he was really not focused on our mentorship, also contributing to the larger number of sessions on record. Quantity does not mean quality. Then they rushed to get me to complete the 3-day mentorship with Troy Peterson, probably so I wouldn't ask for a refund then!!!) That way they can say I've "used" all the of products and should be denied a refund.

The products I paid for were not the products I received. Pure and simple. Trump is fraudulently teaching classes to NY residents and selling them services that they KNOW will not work and/or will violate NY state law.

They aide and abet fraud when they can no longer cover the original fraud of the products themselves. Yes, they offered me a refund for products and services I have never received. Of course! Why would I pay for something I don't have? Yet they want me to sign a release just for that? And, what about the defective and fraudulent mentorship they sold me at a price of \$25,000 on top of the \$9,000 refund they are offering me! And that doesn't include the \$5,000 cost of the bogus commercial "retreat" with Omar Periu, whose only qualification I could see was his existing wealth and salesmanship abilities. Barely 2 hours of educational content at this 3-day retreat. And, no refreshments other than ice water and the hotel hard candy. \$5,000? Please! This is outrageous!

My next step is to engage with the New York State Attorney General's office, on the advice of my attorney. They will have the resources to do this matter the justice it deserves. And, I am also going to ask that they look into the relationship between Trump and the BBB, given

the recent and very favorable changes to the BBB records on the Trump University scorecard/rating. I hope that Mr. Cuomo will be able to get to the bottom of this behavior.

I would be satisfied with a complete refund from Trump University and am willing to sign a release of liability and agree to refrain from any future legal action, including involving the attorney general's office. This matter needs to be resolved without further delay. Please feel free to contact me by telephone at 516.426.9459.

I will be mailing my letter via Certified Mail to Mr. Cuomo's office on March 8, 2010 if this matter has not been resolved by that date.

Sincerely,

Kimberly Crail

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**03/19/2010**  
**Brad Schneider**

Respond to Complaint  
see attached

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# Exhibit L14

Friday, July 15, 2011

Mr. Eric H. Holder, Jr. Attorney General

U.S. Department of Justice

950 Pennsylvania Avenue, N.W

Washington, DC 20530-0001

Dear Mr. Holder

We are writing to you to complain about a Donald Trump investment opportunity that we were lured into and ended up losing more than \$30,000.

About two years ago, Donald Trump appeared on a local TV station inviting people to come to a seminar in which he would teach them the Trump way of making a profit in real estate. His pitch was that he had made money and could show you how while others giving seminars were only selling paper.

On June 9, 2008 we went to our first seminar. We paid \$1,501.45 to be taught the Trump Way. Those of us who joined up were then invited to a 3 Day Wealth Building Weekend. There we were introduced to the real estate Tax Lien investing in which we paid \$9,997.00. From this seminar, those of us who invested were invited to go to Houston, Texas where we would be walked step by step through the process.

In Houston, developers presented us with what they called a win-win opportunity to help rebuild houses in the Biloxi, Mississippi area. They said we would be helping to get people out of trailers into homes. They said no FICA score was needed because we only had to put up 10% of the cost of the unit and a grant from the Mississippi Housing authority that we would not have to repay/would cover the balance.

For a duplex costing \$239,800, I made a deposit in Houston of \$10,000. We were told that we could go down to Mississippi and see the area where the houses would be built and pick out the lot we want to build on. During our visit to Mississippi, I gave the balance of my 10% a check for \$13,980.90. During that visit, a representative included in the contract a statement "Contract is contingent upon securing 90% LTV"

We have called them and written them numerous times for a refund. The numbers that were given to us from Donald Trumps initial contacts no longer work.

After two years, on August 9, 2010 we received a letters declaring us to be in default.

They refused to return our money. There were about 60 people from across the United States who came to Houston and fell prey to this Donald Trump scam.

We don't have money to give away like this. We acted on good faith trusting who we thought was a well know business man of integrity.

Can you advise us of any remedy that may be available to us? And if at all possible, stop Trump from going on the air and deceiving the American people to rob them out of their meager savings.

We have documentation of everything stated in this letter and can be reached at the following numbers:

TRUMP 00117815

000220

US Attorney General

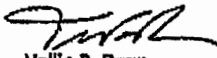
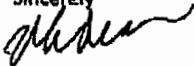
July 15, 2011

Page 2

1. Vallie B. Dean 301-249-4667 and 301-249-1498 home and cell and email [deava6044@gmail.com](mailto:deava6044@gmail.com)

2. Raymond Tighomes 240-432-1758 and email [tighomes@gmail.com](mailto:tighomes@gmail.com)

Sincerely



Vallie B. Dean

Raymond Tighomes

- C
- 1 Donald Trump Institute
  - 2 CBT Group LLC
  3. Attorney General Biloxi, MS
  4. Go Zone Real Estate Club

TRUMP 00117816

000221

# Exhibit L15

<b>Record # 17 / Consumer Sentinel Network Complaints</b>			
<b>Reference Number:</b>	13800821	<b>Originator Reference Number:</b>	
<b>Language:</b>	English	<b>Contact Type:</b>	Complaint
<b>Source:</b>	Consumer	<b>DNC?</b>	N
<b>Comments:</b>	(Product Name: Real Estate Education) Lot of sweet promises were made that this training will enable me to conduct real estate deals especially in foreclosure market; and further training sessions were sold. Asked for results; the reply was that the investment is towards education like any other educational institution!		
<b>Was the complaint resolved?:</b>		<b>Complaint Resolution:</b>	
<b>Data Reference:</b>			
<b>Entered By:</b>	ASMITLEY	<b>Entry Date:</b>	5/13/2008
<b>Updated By:</b>		<b>Updated Date:</b>	
<b>Complaint Source:</b>	FTC Online Complaint Assistant (CIS)	<b>Product Service Code:</b>	Education: Trade/Vocational Schools
<b>Amount Requested:</b>	\$4,995.00	<b>Amount Paid:</b>	\$4,995.00
<b>Payment Method:</b>	Other Credit Card	<b>Agency Contact:</b>	Internet
<b>Complaint Date:</b>	5/9/2008	<b>Transaction Date:</b>	8/12/2007
<b>Initial Contact:</b>	Mail	<b>Initial Response:</b>	
<b>Statute/Rule:</b>	FTC Act Sec 5 (BCP)	<b>Law Violation:</b>	Deception/Misrepresentation
<b>Topic:</b>		<b>Dispute with Credit Bureau?:</b>	N
<b>Dispute with Credit Bureau - Responded?:</b>		<b>Dispute with Credit Bureau - Resolved to Satisfaction?:</b>	
<b>Member of armed forces or dependent?:</b>			
<b>Consumer Information</b>			
<b>Consumer</b>			
<b>Complaining Company/Org:</b>			
<b>First Name:</b>	Mohammad	<b>Last Name:</b>	Ejaz
<b>Address 1:</b>	P.O.Box 6294	<b>Address 2:</b>	
<b>City:</b>	Anaheim	<b>State:</b>	California
<b>Zip:</b>	92816	<b>Country:</b>	UNITED STATES
<b>Home Number:</b>	714-4903910	<b>Work Number:</b>	
<b>Fax Number:</b>		<b>Ext:</b>	
<b>Email:</b>	ejaz0212@hotmail.com	<b>Age Range:</b>	50 - 59
<b>Military Service Branch:</b>		<b>Soldier Status:</b>	
<b>Soldier Station:</b>			
<b>Subject</b>			
<b>Subject:</b>	Trump University		
<b>Address:</b>	40 Wall Street 32nd Floor		
<b>City:</b>	New York	<b>State/Prov:</b>	New York
<b>ZIP:</b>	10005	<b>Country:</b>	United States
<b>Email:</b>		<b>URL:</b>	
<b>Area Code:</b>	212	<b>Phone Number:</b>	2481800
<b>Ext:</b>		<b>Subject ID Type:</b>	
<b>Subject ID Issuer State:</b>		<b>Subject ID Issuer Country:</b>	



**Representative  
Name:**

**Title:**

# Exhibit L16



Better Business Bureau  
Serving Metropolitan New York, Long Island, and the Mid-Hudson Region

30 East 33rd Street  
New York, NY 10016  
(212) 533-6200  
FAX  
www.newyork.bbb.org

**Case #:** 8284277

**Consumer Info:** Gaudey, Carol  
45-520 Puoni Place  
KANEEOHE, HI 96744  
8082473049  
caroleyan2002@yahoo.com

**Business Info:** The Trump Entrepreneur Initiative  
40 Wall Street 32nd Floor  
New York, NY 10005  
8888265953

**Date Filed:** 9/4/2010

**Nature of the Complaint:** Refund / Exchange Issues

**Consumer's Original Complaint:**

On July 18, 2010, after attending a 3 day workshop, my husband and I signed a contract for a 1 year apprenticeship program. The cost was \$24,995. We had to max out 3 credit cards to come up with the money. At the workshop the Trump organization was continuously praised by our future mentor. The program was to include 1 on 1 instruction with the mentor, a 3 day on site 1 on 1 with the mentor and a one year free access to a computer software, e-business.

During the first month we spoke to our mentor on the phone once and had several email conversations. Part of the emails were in regards to the unavailability of the software program. My husband and I were very enthused and followed all of the mentor's suggestions. We picked up extra shifts at our jobs to help pay off our credit cards. We made many calls and sent out letters looking for motivated sellers. We still don't have access to the software.

On August 18, 2010, we received an email from our mentor notifying us that he had resigned from the company because he can't continue to work for free nor compromise his integrity. We felt like we had hit a brick wall. We were totally traumatized by this lack of respect for the "Greatest Company" and the loss of our mentor.

I immediately sent an email to the company stating we were very unhappy and requested a refund. I received a call back the same day and was told they didn't even know the mentor had resigned. We were shocked! This sudden change of circumstances was debilitating.

On August 21, 2010 we received an email from our mentor telling us everything was back on track. In a telephone call he told us that there were "boneheads" in the company that blocked communication. This further eroded our confidence in the company as well as our mentor.

A later phone call with the manager of new student services confirmed our suspicions that we had been used as a leverage in a contract negotiation. We have requested a full refund.

**Consumer's Desired Resolution:**

We desire a full refund and a rescission of the contract. We feel that our loss of confidence in the company and it's program is a direct cause of both the mentor and the company he represents. We lost our momentum and that is a loss of value for us. The company has benefited \$24,995 and we have no benefit.

000226

**Business/Consumer Response & Rebuttals:**

**11/18/2010**

**April B. Neumann**

Respond to Complaint

Attached is The Trump Entrepreneur Initiative's response to your complaint.

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**11/18/2010**

**Mrs. Carol Gaudey**

I accept the business's response to this complaint.

Better Business Bureau:

I have reviewed the response made by the business in reference to complaint ID 8284277, and find that this resolution is satisfactory to me and the matter has been resolved.

Sincerely,

Carol Gaudey

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# Exhibit L17



ATTORNEY GENERAL ERIC T. SCHNEIDERMAN  
 OFFICE OF THE ATTORNEY GENERAL  
 BUREAU OF CONSUMER FRAUDS AND PROTECTION  
 120 Broadway, 3rd Floor  
 New York, NY 10271-0332  
 Tel. (212) 416-8345 Fax (212) 416-8787

STATE OF NEW YORK  
 Consumer Hotline For Hearing Impaired  
 1 (800) 771-7755 TDD (800) 788-9898  
<http://www.ag.ny.gov>

895726

1. PLEASE BE SURE TO COMPLAIN TO THE COMPANY OR INDIVIDUAL BEFORE FILING.
2. PLEASE TYPE OR PRINT CLEARLY IN DARK INK.
3. YOU MUST COMPLETE THE ENTIRE FORM. INCOMPLETE OR UNCLEAR FORMS WILL BE RETURNED TO YOU.
4. MAKE SURE YOU ENCLOSE COPIES OF IMPORTANT PAPERS CONCERNING YOUR TRANSACTION.

<b>CONSUMER</b>		
YOUR NAME Robert Guillo and Alexander R. Guillo		HOME TELEPHONE NUMBER (516) 627-3394
STREET ADDRESS 94 Shoreview Road		<del>BUSINESS</del> TELEPHONE NUMBER (516) 627-3394
CITY/TOWN Manhasset	COUNTY Nassau	STATE New York
		ZIP 11030-1838
<b>COMPLAINT</b>		
NAME OF SELLER OR PROVIDER OF SERVICES Trump Entrepreneur Initiative formerly: Trump University LLC		NAME OF OTHER SELLER OR PROVIDER OF SERVICES The Trump Organization
STREET ADDRESS 40 Wall Street - 32nd Floor		STREET ADDRESS 725 Fifth Avenue
CITY/TOWN New York	STATE New York	ZIP 10005-1304
		CITY/TOWN New York
		STATE New York
		ZIP 10022-2519
TELEPHONE NUMBER (646) 810-7339 for Mark Covais Director of Operations		TELEPHONE NUMBER (212) 836-3204 for George A. Sorial, Assistant General Counsel
DATE OF TRANSACTION 09/16/2009 and 09/27/2009	COST OF PRODUCT OR SERVICE \$ 36,495.00	HOW PAID (Check those which apply) <input checked="" type="checkbox"/> Cash <input type="checkbox"/> Check <input checked="" type="checkbox"/> Credit Card <input type="checkbox"/> Other
DID YOU SIGN A CONTRACT? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	WHERE DID YOU SIGN THE CONTRACT? New York City	DATE SIGNED 09/16/2009 and 09/27/2009
WAS PRODUCT OR SERVICE ADVERTISED? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	WHERE WAS IT ADVERTISED? New York City Penny Saver and Trump University Web Page	DATE ADVERTISED September 2009
TYPE OF COMPLAINT (e.g. car, mail order, etc. Use the reverse side of this form to provide details) Consumer Fraud		
DATE YOU COMPLAINED TO THE COMPANY OR INDIVIDUAL 08/10/2011 <input checked="" type="checkbox"/> By Mail <input type="checkbox"/> By Telephone <input type="checkbox"/> In Person	PERSON CONTACTED George A. Sorial	JOB TITLE Assistant General Counsel
NATURE OF RESPONSE In a phone call on 09/20/2011 George A. Sorial refused to send a refund		DATE OF RESPONSE 09/20/2011
HAS MATTER BEEN SUBMITTED TO ANOTHER AGENCY OR ATTORNEY? (If "Yes," give name and address) <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
IS COURT ACTION PENDING? (Please describe as necessary) <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
<b>ADDITIONAL INFORMATION</b>		
MANUFACTURER OF PRODUCT		PRODUCT MODEL OR SERIAL NUMBER
ADDRESS		WARRANTY EXPIRATION DATE
DID BUSINESS ARRANGE FINANCING? (If "Yes," give name and address of bank or finance company) <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		

PLEASE DESCRIBE COMPLAINT ON REVERSE SIDE

**BRIEFLY DESCRIBE YOUR COMPLAINT**

Alexander R. Guillo signed a Trump University Enrollment Form and paid \$1,500.00 in cash on September 16, 2009 to attend a Profit from Real Estate Training course at Trump University that was given by Jim Harris on September 25, 26 and 27. This course was attended by Robert Guillo, who signed a Trump University Enrollment Form on September 27, 2009 for a Trump Gold Elite course in the amount of \$34,995.00 which was paid in full on Robert Guillo's American Express Credit Card. Prior to paying the tuition of \$34,995.00, Robert Guillo obtained a copy of Section 204 (i) of the New York Limited Liability Law which indicates that the name of a Limited Liability Company shall not contain the term "University" or any other term restricted by Section 224 of the Education Law without the consent of The Department of Education. Robert Guillo also went to the web site of the Department of State of New York which indicated that the Articles of Organization of Trump University LLC were filed in New York on October 25, 2004.

Alexander R. Guillo and Robert Guillo were led to believe that they were enrolling as "students" in a "University" that had been approved by the Board of Regents and the Department of Education of New York. Since Trump University LLC was not a "University" and the retreats we attended were designed to solicit thousands of dollars from all of the attendees for additional programs. We have requested a refund of \$35,995.00 Attached to this form are copies of Robert Guillo's letters to George A. Sorial of August 10, 2011 (with the attachments that were sent with the letter) and September 12, 2011. On September 20, 2011 Robert Guillo received a phone call from George A. Sorial who refused to refund any payments and only offered to have one of his best associates complete the 3 day in-field mentorship .

WHAT FORM OF RELIEF ARE YOU SEEKING? (e.g., exchange, repair or money back, etc.) Money Back

WHO REFERRED YOU TO THIS OFFICE? Web site of Attorney General of New York

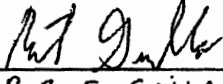
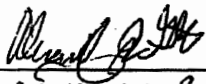
**READ THE FOLLOWING BEFORE SIGNING BELOW**

PLEASE ATTACH TO THIS FORM PHOTOCOPIES of any papers involved (contracts, warranties, bills received, canceled checks, correspondence, etc.). **DO NOT SEND ORIGINALS.**

**NOTE:** In order to resolve your complaint, we may send a copy of this form to the person or firm about whom you are complaining.

In filing this complaint, <sup>we</sup> understand that the Attorney General is not <sup>our</sup> private attorney, but represents the public in enforcing laws designed to protect the public from misleading or unlawful business practices. <sup>we</sup> also understand that if <sup>we</sup> have any questions concerning <sup>our</sup> legal rights or responsibilities, <sup>we</sup> should contact a private attorney. <sup>we</sup> have no objection to the contents of this complaint being forwarded to the business or person the complaint is directed against. The above complaint is true and accurate to the best of <sup>our</sup> knowledge.

<sup>we</sup> also understand that any false statements made in this complaint are punishable as a Class A Misdemeanor under Section 175.30 and/or Section 210.45 of the Penal Law.

Signature:   Date: September 26, 2011  
ROBERT GUILLO ALEXANDER R. GUILLO

**HAVE YOU ENCLOSED COPIES OF IMPORTANT PAPERS?**

Return to: **Office of the Attorney General  
Bureau of Consumer Frauds and Protection  
120 Broadway, 3rd Floor  
New York, NY 10271-0332**

Robert Guillo  
94 Shoreview Road  
Manhasset NY 11030-1838

Phone: (516) 627-3394  
Email: [bobg94@optonline.net](mailto:bobg94@optonline.net)

August 10, 2011

George A. Sorial, Esq.  
Managing Director International Development  
and Assistant General Counsel  
The Trump Organization  
725 Fifth Avenue  
New York NY 10022-2519

RE: The Trump Entrepreneur Initiative LLC  
formerly: Trump University LLC  
Demand for refund of \$35,995.00

Dear Mr. Sorial:

Attached are the following copies:

1. Letter dated March 30, 2010 from State Education Assistant Commissioner Joseph Frey to Donald Trump, Chairman of Trump University.
2. Letter dated April 27, 2010 from George A. Sorial to Joseph Frey.
3. Letter dated May 5, 2010 from State Education Department Associate Attorney, Richard L. Nabozny.
4. Certificate of Amendment of the Articles of Organization of Trump University LLC, signed by Donald J. Trump on May 20, 2010, that was filed with the Department of State of New York on May 21, 2010, which changed to name of the LLC  
To: The Trump Entrepreneur Initiative LLC
5. Trump University Enrollment Form for Profit from Real Estate 3-Day Training dated September 16, 2009 indicating receipt of a cash payment of \$1,500.00 From Alexander R. Guillo.

000231



6. Trump University Enrollment Form dated September 27, 2009 for the purchase of Trump Gold Elite for Alex Guillo and Robert Guillo in the amount of \$34,995.00 that was paid in full by Robert Guillo on his American Express Credit Card.
7. Email dated September 29, 2009 from Jason Schauer of Trump University confirming a refund of \$500.00 that was subsequently credited to the American Express Credit Card of Robert Guillo.
8. Email dated August 31, 2010 from Diego Guevara of The Trump Entrepreneur Initiative confirming that Alex Guillo and Bob Guillo never went to a 3 day coaching session with a Trump Mentor.
9. Trump Goal Setting Sheet requesting Student Information that was required to be completed by Bob Guillo on September 25, 2009, which was the first day of the Profit From Real Estate Investing presentation by Jim Harris and Trump University Associates
10. A photograph of Bob Guillo that shows him with a life size figure of Donald Trump that was taken by a Trump University Associate on September 25, 2009 and attached to the Trump Goal Setting Sheet.
11. Four pages of the "Wealth Counsel Complete" package priced at \$9,995.00 that was given to Robert Guillo during a one-on-one interview at the J.J. Childers Wealth Preservation Retreat

In addition to the reputation of Donald Trump as a successful billionaire real estate investor, the primary reason that Alexander R. Guillo and Robert Guillo paid \$35, 995.00 was the fact that Trump University LLC was organized in New York State and we assumed that we were enrolling in a "University" that was approved by the New York State Department of Education and the New York State Board of Regents. We did not realize that Trump University LLC was not a "University" until it filed a Certificate of Amendment of the Articles of Organization on May 21, 2010.

The "Profit From Real Estate Investing" retreat that was given by Jim Harris on September 25, 26 and 27, 2009 emphasized that Donald Trump established a "University" for students that wanted to learn the techniques that Mr. Trump used to become a billionaire real estate investor. Jim Harris stated that any attendee that enrolled on the Trump Gold Elite program would become a member of a select "in-the-know" group that would be given the opportunity to invest in real estate deals that were not available to other investors. Jim Harris was an excellent motivational speaker who told his "rags to riches" story which was designed to get the attendees to increase their credit card limits in order to purchase the Trump Gold Elite program.

The "Quick Start Real Estate Retreat" that was given on October 2, 3 and 4, 2009 was given to solicit \$995.00 for a "Quick Start Study Group"

The "Wealth Preservation" retreat that was given on October 23, 24 and 25, 2009 by J.J. Childers who was referred to as "Mr. Trump's Attorney" was given to solicit \$9,995.00 for a Wealth Preservation Program.

The "Creative Financing" retreat that was given on January 15, 16 and 17, 2010 by Billy Cannon and Eric Brown was given to solicit \$4,495.00 for their "Jump Start Coaching" program.

The "Multi Family" retreat that was given on February 12, 13 & 14, 2010 by Billy Cannon and Eric Brown was given to solicit a 3 day one-on-one membership for \$19,995.00.

At the conclusion of each retreat the presenters asked the attendees to complete a satisfaction questionnaire in order to get a Certificate of Completion for the "Course". They also pleaded for a favorable rating so that "Mr. Trump would invite them back to do other retreats:.

I was informed by the presenters that each retreat would be recorded and that the attendees were not allowed to make any type of audio or video recordings. If they were in fact recorded, you should be able to confirm all of the information that I have provided in this letter.

We never took the 3 day in field mentorship and we did not have J.J. Childers compile and file a Limited Liability Company in any jurisdiction.

I have reviewed several complaints that were filed with the Office of the Attorney General of New York and class actions that were filed in the Federal Courts in other states and have discovered that the experiences of those individuals are similar to mine.

Please have a certified or bank check made payable to Alexander R. Guillo in the amount of \$1,500.00 and a certified check made payable to Robert Guillo in the amount of \$34,495.00 sent to us at: 94 Shoreview Road, Manhasset NY 11030-1838.

If I do not hear from you on or before August 31, 2011, I will file a consumer complaint with the Attorney General of New York and take whatever other legal action that is available to me.

Very truly yours,

*Robert Guillo*  
Robert Guillo  
*Alexander R. Guillo*  
Alexander R. Guillo

U.S. Postal Service  
**CERTIFIED MAIL RECEIPT**  
*(Domestic Mail Only; No Insurance Coverage Provided)*

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**OFFICIAL USE**

Postage	\$ 1.89	0037
Certified Fee	\$2.85	55 Postmark here
Return Receipt Fee (Endorsement Required)	\$2.30	
Restricted Delivery Fee (Endorsement Required)	\$0.00	
<b>Total Postage &amp; Fees</b>	<b>\$ 7.03</b>	06/10/2011

Sent To: *George A. Soriar, Esq.*  
Street, Apt. No.: *The Trump Organization*  
of PO Box No.: *725 FIFTH AVENUE*  
City, State, ZIP+4: *New York NY 10022-2519*

SENDER - COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<ul style="list-style-type: none"> <li>Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.</li> <li>Print your name and address on the reverse so that we can return the card to you.</li> <li>Attach this card to the back of the mailpiece, or on the front if space permits.</li> </ul> <p>1. Article Addressed to: <i>GEORGE A. SORIAL, ESQ</i> <i>THE TRUMP ORGANIZATION</i> <i>725 FIFTH AVE</i> <i>NEW YORK NY 10022-2519</i></p>	<p>A. Signature: <i>[Signature]</i> <input type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p>B. Received by (Printed Name): <i>[Signature]</i> <input type="checkbox"/> Certified Mail <input type="checkbox"/> Restricted Delivery</p> <p>D. Is delivery address different from item 1? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If YES, enter delivery address below:</p> <p>3. Service Type  <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail  <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise  <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p> <p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>

**Office of the Attorney General**  
**Bureau of Consumer Frauds and Protection**  
120 Broadway 3<sup>rd</sup> Floor  
New York NY 10271-0332

September 26, 2011

The following was attached to the Complaint Form sent by Priority Mail:

1. Four page letter dated August 10, 2011 to George A. Sorial with attachments to that letter and copies of the American Express invoices showing charge of \$34,995.00 and credit of \$500.00
2. Two page letter dated September 12, 2011 to George A. Sorial.
3. FAX of September 20, 2011 to George A. Sorial
4. Section 204 of the NY Limited Liability Company Law.
5. Certificate of Accomplishment for Alex Guillo.
6. Certificate of Accomplishment for Robert Guillo.
7. Letter dated June 29, 2011 from Jerome McAvoy with enclosures..
8. Letters of December 2, 2010 and November 18, 2010 from Amy C. Karp, Records Access Officer and Assistant Counsel of the Office of the Attorney General
9. Form Letter Dated September 17, 2009 to Alex(salutation Dear "Joe" from James Harris with copy of the envelope addressed to Alex Guillo on reverse side.

000235

Robert Guillo  
94 Shoreview Road  
Manhasset NY 11030-1838

Phone: (516) 627-3394  
Email: [bobg94@optonline.net](mailto:bobg94@optonline.net)

September 12, 2011

George A. Sorial, Esq.  
Managing Director International Development  
and Assistant General Counsel  
The Trump Organization  
725 Fifth Avenue  
New York NY 10022-2519

RE: The Trump Entrepreneur Initiative LLC  
formerly: Trump University LLC  
Demand for refund of \$35,995.00

Dear Mr. Sorial:

Please refer to my letter of August 10, 2011 that was received in your office on August 11, 2011. I received phone calls from Mark Covais, the Director of Operations, of The Trump Entrepreneur Initiative LLC on August 11, 2011 and on August 18, 2011. Mark Covais told me that he received my letter from your office and that he had reviewed the recorded audio/video tapes of the "Retreats" that we attended. Mark Covais told me that he would send you a report within 30 days.

In my letter of August 10, 2011, I requested a certified or bank check made payable to Alexander R. Guillo in the amount of \$1,500.00 and a certified check or bank check made payable to Robert Guillo in the amount of \$34,495.00 be sent to us at:  
94 Shoreview Road, Manhasset NY 11030-1838. I have not received the checks.

The copies of the letters from the Department of Education to Donald Trump and your letters to the Department of Education, which resulted in the filing of an Amendment with the Department of State of New York changing the name of Trump University LLC to The Trump Entrepreneur Initiative LLC on May 21, 2010 clearly indicate that the LLC was never a "University".

Since we were deceived into believing that we were enrolling as "students" in a "University" licensed in New York State, the payments that we made on September 16, 2009 and September 27, 2009 should be refunded immediately.

If I do not receive the checks on or before September 19, 2011, I will file a Consumer Complaint with the Attorney General of New York and take whatever other legal action that is available to me.

000236

I am sending a copy of this letter by Certified Mail to:

Mark Covais  
Director of Operations  
The Trump Entrepreneur Initiative LLC  
40 Wall Street 32<sup>nd</sup> Floor  
New York NY 10005-1304

Very truly yours,

Robert Guillo

Original by Certified Mail

Copy by Certified Mail to: Mark Covais

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<ul style="list-style-type: none"> <li>Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.</li> <li>Print your name and address on the reverse so that we can return the card to you.</li> <li>Attach this card to the back of the mailpiece, or on the front if space permits.</li> </ul>	<p>A. Signature  <input checked="" type="checkbox"/> Agent  <input type="checkbox"/> Addressee</p> <p>B. Received by (Printed Name)  <i>K. Co...</i></p> <p>C. Date of Delivery  <i>9/15/11</i></p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes          If YES, enter delivery address below: <input type="checkbox"/> No</p>
<p>1. Article Addressed to:  <b>GEORGE A. SORIAL, ESQ</b>  <b>MANAGING DIRECTOR</b>  <b>INTERNATIONAL DEVELOPMENT</b>  <b>AND ASSISTANT GENERAL COUNSEL</b>  <b>THE TRUMP ORGANIZATION</b>  <b>725 FIFTH AVENUE</b>  <b>NEW YORK NY 10022-2519</b></p>	<p>3. Service Type  <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail  <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise  <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p> <p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>
<p>2. Article Number          (Transfer from service label) <b>7011 0470 0001 8794 2988</b></p>	
<p>PS Form 3811, February 2004 Domestic Return Receipt 102595-02-M-1540</p>	

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<ul style="list-style-type: none"> <li>Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.</li> <li>Print your name and address on the reverse so that we can return the card to you.</li> <li>Attach this card to the back of the mailpiece, or on the front if space permits.</li> </ul>	<p>A. Signature  <input checked="" type="checkbox"/> Agent  <input type="checkbox"/> Addressee</p> <p>B. Received by (Printed Name)  <i>Mark Covais</i></p> <p>C. Date of Delivery</p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes          If YES, enter delivery address below: <input type="checkbox"/> No</p>
<p>1. Article Addressed to:  <b>MARK COVAIS</b>  <b>DIRECTOR OF OPERATIONS</b>  <b>THE TRUMP ENTERPRISE INVESTMENTS LLC</b>  <b>40 WALL STREET-32ND FLOOR</b>  <b>NEW YORK NY 10005-1304</b></p>	<p>3. Service Type  <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail  <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise  <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p> <p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>
<p>2. Article Number          (Transfer from service label) <b>7011 0470 0001 8794 3022</b></p>	
<p>PS Form 3811, February 2004 Domestic Return Receipt 102595-02-M-1540</p>	

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NEW YORK NY 10022

Postage	\$ 0.44	0037
Certified Fee	\$2.85	55
Return Receipt Fee (Endorsement Required)	\$2.30	Postmark Here
Restricted Delivery Fee (Endorsement Required)	\$0.00	
<b>Total Postage &amp; Fees</b>	<b>\$ 5.59</b>	<b>09/12/2011</b>

Sent To  
**George A. Sorial, Esq The Trump Organization**  
 Street, Apt. No. or PO Box No. **725 FIFTH AVE,**  
 City, State, ZIP+4 **NEW YORK NY 10022-2519**

U.S. Postal Service  
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NEW YORK NY 10005

Postage	\$ 0.44	0037
Certified Fee	\$2.85	55
Return Receipt Fee (Endorsement Required)	\$2.30	Postmark Here
Restricted Delivery Fee (Endorsement Required)	\$0.00	
<b>Total Postage &amp; Fees</b>	<b>\$ 5.59</b>	<b>09/12/2011</b>

Sent To  
**MARK COVAIS THE TRUMP ENTERPRISE INVESTMENTS**  
 Street, Apt. No. or PO Box No. **40 WALL ST 32ND FLOOR**  
 City, State, ZIP+4 **NEW YORK NY 10005-1304**

Robert Guillo  
94 Shoreview Road  
Manhasset NY 11030-1838  
Phone: (516) 627-3394  
Email: [bobg94@optonline.net](mailto:bobg94@optonline.net)

September 20, 2011

George A. Sorial, Esq.  
Managing Director International Development  
and Assistant General Counsel  
The Trump Organization  
725 Fifth Avenue  
New York NY 10022-2519

Sent by FAX to: 1-212-980-3821

RE: The Trump Entrepreneur Initiative LLC  
formerly: Trump University LLC  
Demand for refund of \$35,995.00

Dear Mr. Sorial:

Thank you for phoning me today.

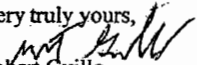
In response to your question regarding what type of degree did I expect from Trump University LLC. I never expected a degree.

In the State of New York there are many colleges and universities that are approved by the Department of Education and/or The Board of Regents that offer certificates and noncredit courses in addition to undergraduate and graduate degrees. Page 2 of this FAX is an example of more than 500 noncredit real estate courses that are offered by The Shack Institute of Real Estate of New York University.

As we discussed, the retreats that we attended were designed to get the attendees to pay for additional programs that were offered by the presenters which cost thousands of dollars. Mark Covais reviewed some of the recorded sessions and I have no doubt that his report to you confirmed the information that I gave to you in my letters.

Since you told me that you would not refund the \$35,995.00, I will file a consumer complaint with the Attorney General of New York and take whatever other legal action that is available to me.

Very truly yours,

  
Robert Guillo

000239



## REAL ESTATE

Our courses in real estate, offered through the NYU Schack Institute of Real Estate, help industry professionals stay on the leading edge in today's challenging and exciting market. Courses cover finance, development, leasing, facility and property management, title issues, and other topics of importance to the industry. Also offered are courses that fulfill the New York State continuing education requirements for licensed real estate professionals and programs that help those new to the field prepare for the salesperson's licensing or appraisal examinations.

Our offerings in Real Estate include:

- More than 500 noncredit courses and seminars offered annually through the NYU Schack Institute of Real Estate.
- Certificate programs: Real Estate Finance and Investment (page 3), Global Real Estate (page 3), Real Estate Development (page 4), Commercial Property Management (page 5), NEW Residential Property Management (page 6), and Facility Management (page 7).
- National conferences in capital markets and REIT mergers and acquisitions featuring distinguished speakers who offer their professional expertise and predictions in real estate market trends (this page).
- Master of Science in Real Estate, which provides a thorough grounding in the analysis, development, financing, and operation of investment property worldwide. A Graduate Certificate in Real Estate is also offered through the program.
- NEW Master of Science in Real Estate Development, which embraces the role of developers, preparing students to produce real estate projects strategically and effectively from beginning to end.

For information, visit [scps.nyu.edu/realestate](http://scps.nyu.edu/realestate) or call (212) 998-7200.

## CONTENTS

Finance and Investment	1
Development	3
Property Management	4
Facility Management	5
Appraisal Licensing, Certification, and Continuing Education	6
Salesperson's and Broker's Licensing and Continuing Education	7
Professional Development Seminars	11
Continuing Legal Education Master Class Series	12
Personal Investment Workshops	12

## INFORMATION SESSION

Real Estate: Sales, Appraisal, Finance, Investment, Development, and Management

Information sessions include discussions about industry news and career opportunities, presentations on curricula, and a chance to ask questions of faculty and staff. No RSVP is required, but please be punctual. For more information, call (212) 998-7200.

Wednesday, 6-8 p.m., August 31  
NYU Midtown Center  
11 West 42nd Street, 4th Floor

## FINANCE AND INVESTMENT

Whether you're just starting out or an established finance and investment industry professional, we have courses to meet your needs and interests—from the fundamentals of real estate finance and cash flow analysis to real estate capital markets and investment real estate syndication—and more.

## FALL INTENSIVES

The Business of Real Estate: Finance and Investment  
REF11-CE9630/\$1,995

Sec. 1: Mon.-Fri. 9 a.m.-4.30 p.m., Oct. 3-7 (5 sessions)

This intensive one-week program provides a solid foundation for understanding the high-stakes business of commercial real estate. Through exposure to actual cases, students learn the real issues involved in the creation of real estate assets and real estate value. Topics covered include real estate valuation concepts and techniques; the real estate investment framework; capitalization and the income statement; real estate financial analysis; the pro forma; financing and underwriting principles and practices; capital markets, REITs, and debt securitization; and investment analysis/analyzing the deal. First day check-in and materials distribution at 8:45 a.m. NYCEM-22.5 hours.

Real Estate Investment Banking and Capital Markets:  
Understanding Value During the Enterprise Life Cycle  
REF11-CE9685/\$1,995

Sec. 1: Mon.-Fri. 9 a.m.-4.30 p.m., Nov. 14-18 (5 sessions), Scott L. Robinson, visiting clinical assistant professor, NYU Schack Institute of Real Estate, and Marish Srivastava, director, Brahma Management LTD.

Strengthen your knowledge of corporate finance and capital markets through an examination of how the public capital markets value commercial real estate investments and firms and assess risk. Acquire a comprehensive understanding of value creation during the life cycle of a real estate firm with a focus on the role investment banking plays in reallocating risk and enhancing value. Gain hands-on knowledge of this process through a mixture of conceptual frameworks, practical applications, and case studies. Topics include Initial Public Offerings (IPOs), transitioning from private to public markets; secondary equity offerings; corporate unsecured debt; the nuances of leverage; mergers and acquisitions (M&A); and Leveraged Buy-Outs (LBO). Students in this course attend the 43rd Annual Conference on Capital Markets in Real Estate on Thursday, November 17.

## NYU SCHACK INSTITUTE NATIONAL CONFERENCES

The NYU Schack Institute of Real Estate hosts a selection of national conferences in premier midtown hotels. Each conference presents a distinguished panel of speakers who offer their expertise in real estate market trends and predictions.

Conferences include:

- Capital Markets and Pension Fund Investment in Real Estate  
Waldorf-Astoria Hotel, Fall 2011
- REIT Mergers and Acquisitions, Spring 2012

For more information, visit [scps.nyu.edu/realestate](http://scps.nyu.edu/realestate).

## **Appendix A**

# Trump University

This certifies that

**Alex Brillo**

has successfully completed the requirements of

**Quick Start Real Estate Retreat**  
**Certificate of Accomplishment**

Awarded by Trump University

The Fourth Day of October in the Year of Two Thousand and Nine

*Alex Brillo*

Ronald J. Trump  
Chairman, Trump University

*Michael Sexton*

Michael Sexton  
President, Trump University

Shstructor  
Trump University

TRUMP  
UNIVERSITY

# Trump University

This certifies that

**Bob Brilla**

has successfully completed the requirements of

**Profit From Real Estate Investing**  
**Certificate of Accomplishment**

Awarded by Trump University

The Twenty-Fifth Day of September in the Year of Two Thousand and Nine



Ronald J. Trump  
Chairman, Trump University



Michael Sexton  
President, Trump University

Instructor  
Trump University

TRUMP  
UNIVERSITY



# **Exhibit L18**



Better Business Bureau  
Serving Metropolitan New York, Long Island, and the Mid-Hudson Region

30 East 33rd Street  
New York, NY 10016  
(212) 533-6200  
FAX  
www.newyork.bbb.org

**Case #:** 8196808

**Consumer Info:** Henderson, Danielle  
7137 E. Inglewood St.  
MESA, AZ 85207  
4802411304  
daniellehenderson@gmail.com

**Business Info:** Trump University  
40 Wall Street 32nd Floor  
New York, NY 10005  
-

**Date Filed:** 11/18/2010

**Nature of the Complaint:** Refund / Exchange Issues

**Consumer's Original Complaint:**

Service was never rendered and a refund of our money (though it was guaranteed) was never given. We have since contacted 5 different associates within the company in order to obtain assistance regarding my refund. The company has never responded.

This is part of the email that was sent (and never responded to by ANYONE at Trump University):

Sent: April 29, 2010 To: 'msexton@trumpuniversity.com' Cc: 'szazbeck@trumpuniversity.com'; 'mbloom@trumpuniversity.com'; 'mjobina@trumpuniversity.com'; 'kjohnson@trumpuniversity.com' Subject: Complaint and Refund Request

AZ was in a State of Emergency caused by excessive rain and run-off damage...suffering from flooding... My...flooding was now totally dependent on a sump pump...words to Katie Johnson were, "I can't believe you didn't cancel this when we're in a State of Emergency."...she extended an invitation to let us attend a future "retreat". I specifically asked if any conditions would be different from what we had been told and was assured that everything would be exactly the same. We didn't attend one minute of the first day of training, yet our "refund window" was immediately and without our knowledge slammed shut. ...we would have stayed for the seminar had we been told the truth....it was only Trump university's commitment to refund full payment to dissatisfied participants...that motivated us to continue our registration. ....your commitment had undisclosed contingencies only added to our negative impressions of Trump University. This refund request IS about integrity, ethics and professionalism. Whether accidental or intentional, we were blatantly misled or misinformed.

Since I in fact am the student that officially paid the \$1000 for the class, I am filing the formal complaint.

**Consumer's Desired Resolution:**

Full Refund

000245

**Business/Consumer Response & Rebuttals:**

**07/17/2010**

**Mrs. Danielle Henderson**

The business has not responded to me directly

Better Business Bureau:

At this time, I have not been contacted by Trump University regarding complaint ID 8196808.

Sincerely,

Danielle Henderson

---

**09/21/2010**

**Mrs. Danielle Henderson**

The business has not responded to me directly

Better Business Bureau:

At this time, I have not been contacted by Trump University regarding complaint ID 8196808.

Sincerely,

Danielle Henderson

---

**11/18/2010**

**April B. Neumann**

Respond to Complaint

Attached is The Trump Entrepreneur Initiative's response to your complaint.

---

# Exhibit L19





Better Business Bureau  
Serving Metropolitan New York, Long Island, and the Mid-Hudson Region

30 East 33rd Street  
New York, NY 10016  
(212) 533-6200  
FAX  
www.newyork.bbb.org

**Case #:** 8122007

**Consumer Info:** Holcomb, Nelson  
1433 Alma St  
PALO ALTO, CA 94301  
6502234757  
rob.holcomb@gmail.com

**Business Info:** Trump University  
40 Wall Street 32nd Floor  
New York, NY 10005  
8888265953

**Date Filed:** 3/3/2010

**Nature of the Complaint:** Refund / Exchange Issues

**Consumer's Original Complaint:**

I attended the afternoon sales presentation on february 2, 2010 and signed up for the 2 day training with the understanding I could cancel the registration withint 3 days.The paperwork also stated I had 3 days to cancel and to cancel I was requested to fax the details to a specific phone number.I did this on February 5, 2010 and then called Trump University to verify the following week on February 9, 2010. [It was also implied to me that the check would not be deposited until after hte 3 day cool-off period. which was not true]

I spoke with a Mark corvais (sp?) several times during the week, and on February 10, 2010 I was told that I was eligible for a refund, but that I should try and get my bank to reverse the charge, but since it was a check there was nothing that could be done since the check had cleared. On the 11th of February, 2010 the offices at trump University were closed. On the 12th of February I was told by Mark Corvais that the refund had been processed and that I could expect the check after the next "check writing cycle"; which was once per week.

It has been 3 weeks now and I haven't heard anything from Trump University.

**Consumer's Desired Resolution:**

Just a refund.

**Business/Consumer Response & Rebuttals:**

03/26/2010  
Brad Schneider

Respond to Complaint  
See attached file

---

# Exhibit L20



Better Business Bureau  
Serving Metropolitan New York, Long Island, and the Mid-Hudson Region

30 East 33rd Street  
New York, NY 10016  
(212) 533-6200  
FAX  
www.newyork.bbb.org

**Case #:** 8168031

**Consumer Info:** Jashnani, Girish  
4962 Cappy Terrace  
New York , NY 10022

**Business Info:** Trump University  
40 Wall Street 32nd Floor  
New York, NY 10005

jashnani18@gmail.com

**Date Filed:** 4/26/2010

**Nature of the Complaint:** Refund / Exchange Issues

**Consumer's Original Complaint:**

The consumer states:

I would like to get the refund back for the seminar fees (\$1495). I attended one of the introductory seminars by the Trump University. At the introductory seminars, I was told that I would be given the entire fees back if I chose not to attend the seminar. I called several people before the actual seminar/boot camp and requested that I should be refunded the fees back since I had no intention of attending the seminar. After at least one dozen calls to different people at the University, I haven't received the fees back I would like to get a full refund of \$1495.

**Consumer's Desired Resolution:**

See Complaint Text

000251

**Business/Consumer Response & Rebuttals:**

# Exhibit L21



PRINT

Consumer Sentinel Network Complaints

Record # 1 / Consumer Sentinel Network Complaints	
Reference Number: 40003029	Originator Reference Number:
Language: English	Contact Type: Complaint
Source: Consumer	DNC? N
Comments: My husband and I paid to Trump University \$25,000.00 to be part of a real estate investment group. After the \$25,000.00 was paid, we did not get the services we were promised for our money. We have made several attempts to contact Trump University with no success, we decide to seek for your assistance	
Was the complaint resolved?:	Complaint Resolution:
Data Reference:	
Entered By: ECGUSER	Entry Date: 8/27/2012
Updated By:	Updated Date:
Complaint Source: Econsumer.gov	Product Service Code: Other (Note in Comments)
Amount Requested: \$25,000.00	Amount Paid: \$25,000.00
Payment Method: Bank Account Debit	Agency Contact: Internet
Complaint Date: 8/27/2012	Transaction Date: 2/15/2010
Initial Contact: Mail	Initial Response:
Statute/Rule:	Law Violation: Other Misrepresentation (Explain in Comment Field) Merchandise or Service Not in Conformity with Order
Topic:	Dispute with Credit Bureau?:
Dispute with Credit Bureau - Responded?:	Dispute with Credit Bureau - Resolved to Satisfaction?:
Member of armed forces or dependent?: No	
Consumer Information	
Consumer	
Complaining Company/Org:	
First Name: Lindia	Last Name: Joseph
Address 1: 2 Marden Avenue	Address 2:
City: DORCHESTER	State: Massachusetts
Zip: 02124	Country: UNITED STATES
Home Number: 1-617-2836104	Work Number: 1-617-7342300
Fax Number:	Ext:
Email: lindiajoseph@gmail.com	Age Range:
Military Service Branch:	Soldier Status:
Soldier Station:	

Subject	
<b>Subject:</b> Trump University	
<b>Address:</b> 40 Wall Street 32nd Floor	
<b>City:</b> New York,	<b>State/Prov:</b> New York
<b>ZIP:</b> 10005	<b>Country:</b> United States
<b>Email:</b> tbrinkman@trumpuniversity.com	<b>URL:</b> TrumpUniversity.com
<b>Area Code:</b> 917	<b>Phone Number:</b> 6925420
<b>Ext:</b>	<b>Subject ID Type:</b>
<b>Subject ID Issuer State:</b>	<b>Subject ID Issuer Country:</b>
<b>Representative Name:</b> Tiffany Brinkman	<b>Title:</b>



# **Exhibit L22**



Better Business Bureau  
Serving Metropolitan New York, Long Island, and the Mid-Hudson Region

30 East 33rd Street  
New York, NY 10016  
(212) 533-6200  
FAX  
www.newyork.bbb.org

**Case #:** 7961204

**Consumer Info:** Krauss, Steve  
3435 Victor Avenue  
BROOKHAVEN, PA 19015  
2156941289  
sjkts@hotmail.com

**Business Info:** Trump University  
40 Wall Street 32nd Floor  
New York, NY 10005  
-

**Date Filed:** 8/18/2009

**Nature of the Complaint:** Service Issues

**Consumer's Original Complaint:**

I took a seminar with Trump University after which i was heavily pursued to sign up for a 6 month mentoring program. I was contacted on a regular basis to sign up. After asking many questions and having the program details described to me I felt like this was what I was looking for. I was told a mentor would be assigned to me and available to me via email or telephone 10am-10pm M-F. I was to email real estate properties of interest to my mentor and he would then discuss with me options. The first property of interest i emailed them and did not hear back from my mentor for ten days. While waiting I also called my mentor and emailed the gentleman that signed me up for the program with my concerns. During the ten days the property was no longer available. This program was described to me very differently. I was told that i would have guidance in lending for the purchase of properties and again advice on properties of interest. When i finally spoke with my mentor we spent an hour going over a business plan and his advice in the end was to join a local real estate group. I contacted Trump University with my concerns and waited several days with no response and then finally tried again. I spoke with 1 gentlemen that said he would not refund the money. Again, I feel frustrated and this program is not what was described to me. I would not want anyone to sign on for this because once you pay your money all contact just seems to stop and there isn't much guidance happening.

**Consumer's Desired Resolution:**

Because the service described and promised were not delivered I am requesting a full refund

**Business/Consumer Response & Rebuttals:**

12/07/2009  
Brad Schneider

Respond to Complaint  
Business Response

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12/07/2009  
Mr. Steve Krauss

The business's response does not resolve my complaint.

Better Business Bureau:

I have reviewed the response made by the business in reference to complaint ID 7961204, and have determined that this does not resolve my complaint.

To assist the BBB in bringing this matter to a close, please explain why this does not resolve your complaint:

In reading this response I can see that they are not taking this complaint very serious. My last name is spelled three different ways in this faxed document. What an embarassment for the Trump University. Obviously I am not going to receive the refund that I deserve but this response shows that the Trump University is a joke.

Sincerely,

Steve Krauss

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01/15/2010  
Brad Schneider

Respond to Complaint

Business Response to Rejection

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01/15/2010  
Mr. Steve Krauss

The business's response does not resolve my complaint.

Better Business Bureau:

I have reviewed the response made by the business in reference to complaint ID 7961204, and have determined that this does not resolve my complaint.

To assist the BBB in bringing this matter to a close, please explain why this does not resolve your complaint:

The response could not be read . I was unable to open the response attachment, therefore it is not resolved.

Sincerely,

Steve Krauss

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**01/27/2010**

**Mr. Steve Krauss**[mailto:sjkts@hotmail.com]

I accept the business's response to this complaint.

Better Business Bureau:

I have reviewed the response made by the business in reference to complaint ID 7961204, and find that this resolution is satisfactory to me and the matter has been resolved.

Sincerely,

Steve Krauss

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**03/01/2010**

**Brad Schneider**

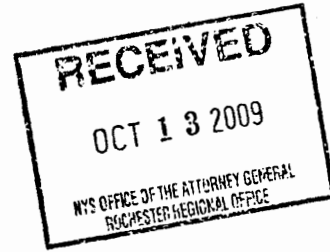
Respond to Complaint

Please see attached

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# **Exhibit L23**

October 8, 2009



To whom it may concern:

**My complaint is regarding real estate deceptive business practices and fraud being conducted by Prosper Inc. / Trump Institute in Rochester, NY (aka Business Strategies Group).**

Prosper Inc. / Trump Institute and its representatives agreed to provide me with a real estate training mentorship to create a real estate investing business that could earn, according to their representatives, up to tens of thousands of dollars monthly income and potentially much more. My enrollment was based around my need to learn every legal facet of real estate investing designed to create an additional income stream for me. This was based on the fact that I had no real estate investing background or knowledge of how to navigate this business due to my purely creative background, which all of the Prosper Inc. / Trump Institute representatives were made aware of.

Since the beginning of their \$9,495 program, I have concluded that Prosper Inc. / Trump Institute representatives misled me consistently, and did not provide what I signed up for. I have come to the additional conclusion that neurolinguistic programming and high pressure sales tactics based on the psychology of scarcity are used by their representatives to get observers to become participants in their program. This included direct enrollment by their staff with an HSBC/Prosper Learning credit limit for supposed real estate transactions but truly to purchase their program as well as having their staff review interviewees' financial status during the interview call to assess their investment capabilities, for the Prosper Inc. / Trump Institute program, of course. These are unethical tactics designed to get a large investment from the prospects and then not teach anything of validity. Furthermore, their legal disclaimers do not provide them the leeway to utilize unfair and deceptive business practices at their gain and their students' peril—students who place their trust in them at a costly price. It is a highly irresponsible and unlawful on their part as well as extremely deceptive.

Because of the fact that they comingled the opening of a credit line with HSBC, Prosper Inc., and Trump Institute with high pressure sales tactics, fraudulent claims, gathering of financial information without considering whether or not students could pay back their lines of credit, THEIR LEGAL DISCLAIMER IS NULL AND VOID as this violates state and federal criminal statutes in many ways. My final conclusion based on discussions with counsel is that there was a gargantuan amount of misleading, fraudulent, and predatory behavior taking place that suggests legal cause for action.

For further details, please contact me.

Thank you in advance for your time and investigation into this troubling matter.

Sincerely,

000261

  
Tana Makaeff

3334 E Coast Hwy #423

Corona Del Mar, CA 92625

949 387 8430

[tmakaeff@gmail.com](mailto:tmakaeff@gmail.com)



STATE OF NEW YORK  
 OFFICE OF THE ATTORNEY GENERAL  
 BUREAU OF CONSUMER FRAUDS AND PROTECTION  
 120 Broadway, 3rd Floor  
 New York, NY 10271-0332  
 Tel. (212) 416-8345 Fax (212) 416-8787

COMPLAINT FORM  
 Consumer Hotline For Hearing Impaired  
 1 (800) 771-7755 TDD (800) 788-9898

RECEIVED BY  
 CONSUMER FRAUDS & PROTECTION BUREAU  
 DEC 11 2009  
 NYC OFFICE OF THE ATTORNEY GENERAL  
 120 BROADWAY CITY OFFICE

1. PLEASE BE SURE TO COMPLAIN TO THE COMPANY OR INDIVIDUAL BEFORE FILING.
2. PLEASE TYPE OR PRINT CLEARLY IN DARK INK.
3. YOU MUST COMPLETE THE ENTIRE FORM. INCOMPLETE OR UNCLEAR FORMS WILL BE RETURNED TO YOU.
4. MAKE SURE YOU ENCLOSE COPIES OF IMPORTANT PAPERS CONCERNING YOUR TRANSACTION.

<b>CONSUMER</b>		
YOUR NAME <i>Tarla Makacff</i>		HOME TELEPHONE NUMBER <i>949-387-9430</i>
STREET ADDRESS <i>3334 E. Coast Hwy # 423</i>		BUSINESS TELEPHONE NUMBER <i>949-387-8430</i>
CITY/TOWN <i>Corona Del Mar</i>	COUNTY <i>Orange</i>	STATE ZIP <i>CA 92625</i>
<b>COMPLAINT</b>		
NAME OF SELLER OR PROVIDER OF SERVICES <i>Trump University</i>		NAME OF OTHER SELLER OR PROVIDER OF SERVICES
STREET ADDRESS <i>40 Wall St. 32nd Flr.</i>		STREET ADDRESS
CITY/TOWN <i>New York NY</i>	STATE <i>NY</i>	ZIP <i>10005</i>
TELEPHONE NUMBER <i>888 821 5953</i>		TELEPHONE NUMBER
DATE OF TRANSACTION <i>8/10/08 - 1st transaction</i>	COST OF PRODUCT OR SERVICE <i>\$ 34,995.00</i>	HOW PAID (Check those which apply) <input type="checkbox"/> Cash <input type="checkbox"/> Check <input type="checkbox"/> Credit Card <input type="checkbox"/> Other
DID YOU SIGN A CONTRACT? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	WHERE DID YOU SIGN THE CONTRACT? <i>Unmanned City NY at a Trump "reboot"</i>	DATE SIGNED <i>8/10/08</i>
WAS PRODUCT OR SERVICE ADVERTISED? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	WHERE WAS IT ADVERTISED? <i>Internet DuFT heard about it through word of mouth</i>	DATE ADVERTISED <i>All the time</i>
TYPE OF COMPLAINT (e.g. car, mail order, etc. Use the reverse side of this form to provide details) <i>RE fraud</i>		
DATE YOU COMPLAINED TO THE COMPANY OR INDIVIDUAL <i>8/2/08</i>	PERSON CONTACTED <i>Tiffany Brunkman</i>	JOB TITLE <i>Sales Rep</i>
NATURE OF RESPONSE <i>Concerned regarding receiving adequate training for the price</i>		DATE OF RESPONSE <i>8/2/08</i>
HAS MATTER BEEN SUBMITTED TO ANOTHER AGENCY OR ATTORNEY? (If "Yes," give name and address) <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <i>Ny BBB, Consumer Affairs Dept of NY State, Manhattan DA etc</i>		
IS COURT ACTION PENDING? (Please describe as necessary) <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
<b>ADDITIONAL INFORMATION</b>		
MANUFACTURER OF PRODUCT <i>Same as above</i>		PRODUCT MODEL OR SERIAL NUMBER
ADDRESS		WARRANTY EXPIRATION DATE
DID BUSINESS ARRANGE FINANCING? (If "Yes," give name and address of bank or finance company) <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		

PLEASE DESCRIBE COMPLAINT ON REVERSE SIDE



BRIEFLY DESCRIBE YOUR COMPLAINT

Please see attached.  
For over a year, I have complained to Trump University regarding their inefficient RE teachings that are more webinars that became sales platforms than real training. They completely dismissed me at every pass once the money was collected - \$34,995.00. Then I found out recently that their teachings are CRIMINAL. I have attached CA civil codes. I would like a FULL reimbursement.

WHAT FORM OF RELIEF ARE YOU SEEKING? (e.g., exchange, repair or money back, etc.) Full refund.

WHO REFERRED YOU TO THIS OFFICE? I knew to contact you.

READ THE FOLLOWING BEFORE SIGNING BELOW

PLEASE ATTACH TO THIS FORM PHOTOCOPIES of any papers involved (contracts, warranties, bills received, canceled checks, correspondence, etc.). DO NOT SEND ORIGINALS.

NOTE: In order to resolve your complaint, we may send a copy of this form to the person or firm about whom you are complaining.

In filing this complaint, I understand that the Attorney General is not my private attorney, but represents the public in enforcing laws designed to protect the public from misleading or unlawful business practices. I also understand that if I have any questions concerning my legal rights or responsibilities, I should contact a private attorney. I have no objection to the contents of this complaint being forwarded to the business or person the complaint is directed against. The above complaint is true and accurate to the best of my knowledge.

I also understand that any false statements made in this complaint are punishable as a Class A Misdemeanor under Section 175.30 and/or Section 210.45 of the Penal Law.

Signature: [Handwritten Signature] Date: 12-1-09

HAVE YOU ENCLOSED COPIES OF IMPORTANT PAPERS?

Return to: Office of the Attorney General  
Bureau of Consumer Frauds and Protection  
120 Broadway, 3rd Floor  
New York, NY 10271-0332

December 1, 2009

Attorney General Andrew Cuomo's Office  
Bureau of Consumer Frauds and Protection  
120 Broadway  
New York, NY 10271

Attn: John Carlos and Joel

To whom it may concern,

I wrote in early October 2009 and recently called in to follow up. It sounds as though my letter did not make it specifically to your bureau as it had most likely just the general mailing address therefore, I am writing you again.

I attended a \$1,500 Trump University Fast Track to Foreclosure Training retreat where I was introduced to the \$34,995 Trump University mentorship and program in the final hours. I reluctantly purchased due to the speaker's convincing pitch of guaranteed success should his tactics be implicitly followed as well as the salesperson's high pressured sales techniques and guarantee that my first deal would earn me in the ballpark of the \$34,995 expenditure so as to immediately pay off my Trump University debt. No such thing occurred.

Since the beginning of their program, I have concluded that Trump University representatives misled me consistently, and did not provide what I signed up for, using neurolinguistic programming and high pressure sales tactics based on the psychology of scarcity to get observers to become participants in their program. This included instruction by the speaker to raise your credit limit for real estate transactions only to then tell the attendants to use that same credit limit to purchase their program as well as having representatives review attendants' financial statements to assess their investment capabilities. These are unethical tactics designed to get a large investment from the prospects most guaranteed to be able to pay for their program and then not teach anything of validity, instead consistently trying to get students to purchase more and more at each event. It also appears that their mentors are pushing specific real estate deals that they stand to profit from, however unprofitable for the student. I have also been advised by real estate and criminal counsel that posting bandit signs among other aspects of their teachings are unlawful. I have now found that the Internet is rampant with similar complaints of students who have been cheated out of tens of thousands of dollars as well and who have requested refunds directly to the "university" like me but who have been denied any refunds. These "students" have blogged about the need for class action lawsuits as well as law enforcement assistance to put this fraud to an end during a sad economic time of our country where predators pervade.

My final conclusion based on discussions with counsel is that there was a gargantuan amount of misleading, fraudulent, and predatory behavior taking place that suggests legal cause for action and that I am due an entire refund of the \$34,995.

Please find enclosed just some of the supporting evidence. Should you contact me to investigate this further, I have much more I can share.

Sincerely,



Tarla Makaeff  
3334 E Coast Hwy #423  
Corona Del Mar, CA 92625  
949 387 8430  
[tmakaeff@gmail.com](mailto:tmakaeff@gmail.com)

000265

Jack Mahoney  
Trump University  
40 Wall Street, 32<sup>nd</sup> floor  
New York, NY 10005

Fax: 212-937-3830

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Dear Mr. Mahoney:

In August 2008, I attended a \$1,500 Trump University Fast Track to Foreclosure Training retreat where instead of learning any full-fledged real estate techniques, I was introduced to your \$34,995 Trump University mentorship and program in the final hours. I reluctantly purchased due to James Harris' convincing pitch of guaranteed success should his tactics be implicitly followed as well as Tiffany Brinkman's high pressured sales techniques and guarantee that my first deal would earn me in the ballpark of the \$34,995 expenditure so as to immediately pay off my Trump University debt, thus leaving only profits for the future. A few days after I left this seminar, I didn't have a good feeling and I called Ms. Brinkman regarding her promise of return on the \$34,995 and what I would learn on my mentorship, and her story immediately changed. Now, she said that she never promised anything and to read the fine print on the pink contract I signed. In fact, her constant emails showed her concern was undoubtedly more focused on collecting every last dollar of the \$34,995 rather than addressing my needs. What customer service for such a large expenditure. This type of behavior just continued through every experience I had.

Trump University and its representatives agreed to provide me with a real estate training mentorship to create a real estate investing business that could earn, according to Mr. Harris, up to tens of thousands of dollars monthly income and potentially much more. My enrollment was based around my need to learn every legal facet of real estate investing designed to create a new income stream for me. This was based on the fact that I had no real estate investing background or knowledge of how to navigate this business due to my purely creative background as a writer and fashion designer, which all of the Trump University representatives were made aware of.

Immediately on the day of signing up for your \$34,995 program, Mr. Harris further went on to tell me personally that he would now be available by phone and e-mail to me and soon emailed me "we can do a ton together" and then I never heard from him again. At the event, he also publicly announced to the signed up group that deals would now be coming our way via e-mail, and e-mailed "these are starting to POUR IN NOW" referring to a Houston deal. Only one deal ever came, and it was outside of Trump University's guidelines as Mike Kasper, a partner to mentor Rick McNally, referred a deal he would financially benefit from and I would only earn \$40/month positive cash flow from, known as the Fountainview Duplexes in Houston, which clearly represents a conflict of interest and an investment not in my best interest. I have also heard at least two other

student complaints about being lied to about the condition of the property and had your own representative, Stephen Gilpin, tell me to never accept anything below \$100/month positive cash flow.

Beginning August 2008, I began a series of phone calls and email correspondence for my mentorship with Rick McNally and Mike Kasper. Mr. McNally claimed he was worth \$14 million to which I cannot speak. However, Mr. Kasper claimed he was worth over \$125 million with his Streamline Tower project in Las Vegas which had all along been on the road to bankruptcy with dissatisfied buyers going to federal court and the Streamline partners refusing to refund deposits. I don't think this is the image Trump University would want to portray for success in real estate and so it is surprising that mentors who taught me would find themselves in such negative positions, much less lying about their financial worth to create an inaccurate picture. During my 3-day mentorship, we spent 2 days looking at properties, a half day at Home Depot and lunch, the last hour or so on numbers, and nothing on contracts. I could easily have gotten a free education from a real estate agent, Home Depot employee, and a \$25 book on real estate contracts without the \$25,000 price tag that is associated with this. After the mentorship, Mr. McNally and Mr. Kasper disappeared other than a couple of short 2 minute phone calls while they were on other mentorships. This is in complete opposition to what I was promised: an ongoing mentor who I would have access to for up to a year.

The five "retreats" were no better. There was an overwhelming amount of broad information but nothing substantial enough to implement. Rather, there were more up sells at the end of each course, encouraging students to spend additional monies above and beyond the **\$34,995 plus the variable APR finance charges, interest fees, and late fees**. In the Wealth Preservation: Asset Protection Retreat, little was done other than to pitch the services of J.J. Childers and the Childers Financial Group who could create this asset protection for you with a \$5,000-\$10,000 package. In the Quick Turn: Wholesale/Lease Option Retreat Steve Goff taught who according to the *LA Times* has gone through "bankruptcy, two divorces and had his own home foreclosed upon" yet I am supposed to learn from his success? In the Creative Financing Retreat, Tim Gorsline made grand statements of a \$1 million RV he bought with his \$50 million net worth and then promised to help me as I had not been helped adequately in my mentorship. He then disappeared. I have verbal and written confirmation of this occurrence as well as numerous online testimonies against him doing the same thing to other students. In the Commercial and Multifamily Retreat, there was such discord with the information that George Fuchs taught that a new class was offered with a new teacher as well as a "web series follow-up" according to Jason Schauer due to "popular demand." I did not sign up at \$5,000 per course to be pitched other products, not helped, and receive little useful, and vague at best, information, then requiring more and more hours of study for no benefit. These retreats were more like infomercials.

Meanwhile, I let Jason Schauer from your corporate office know that I was dissatisfied with my mentorship and he arranged several phone calls with Stephen Gilpin which did

not nearly cover all of the missing components of my mentorship such as the contracts. To this end, I attempted to have Paul Reisner also from your corporate office right the wrong by sending a different mentor to my home. I suggested Troy Peterson to which Mr. Reisner offered some calls but no additional in person help, and, who further told me that there were no other unhappy students which I know for a fact is a blatant lie. There is rampant dissatisfaction amongst your students at the seminar. But nonetheless, Mr. Reisner had to tell me that I wasn't working hard enough to make money, which apparently is a frequent line used from your staff according to online complaints, and something which could not be further from the truth. Mr. Reisner did his best though to use reverse psychology and place all of the blame on me, someone who is educated and has earned 6 figures on her own in the past. Mr. Reisner very well knows it is virtually impossible to work out numbers and contracts via phone calls but despite my efforts to work with him and even speak to Brad Schneider further after sending him a lengthy email detailing all of my concerns, I was left with the phone calls and no ability at a refund, although I am very aware of students receiving new in person help or refunds. I am no less deserving of such assistance. I still, to this date, have little understanding of all of the contracts necessary to perform the more complex real estate deals, a very integral part to this business.

I further learned after a couple of calls from Mr. Peterson himself that he had been homeless and bankrupt once I probed a little further. Again, it is quite disturbing to be told that I am not working hard enough when apparently your own experts have gone under financially yet keep touting how easy it is to be successful in real estate.

Furthermore, I did try my hand at real estate investing per Mr. Reisner's suggestions, only to be led down another path of questionable business practices where mentor Tad Lignell introduced me to the supposed billion dollar real estate agent, Noah Herrera, of Las Vegas, only to be misquoted comps for a property I purchased at a significant price difference, rendering the deal unprofitable and placing my investment in jeopardy. This represents another conflict of interest as Mr. Lignell is pushing specific business that is putting students at risk. At this junction, your organization becomes liable for your representatives' actions with your students, penetrating your legal disclaimers.

The fact is you have many unhappy students and this is documented by your own representatives including Jason Schauer who invited me to your Wealth Summit seminar a couple of months ago because, according to them, your existing California students needed more information to close the gap. However, the event ended up being the exact opposite and just another venue to sell four more courses each valued at \$495 - \$1,995. I also have verbal and written evidence indicating the level of discontent from your other 99.9% of students. I would venture to guess for every 1 successful student, you have hundreds who would attest to their dissatisfaction based on all of the evidence I have gathered with much discussed interest of students in wanting to pursue as significant legal action as class action lawsuits. This speaks volumes. In fact, bulletin boards on the Internet are so prevalent with rip off reports about Trump University that

I will not waste my time going into the stacks of evidence I have further gathered from this venue.

In any case, during all of this time I did my best to comply with every Trump University representatives' suggestions and try every possible direction, and, unknowingly, from the beginning I bought into the pumped up rally type mentality at your retreats because I expected the best from the Trump name and could not imagine anything less. I even went above and beyond and paid the Trump Institute additional funds to try to seek more assistance as I wasn't getting any from Trump University. I imagined I would at least have the blanks filled in but I experienced more inept behavior from your sister company.

I am completely dismayed at the lack of customer service I have experienced and lack of knowledge I have received for the **\$34,995 plus the variable APR finance charges, interest fees, and late fees** investment and numerous promises. Because of your failure to deliver what your program promised, I was unable to earn any income as I do not have the knowledge that was guaranteed. In addition, the legality of some of the transactions and techniques your Company teaches are far from ethical. This has resulted in me, losing a significant investment I made with Trump University, as well as the other fees that come with operating a new business, and most importantly a significant amount of time lost that cannot be regained--time that could have been devoted to my other legitimate businesses and would have, had I known you would not deliver on teaching the promised tactics.

Since the beginning of your program, I have concluded that Trump University representatives misled me consistently, and did not provide what I signed up for. I have come to the additional conclusion that neurolinguistic programming and high pressure sales tactics based on the psychology of scarcity are used by your representatives to get observers to become participants in your program. This included instruction by Mr. Harris to raise your credit limit for real estate transactions only to then tell the attendants to use that same credit limit to purchase your program as well as having representatives review attendants' financial statements to assess their investment capabilities, for the Trump University program, of course. As you well know, these practices may fall under statutes of state and federal deceptive sales practices. These are unethical tactics designed to get a large investment from the prospects most guaranteed to be able to pay for your program and then not teach anything of validity, instead consistently trying to get students to purchase more and more at each event. Furthermore, your legal disclaimers do not provide you the leeway to utilize unfair and deceptive business practices at your gain and your students' peril--students who place their trust in you at a costly price. It is a highly irresponsible and unlawful on your part as well as extremely deceptive, and I have evidence from a former Trump University employee who could no longer work for your organization in good conscience. My final conclusion based on discussions with counsel is that there was a gargantuan amount of

misleading, fraudulent, and predatory behavior taking place that suggests legal cause for action.

Your failure to provide me usable knowledge has caused me irreparable consequential damages, and so I am due at minimum a refund on my program, totaling **\$34,995 plus the variable APR finance charges, interest fees, and late fees**. I am prepared to testify to the details of your teachings, the mentorship, and your basic business practices as well as fraud in court at the state and federal levels should your organization want to continue to claim responsibility for nothing. I imagine this could involve the Better Business Bureau; the Consumer Protection Division of each State and at a National Level; Department of Real Estate for each state you or any of your employees, mentors, or related parties have done related business in; New York County District Attorney's offices and any other state District Attorney's offices you have had seminars in; the any applicable State Attorney General and Senators; the United States Attorney General; the US House of Representatives; and the Federal Trade Commission; and the Department of Justice at the "highest level" with additional inquiries as to why you have been misleading students, as well as investigations into what other illegal business practices you may be engaging in outside of this program.

The aforementioned issues are just a portion of the business and personal damage to me and my corporations. The questionable tactics, promises to instruct tactics not kept, conflict of interest involvements, and other fraudulent and predatory business behavior and practices have resulted in many actionable issues from the totality of our business dealings. I am prepared to cooperate with state and federal agencies who I presume will want full disclosure concerning the nature of said civil case. In addition, Trump University representative emails spell out such a compelling case against your organization, that I am simply going to present my demand as it is a waste of my time to detail all of these issues and simply would be presented in discovery.

The complaint here is of deceptive business practices, illegal predatory high pressure closing tactics, demanding students raise credit limits and enroll for new credit cards for "real estate" transactions then coercing the students to pay for the **\$34,995 plus the variable APR finance charges, interest fees, and late fees** courses with the cards as the "course prices will go up or will not be offered in the future" and other hard closing tactics. These business practices are criminal in nature as they fall under the fraud statutes of all states and the federal government so the indemnification on any Trump documentation is null and void making the Mentors, Officers, Directors, Speakers, Sales People or any other persons associated with Trump University, Trump Institute or any other related person in any way, liable for both civil and criminal prosecution. Thus, as you knowingly participated in deceptive business practices as a Trump University representative, should Trump University chose to not refund my full **\$34,995 plus the variable APR finance charges, interest fees, and late fees** unscrupulously charged to my account, I will have no choice but to hold you legally responsible for this entire amount as you have participated in this civil and criminal action.

After further discussions with counsel, albeit the gross negligence on your part, they are advising me that I make an attempt to settle with your organization by obtaining a refund as previously mentioned so that we can go our separate ways. While I do not like this idea as your organization has clearly misled me, I am willing to make this concession, take the refund, absorb the costs associated with time lost working on my other businesses, and not further question your practices should I receive the **\$34,995 plus the variable APR finance charges, interest fees, and late fees refund mentioned.**

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This is the final communication I plan between myself and any Trump University representatives other than an arrangement for a **\$34,995 plus the variable APR finance charges, interest fees, and late fees** cashier's check to be Fed Exed to me immediately at 3334 East Coast Highway #423, Corona Del Mar, CA 92625. I refuse to waste another moment of my time being involved in your program. I expect this cashier's check to be delivered to me no later than **8am Friday September 18, 2009 Pacific Time** otherwise Trump University, and anyone else that can be held liable in a court of law will be served with my dispute and your company dealings made public. I will utilize my connections at Gibson, Dunn & Crutcher and or any other law firm to pursue this legal action. And, as is my right, I intend to utilize my public relations contacts to make your dealings and our legal proceedings known to key entities, including the media in New York, the surrounding areas as well as nationwide should you not comply with my request. This extensive media outreach will be limited to statements of fact, and at no point will I engage in libelous behavior. I intend on discussing with my counsel whether we can also distribute this information to the federal authorities that may have a vested interest in assessing the impact of such information in light of all of the recent real estate fraud.

I would not advise testing the extent I am willing to go to should you not comply with my demands fully and immediately. **Please confirm receipt of this letter at [tmakaeff@gmail.com](mailto:tmakaeff@gmail.com) within 24 hours and your plan to act accordingly.**

Sincerely,

Tarla Makaeff





September 16, 2009

Ms. Tarla Makaeff  
3334 E Coast Highway #423  
Corona Del Mar, California 92625

Dear Ms. Makaeff,

We are in receipt of your letter of September 10, 2009 and disagree with your characterizations of Trump University's actions, intent and efforts to provide you with a valuable and useful course of study.

You have been provided with every element of the programs that you purchased and have additionally been provided with additional, complimentary assistance. You have provided a series of evaluations and consistently rated our courses as "excellent" and you provided a videotaped testimonial. Your accusations that TU and its staff engaged in any wrong-doing, trickery, bad faith or malfeasance are unsupported by the facts and we will aggressively defend our actions in any forum, at any time.

We strongly disagree with your assertions that Trump University did not deliver services as promised. We not only provided you with the programs that you purchased, we also have given you additional services, at no additional cost, because we wanted to provide you with the education needed to have the best chance to succeed.

The Trump Gold Elite program that you purchased consisted of:

1. Three Day Field Mentorship, which you completed on September 28<sup>th</sup>, 2008
2. Wealth Preservation/Asset Protection Retreat, which you completed on October 26<sup>th</sup>, 2008
3. Quick Turn Real Estate Retreat, which you completed on February 8<sup>th</sup>, 2009.
4. Creative Financing Retreat, which you completed on November 2<sup>nd</sup>, 2008
5. Commercial & Multi-Family Retreat, which you completed on January 25<sup>th</sup>, 2009
6. Investor's Edge Real Estate Software, which you received on August 28<sup>th</sup>, 2009
7. Incorporate Your Business, which you utilized in June 2009

You have participated in every aspect of the Trump Gold Elite program and you have indicated your satisfaction each step along the way. The evaluations that you provided clearly show this:

1. After the Three day Field Mentorship Mentorship with Mr. Rick McNally, you provided a Field Mentor Evaluation Form that stated that you felt the overall experience was "amazing."
2. After the Creative Financing Retreat you stated: "That there was nothing that could be improved about this seminar" and that "the seminar was great." For each of these programs you rated them as "Excellent" and responded to all questions with the top rating possible.



3. On June 13, 2009, you voluntarily provided a taped video testimonial at our Wealth Summit and gave a positive testimonial endorsing Trump University and voicing your satisfaction with the programs that you had purchased and attended.

When you indicated that you were looking for additional help, Trump University (although not obligated to do so) provided the services of one of our coaches, Stephen Gilpin for four sessions which had a value of \$2,000; and you have stated that Mr. Gilpin was very helpful. You also had at least fifteen (15) conversations or email exchanges with Trump University mentor Tad Lignell who helped you find a power team in the Las Vegas area.

Further more, during your correspondence with Tad, you advised him that you were able to become involved with another TU student in a transaction that would result in profits of approximately \$20,000.

In April, in conversations with Paul Reisner and Brad Schneider, you requested a second mentorship which you were not entitled to receive. Again, Trump University wanted to assist you, although it was not obligated to do so, and another series of complimentary coaching sessions was set up with another Real Estate coach, Troy Peterson.

You had three sessions with Mr. Peterson (4/21/09, 5/12/09 and 6/30/09.) During those sessions, you reviewed methods of raising financing and Mr. Peterson showed you how to create a private money proposal. You actually met Mr. Peterson at a live event in June 2009 and then had a third coaching session with him. These three sessions with Mr. Peterson are valued at \$1,500.

We would also remind you that when you enrolled into our Trump Gold Elite program on August 10, 2008 you signed a contract that clearly stated that:

"This program was provided for information only and no guarantees, promises, representations or warranties of any kind regarding specific or general benefits, monetary or otherwise, has been or will be made by the Program, Program Instructors or Trump University."

You also signed a Terms and Conditions document that clearly states: "Trump University Programs are provided for training and educational purposes only." It also states that: "You acknowledge that Trump University has not made any express or implied representation or assurance regarding the potential profitability, chances of funding or likelihood of success of any transaction, investment, opportunity or strategy." Thus, any assertion that you were promised any level of financial return is without merit.

We vehemently disagree with your assertions about our sales process, customer service and course content. Your own evaluations and testimonial also prove otherwise. Even more troubling is the aggressive and almost abusive stance that you have taken with our coaches, mentors and students (even one who was working with you on a transaction from which you would have profited but who has



# TRUMP UNIVERSITY

decided to buy you out because of your demands, tone and threats.) We respectfully request that you stop such communications.

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We stand by our actions. Your threats and the like do not change the basic facts: you have been provided with the services that you purchased; you have been provided with additional complimentary services; and you have given positive evaluations and recorded statements.

We would prefer to part company amicably. However, we will take all steps necessary to protect our reputation and to make sure that your involvement with Trump University is portrayed accurately and truthfully.

Sincerely,

Jack Mahoney

Vice President of Customer Service  
Trump University

Dear Mr. Mahoney,

This letter is in response to your letter dated September 16, 2009. As the statements in your retort are quite selective, I am responding with a more accurate picture of the totality of our business dealings. I certainly am not precluded by the law from contacting you and can only wonder if your lack of addressing any of the legal issues I outlined can only be seen as an omission resulting in an admission. I am attempting to work this out with you and Trump University with a fair outcome resulting in a full refund of \$34,995 so we can go our separate ways.

The pattern of communication expressing my dissatisfaction started as early as August 12, 2008 and continued over the months as follows:

**Around August 12, 2008** (2 days after signing up) - A few days after I left this seminar, I didn't have a good feeling and I called Ms. Tiffany Brinkman regarding her promise of return on the \$34,995 and what I would learn on my mentorship, and her story immediately changed. Now, she said that she never promised anything and to read the fine print on the pink contract I signed. In fact, her constant emails showed her concern was undoubtedly more focused on collecting every last dollar of the \$34,995 rather than addressing my needs. I have all of these e-mails. This is a violation of my rights as a consumer in California where I can cancel a service agreement within three days as my concerns were valid and substantiated by California Legal Code where the contract was signed.

**On September 29, 2008** (1 day after my 3-day mentorship ended) - I spoke with Mr. Jason Schauer on the phone asking more questions because I didn't feel I received all of the knowledge I needed. In fact, there are teachings in the course which violate some California Codes. This is documented via e-mail.

**November 2, 2008 - November 10, 2008** (Last day after the *Creative Financing* retreat) - I expressed my gratitude to Tim Gorsline, the instructor of *Creative Financing*, as he had promised to help me since my mentors from the 3-day mentorship didn't as I complained to him. Then, after 1 week of exchanging emails with no useful information, which I have copies of, he disappeared. I have since found rip off reports of him on the Internet. It is also illegal to imply that consumers who purchase a service in California have a reasonable chance of recouping their investment plus future amounts. If the instruction includes practices considered illegal by the DRE and the California Legal Codes, it is impossible to use the program and a full refund is immediately due. In addition, the inclusion of instructors with questionable backgrounds brings further legal statutes into effect.

**Around November 7, 2008** (40 days after my 3-day mentorship and after trying to see if the *Wealth Preservation / Asset Protection* and *Creative Financing* retreats would help and they didn't clear up missing information from the mentorship with another \$5,000-\$10,000 package being pitched and Mr. Gorsline running out on his promise to help me) - I let Mr. Schauer from your corporate office know that I was dissatisfied with my mentorship and he arranged several phone calls with Stephen Gilpin which did not nearly cover all of the missing components of my mentorship such as the contracts. I have the few e-mails that were exchanged between 11/10 and 11/20 for the few phone calls we had.

000275

**April 3 -14, 2009** (After attending the *Commercial and Multi-Family* and *Quick Turn Real Estate* retreats with one instructor George Fuchs being rated so negatively by me and the entire class that another class was offered from Trump University by "popular demand" as well as the other instructor having had his own home foreclosed on and two bankruptcies thus not having the expertise to teach me how to flip homes, Mr. Paul Reisner called to ask about my satisfaction at which time I complained yet again) - To this end, I attempted to have Mr. Reisner also from your corporate office right the wrong by sending a different mentor to my home. I suggested Troy Peterson to which Mr. Reisner offered some calls but no additional in person help, and, who further told me that there were no other unhappy students which I know for a fact is a blatant lie. There is rampant dissatisfaction amongst your students at the seminar. But nonetheless, Mr. Reisner had to tell me that I wasn't working hard enough to make money, which apparently is a frequent line used from your staff according to online complaints, and something which could not be further from the truth. As some of the methods taught are illegal in the state of California and can be prosecuted as misdemeanors with jail time, does this mean I should have worked harder to possibly get jail time? Mr. Reisner did his best though to use reverse psychology and place all of the blame on me, someone who is educated and has earned 6 figures on her own in the past. Mr. Reisner very well knows it is virtually impossible to work out numbers and contracts via phone calls but despite my efforts to work with him and even speak to Mr. Brad Schneider further after sending him a lengthy email detailing all of my concerns, I was left with the phone calls and no ability at a refund, although I am very aware of students receiving new in person help or refunds. I am no less deserving of such assistance. I still, to this date, after a \$34,995 expenditure have little understanding of all of the contracts necessary to perform the more complex real estate deals, a very integral part to this business.

**On September 10, 2009** - I sent letters to your Trump University staff detailing the information above as my complaints were being ignored and inefficiently dealt with, and you sent back a 3-page letter dated September 16, 2009 telling me that I was satisfied through the whole program and thus you would not offer a refund at all. I believe my points above as well as my ongoing contact with Trump University expressing dissatisfaction show I was far from satisfied. But to address your points:

1. You stated that I rated my 3-day mentorship as "amazing" ...what you failed to acknowledge was that your mentors present you with the survey to rate them as they are sitting right next to you in your home so there is no privacy in filling these forms out. I was not about to express any dissatisfaction when two men were sitting with me, a woman, alone in my house. I felt my mentors were "amazing" people in their ability to be polite like used car salesmen, but nice doesn't give me the number crunching and contract help I needed to learn and was promised in your contracts. I did express my concern to Mr. Schauer just a day later on points that were not covered and critical knowledge that was sorely lacking as mentioned above.
2. You stated that I rated the *Creative Financing* retreat seminar as "great" and "there was nothing that could be improved." Again, you failed to mention that you are handing forms to the staff and not putting them in a box or anywhere that highlights anonymity making it very difficult to negatively rate instructors when your whole "education" could be affected by such ratings. In any case, I did believe at the time that the seminar was "great" because as I mentioned above, Mr. Gorsline, the instructor, promised to

help me with my education and some direct questions I had for him as I told him in emails which I have documented that I didn't receive the help I needed in my 3-day mentorship. Mr. Gorsline broke all promises and disappeared without ever helping me. So at this point I didn't think the seminar or the speaker were "great." It is illegal and unethical to have students fill out surveys in front of employees or consultants who will be further mentoring them. It is impossible to criticize the person you have paid for future service and expect to receive good service.

3. You stated that on June 13, 2009 I voluntarily taped a video testimonial at the *Wealth Summit* retreat and voiced my satisfaction with the programs. As you were not there I don't think you can attest to what happened. Like all of the other Trump University interactions I've had here again is ridiculous embellishment. I was standing at the end of the seminar waiting to walk out with another student when the interviewer and his camera man came in my face and turned on the camera light and started recording. I didn't seek them out or the camera nor did I volunteer. Once again, I was in need of more information and training as promised in the contract I now see as fraudulent so it is also inadmissible as taken under duress of having more information denied me as the pattern had developed. I had come for this weekend which as mentioned above was supposed to bring additional information to the California students but ended up being another prospecting event for a new herd of prospects who none of the current students had ever seen before. And instead of discussing techniques it was another pitch event with 4 speakers with products to sell each at \$495 - \$1,995. Of course, the main speaker Omar used more group-think conditioning/brainwashing where you have students do cheers and use tactics of making those feel shunned that do not go ahead with the herd. In any case, I did not feel it appropriate to bash Trump University on tape nor comfortable walking away when they were in my face so instead I said something to the effect of "it's very important to have a mentor to help you in any business" however I NEVER stated that I was happy with any of Trump University's services and only spoke in polite generalities. In any regard, Trump University's use of brainwashing is downright manipulative as everyone feels pumped when they leave the events only to later realize they have once again been let down.
4. You stated that I had 4 sessions with Mr. Gilpin each valued at \$2,000 which I stated were very helpful. I have a hard time believing a 1 hour conversation is worth \$2,000 and this statement is beyond ridiculous however, I thought Mr. Gilpin was the most helpful but clearly he could not cover what was missed in a 3-day mentorship through no fault of his own but the solution was to send my mentors or other mentors back out, not try to cover material that simply cannot be done via phone or email. Mr. Gilpin was only able to get to some number crunching but I still did not learn anything regarding contracts, which is the most critical component of any real estate deal!
5. You stated that I had 15 conversations or email exchanges with Tad Lignell, another Trump University mentor, who helped me find a power team in Las Vegas consisting of a realtor. And you further stated that I told Mr. Lignell I was able to be involved in a transaction with another student that would result in profits of approximately \$20,000. What you are leaving out is that the \$20,000 would be first divided so it would be \$10,000 if your statement was correct, but it is not. The power team I was introduced to misquoted comps to me (by email) which is their job to do correctly, and they misquoted by \$15,000 at the time from \$99,000 to what was really \$85,000 and

quickly sunk to about a \$60,000 comp value in a few months meaning I would have taken a 20% LOSS on the transaction. The Trump University statement is a blatant lie and further evidence of fraudulent business practices. This is a gargantuan error as in such a low priced property; \$15,000 can make the difference between profiting or not profiting. In addition, for the claim that I was to make \$20,000 on the transaction when I would have lost 20% of my investment had I not been able to exit the deal early due to statutes regarding the incorrect comp and fraud at the escrow office as the firm had two different documents signed with my partner, Mr. Lignell's protégé, changing the document without my signature—highly illegal and further evidence of teaching of fraudulent tactics by Trump University Mentors and Employees. When I discovered this I complained to Mr. Lignell which I have documented emails of but he conveniently left out. I found this out after the property closed and have been left with an investment I have been trying to exit as the current comps state it is now worth not even \$85,000 but \$60,000 as compared to the house sold in the neighborhood with same lot size, sq. footage and condition, not \$99,000. The student additionally who they coupled me with lied about his investment in the property, further rendering the deal in the red. He also discussed personal legal matters with Mr. Lignell who attempted to cover up the fraud by claiming to have a buyer. This is also against the law violating my personal financial information as I have included federal and state laws regarding furthering Trump University's culpability in more matters violating the law.

6. You stated that I had 3 sessions with Mr. Peterson; another mentor, who showed me how to raise financing and who presented me with a private money proposal. You also claimed that Mr. Peterson gave me my third coaching session at the *Wealth Summit* retreat valued at \$1,500. These are blatant lies. I asked Mr. Peterson but he never showed me how to raise capital from investors which was one of my ongoing primary questions that NONE of the mentors ever answered. Additionally, Mr. Peterson never presented me with a private money proposal...I received this from another student. At the event, yes I asked one question of Mr. Peterson and spoke to him for 5 minutes so your claim is outrageous. I didn't realize a 5 minute conversation where Mr. Peterson brushes you off to talk to another student who can do something for him politically is valued at \$1,500.
7. You further reminded me that from the date I signed the contract on August 10, 2008 no guarantees were made nor any benefits promised. This is a very easy way out for an institution that makes grandiose promises in person, doesn't deliver, and then points to legal disclaimers. When deceptive business practices and fraudulent and misleading tactics are being used, such disclaimers become null and void. I have included the California Code and the DRE law that regulates illegal activity taught in the course that covers the nation and California. It would be impossible to make money unless one was to break the law so the contract is null and void allowing the only remedy for a full refund immediately. Obviously I agreed to pay \$34,995 for something and any company that has countless complaints online at rip off reports among others with students discussing class action definitely has some issues that need to be resolved rather than brushed under the rug. I find this especially troubling when you stated that "Trump University programs are provided for training and educational purposes only." Yes, this is what I have been asking for all along. I am not asking Trump University to



do deals for me or make financial promises but instead promise to teach me thoroughly, correctly, and ethically as they promised from day one!

8. You lastly claimed that Mr. Lignell has decided to buy me out of the Las Vegas property due to my demands. Either you or Mr. Lignell in this case are lying, as Mr. Lignell claimed he was going to try to find another buyer for me but never mentioned that he was the buyer. It is against the law to discuss a private transaction outside of this property contract and without my consent as it involves my personal financial information and this is protected by both Federal and State provisions making Trump University culpable to their affiliate's violations. However, it should be noted that Mr. Lignell's power team is the one that got me into this property which was a financial loss from the beginning therefore it is not the heroic act that you claim to "rescue" me. These predatory acts are just that and there is nothing redeeming about them.
9. The fact that you, despite all my complaints and the time I have spent documenting my dissatisfaction and breaches of federal and state law, claimed that you stand by your organization's actions that I am satisfied is unconscionable. You obviously have chosen to leave out everything and anything negative that I have expressed and as my complaints have fallen on deaf ears and this is an atrocity, and I refuse to be swept under the rug or not receive a fair and satisfactory solution so that I can be made whole from this disturbing and time-wasting experience.

In summation, I went ABOVE AND BEYOND in requesting help and every time I got more of the same nonsense...inefficient teaching of information with very broad strokes making the "education" unusable and more assertions that I would never receive any kind of refund. You are insinuating that your organization does not want to offer a refund because the "education" was consumed by me. This is null and void as Trump University teaches illegal Real Estate practices I have included as evidence. In fact, when days after signing the paperwork I expressed concern to Ms. Brinkman I was told no promises were made to me (a blatant lie) and at that point it was evident a refund couldn't be obtained, thus your argument has no validity. Once the paperwork is signed, Trump University makes it nearly impossible to get any kind of a refund, irrespective of whether a student is satisfied or not. I truly hope you understand I will not stop pursuing my refund as I am now truly aware of the nature and practices of Trump University. This gravely concerns me for the legal safety of ALL the other students that have been educated by Trump University in California and nationwide as they could face jail time.

I am standing by the same opinion I first expressed last fall and continued to express through my interaction with Trump University which clearly denotes a pattern of dissatisfaction not properly remedied. As you state you would prefer to part company amicably, I am giving you the courtesy of a last opportunity to resolve this matter by mailing me a total \$34,995 refund in the form of a cashier's check payable to my personal name immediately.

TARLA MAKAEFF  
3334 East Coast Highway, Suite 423  
Corona Del Mar, CA 92625

Sincerely,

  
Tarla Makaeff



Record # 6 / Consumer Sentinel Network Complaints			
Reference Number: 24133478		Originator Reference Number:	
Language: English		Contact Type: Complaint	
Source: Consumer		DNC? N	
<p><b>Comments:</b> Prosper Inc. / Trump Institute and its representatives agreed to provide me with a real estate training mentorship to create a real estate investing business that could earn, according to their representatives, up to tens of thousands of dollars monthly income and potentially much more. My enrollment was based around my need to learn every legal facet of real estate investing designed to create a new income stream for me. This was based on the fact that I had no real estate investing background or knowledge of how to navigate this business due to my purely creative background, which all of the Prosper Inc. / Trump Institute representatives were made aware of. Since the beginning of their \$9,495 program, I have concluded that Prosper Inc. / Trump Institute representatives misled me consistently, and did not provide what I signed up for. I have come to the additional conclusion that neurolinguistic programming and high pressure sales tactics based on the psychology of scarcity are used by their representatives to get observers to become participants in their program. This included direct enrollment by their staff with an HSBC/Prosper Learning credit limit for supposed real estate transactions but truly to purchase their program as well as having their staff review interviewees' financial status during the interview call to assess their investment capabilities, for the Prosper Inc. / Trump Institute program, of course. These are unethical tactics designed to get a large investment from the prospects and then not teach anything of validity. Furthermore, their legal disclaimers do not provide them the leeway to utilize unfair and deceptive business practices at their gain and their students' peril--students who place their trust in them at a costly price. It is a highly irresponsible and unlawful on their part as well as extremely deceptive. My final conclusion based on discussions with counsel is that there was a gargantuan amount of misleading, fraudulent, and predatory behavior taking place that suggests legal cause for action. Because of the fact that they comingled the opening of a credit line with HSBC, Prosper Inc., and Trump Institute with high pressure sales tactics, fraudulent claims, gathering of financial information without considering whether or not students could pay back their lines of credit, THEIR LEGAL DISCLAIMER IS NULL AND VOID as this violates state and federal criminal statutes in many ways.</p>			
Was the complaint resolved?:		Complaint Resolution:	
Data Reference:			
Entered By: FTCCIS-FTCUSER		Entry Date: 9/26/2009	
Updated By:		Updated Date:	
Complaint Source: FTC Online Complaint Assistant (CIS)		Product Service Code: Business Opportunities/Work-At-Home Plans	
Amount Requested: \$9,495.00		Amount Paid: \$9,495.00	
Payment Method: Other Credit Card		Agency Contact: Internet	
Complaint Date: 9/26/2009		Transaction Date: 9/30/2008	
Initial Contact: Initiated Contact		Initial Response: Internet/E-mail	
Statute/Rule: FTC Act Sec 5 (BCP)		Law Violation: Deception/Misrepresentation	
Topic:		Dispute with Credit Bureau?: N	
Dispute with Credit Bureau - Responded?:		Dispute with Credit Bureau - Resolved to Satisfaction?:	
Member of armed forces or dependent?:			
Consumer Information			
Consumer			
Complaining Company/Org:			
First Name: Tarla		Last Name: Makaeff	
Address 1: 3334 E Coast Hwy #423		Address 2:	
City: Corona Del Mar		State: California	
Zip: 92625		Country: UNITED STATES	
Home Number: 949-3878430		Work Number: 949-3878430	

<b>Fax Number:</b>		<b>Ext:</b>	
<b>Email:</b> tmakaeff@gmail.com		<b>Age Range:</b> 30 - 39	
<b>Military Service Branch:</b>		<b>Soldier Status:</b>	
<b>Soldier Station:</b>			
<b>Subject</b>			
<b>Subject:</b> Prosper Inc./trump Institute/trump University Coaching			
<b>Address:</b> 5072 North 300 West			
<b>City:</b> Provo	<b>State/Prov:</b> Utah		
<b>ZIP:</b> 84604	<b>Country:</b> United States		
<b>Email:</b> support@prospering.com	<b>URL:</b> http://www.prospering.com/		
<b>Area Code:</b> 800	<b>Phone Number:</b> 7485199		
<b>Ext:</b>	<b>Subject ID Type:</b>		
<b>Subject ID Issuer State:</b>	<b>Subject ID Issuer Country:</b>		
<b>Representative Name:</b> Justin Kramer	<b>Title:</b> Executive Director		

# **Exhibit L24**



Better Business Bureau  
Serving Metropolitan New York, Long Island, and the Mid-Hudson Region

30 East 33rd Street  
New York, NY 10016  
(212) 533-6200  
FAX  
www.newyork.bbb.org

**Case #:** 9461396

**Consumer Info:** marmontel, laure  
247 sw 8th st #113  
Miami, FL 33130  
8082232012  
lauremarmontel@hotmail.com

**Business Info:** The Trump Entrepreneur Initiative  
40 Wall Street, 32nd Floor  
New York, NY 10005  
(212) 810-7358

**Date Filed:** 3/13/2013

**Nature of the Complaint:** Service Issues

**Consumer's Original Complaint:**

We paid more than \$40,000 for some real estate education and a one-year mentorship. Several months into the mentorship program, our mentor/coach stopped getting in touch with us.

We later learned that he stopped calling and e-mailing because Trump University was not paying him like they were supposed to.

Also the information taught by some individuals at those seminars was questionable from a legal standpoint and even questionable from a moral standpoint.

Many services that they performed were not at all to the level of what they advertised.

One of the easiest example is a \$3000 "bus tour" was sold promising professionals of all of the real estate trades would be with us in the bus, when we in fact ended up with one single high-end residential broker who had no clue of what we were trying to achieve, i.e. buy distressed properties to rehab them. A total waste of time and money, when they actually also spent one full day pitching us other Trump products.

We called the office and sent Trump University a letter via FedEx to request reimbursement.

After several calls to the office, we were told that our letter had gone to their legal department and that we would hear back from them shortly.

To this day, we have not heard back from anyone, and now all of the phone numbers that we have are disconnected.

We cannot let \$40,000 of our hard earned money go down the drain to some unscrupulous entity without wanting justice be done.

if you desire, I could forward you a copy of the letter we sent to Trump University originally.

Looking forward to hearing back from you,  
we thank you very much for the good services the BBB provides to the people.

000283

**Consumer's Desired Resolution:**

We would like the full amount we paid reimbursed, plus our credit card interest paid since the date of the charges.

**Business/Consumer Response & Rebuttals:**

03/27/2013

Mark Covais

Respond to Complaint

To Whom It May Concern,

Trump Initiative's ultimate goal is to provide our students with the tools needed for success. We have reviewed Ms. Marmontel's complaint requesting a refund. Based on the terms of the contract (please see attached) that Ms. Marmontel signed on 5/2/10 she is not eligible for a refund; it states that "You, the Buyer, may cancel this agreement without any penalty, at any time prior to midnight of the third business day after the date of this transaction." In addition to the terms of Ms. Marmontel's contract upon review of her account we found nothing to substantiate or justify a refund.

All the correspondences we have logged in Ms. Marmontel's account prior to her one year contract expiring indicate that she was happy with her program, mentor, and the support she was receiving. In regards to the bus tour Ms. Marmontel's used as an example in her complaint, Paul Reisner, a Program Director at the time updated Ms. Marmontel's account on 06/28/2010 at 12:40pm writing; "She called in today because she went on the bus tour this past weekend and wanted to tell me that it was great." I have also submitted (please see attached) a copy of the evaluation form Ms. Marmontel provided to us after her 3 Day In-Field Mentorship were she gives high marks and very favorable feedback of her experience.

As part of our commitment to customer satisfaction and in an attempt to resolve this matter we recently contacted Ms. Marmontel to discuss her complaint. As a gesture of good will and in the hopes of bringing this issue to a close we offered to reactivate Ms. Marmontel account so she could download and enjoy the virtual versions of our live Real Investors Blueprint Workshop and four Advanced Retreats. We are awaiting her response.

Best Regards

Mark Covais

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000285

# Exhibit L25



STATE OF NEW YORK  
 OFFICE OF THE ATTORNEY GENERAL  
 BUREAU OF CONSUMER FRAUDS AND PROTECTION  
 120 Broadway, 3rd Floor  
 New York, NY 10271-0332  
 Tel. (212) 416-8345 Fax (212) 416-8787

**COMPLAINT FORM**

Consumer Hotline For Hearing Impaired  
 (800) 771-7777 TDD (800) 788-9898  
 CONSUMER FRAUDS & PROTECTION BUREAU  
 http://www.dave.ny.us  
 DEC 01 2009  
 NYS OFFICE OF THE ATTORNEY GENERAL  
 NEW YORK CITY OFFICE

- PLEASE BE SURE TO COMPLAIN TO THE COMPANY OR INDIVIDUAL BEFORE FILING.
- PLEASE TYPE OR PRINT CLEARLY IN DARK INK.
- YOU MUST COMPLETE THE ENTIRE FORM. INCOMPLETE OR UNCLEAR FORMS WILL BE RETURNED TO YOU.
- MAKE SURE YOU ENCLOSE COPIES OF IMPORTANT PAPERS CONCERNING YOUR TRANSACTION.

<b>CONSUMER</b>		
YOUR NAME <i>Carmen Mendez</i>		HOME TELEPHONE NUMBER <i>718-677-5856</i>
STREET ADDRESS <i>2297 Utica Ave</i>		BUSINESS TELEPHONE NUMBER
CITY/TOWN <i>Brooklyn, NY</i>	COUNTY <i>11234</i>	STATE ZIP
<b>COMPLAINT</b>		
NAME OF SELLER OR PROVIDER OF SERVICES <i>Trump University</i>		NAME OF OTHER SELLER OR PROVIDER OF SERVICES
STREET ADDRESS <i>40 Wall Street, 32nd Floor</i>		STREET ADDRESS
CITY/TOWN <i>New York</i>	STATE <i>NY</i>	ZIP <i>10005</i>
TELEPHONE NUMBER <i>1-888-826-5953</i>		TELEPHONE NUMBER
DATE OF TRANSACTION <i>6/14/09</i>	COST OF PRODUCT OR SERVICE <i>\$ 36,590.00</i>	HOW PAID (Check those which apply) <input type="checkbox"/> Cash <input type="checkbox"/> Check <input type="checkbox"/> Credit Card <input type="checkbox"/> Other
DID YOU SIGN A CONTRACT? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	WHERE DID YOU SIGN THE CONTRACT? <i>New York</i>	DATE SIGNED <i>6/14/09</i>
WAS PRODUCT OR SERVICE ADVERTISED? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	WHERE WAS IT ADVERTISED? <i>Mail</i>	DATE ADVERTISED <i>5/09</i>
TYPE OF COMPLAINT (e.g. car, mail order, etc. Use the reverse side of this form to provide details)		
DATE YOU COMPLAINED TO THE COMPANY OR INDIVIDUAL <input type="checkbox"/> By Mail <input checked="" type="checkbox"/> By Telephone <input type="checkbox"/> In Person	PERSON CONTACTED <i>Jason</i>	JOB TITLE <i>supervisor</i>
NATURE OF RESPONSE <i>No time set up for my instruction.</i>		DATE OF RESPONSE
HAS MATTER BEEN SUBMITTED TO ANOTHER AGENCY OR ATTORNEY? (If "Yes," give name and address) <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
IS COURT ACTION PENDING? (Please describe as necessary) <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
<b>ADDITIONAL INFORMATION</b>		
MANUFACTURER OF PRODUCT <i>Real Estate</i>		PRODUCT MODEL OR SERIAL NUMBER
ADDRESS		WARRANTY EXPIRATION DATE
DID BUSINESS ARRANGE FINANCING? (If "Yes," give name and address of bank or finance company) <input type="checkbox"/> Yes <input type="checkbox"/> No		

PLEASE DESCRIBE COMPLAINT ON REVERSE SIDE



BRIEFLY DESCRIBE YOUR COMPLAINT: When I went to the seminar, I asked Jennifer and another gentleman if I was going to receive financial assistance to purchase the houses and they told me yes. I signed with the assumption that they were telling me the truth. However, I contacted them again, they said that they won't lend me the money to buy any homes. All they have been doing is giving me the same information they offered in the seminar. Because the name of Mr. Donald Trump was referred in the seminar, I thought this was a real University that would provide counseling for the students who were confused. Thank you!!

WHAT FORM OF RELIEF ARE YOU SEEKING? (e.g., exchange, repair or money back, etc.) I want my money back.

WHO REFERRED YOU TO THIS OFFICE? I looked at your campaign website and they referred me to your office.

READ THE FOLLOWING BEFORE SIGNING BELOW

PLEASE ATTACH TO THIS FORM PHOTOCOPIES of any papers involved (contracts, warranties, bills received, canceled checks, correspondence, etc.). DO NOT SEND ORIGINALS.

NOTE: In order to resolve your complaint, we may send a copy of this form to the person or firm about whom you are complaining.

In filing this complaint, I understand that the Attorney General is not my private attorney, but represents the public in enforcing laws designed to protect the public from misleading or unlawful business practices. I also understand that if I have any questions concerning my legal rights or responsibilities, I should contact a private attorney. I have no objection to the contents of this complaint being forwarded to the business or person the complaint is directed against. The above complaint is true and accurate to the best of my knowledge.

I also understand that any false statements made in this complaint are punishable as a Class A Misdemeanor under Section 175.30 and/or Section 210.45 of the Penal Law.

Signature: Carmen Ruiz

Date: 10/15/09

HAVE YOU ENCLOSED COPIES OF IMPORTANT PAPERS?

Return to: Office of the Attorney General  
Bureau of Consumer Frauds and Protection  
120 Broadway, 3rd Floor  
New York, NY 10271-0332

Carmen Mendez  
2297 Utica Avenue  
Brooklyn, NY 11234

BBB of Metropolitan New York  
257 Park Avenue South 4<sup>th</sup> Floor  
New York, NY 10010-7384

October 4, 2009

To Whom It May Concern:

I am writing because I want people to be aware that Trump University is not a real educational institution. Since Trump University address is in your state (257 Park Ave. 4<sup>th</sup> Floor, NY, NY 10010), I am forwarding my complaint to your office.


Due to the fact that Mr. Donald Trump is a very respectable person, I thought that Trump University was real institution and I registered to take a real estate course that cost me \$1,495.00 + 34,995.00. When I asked the University's employees if they guarantee financial assistance to purchase real estate, they answer yes. After their confirmation, they told me that they do not have a payment plan and that if I wanted to start making money with Trump University I had to act now because it was a terrific offer and I going to get rich with Trump University. I told them that I did not have that much money advised me to put it in my credit cards. I gave the credit cards and they charged \$5,000.00, 10,000.00, and 19,995.00 to three different credit cards.

When I found some good properties, I called the University to find out how I can get the financial assistance to buy the properties. They told me that they do not guarantee any financial assistance. I went to a broker and he told me that because I owe so much money to the credit cards, I won't be eligible for a regular loan; because the banks will consider me at risk and ineligible for a regular loan.

I have been calling Trump University, but the only they are doing is giving me the same information I received during the course. In addition, when I asked for Mr. Trump's phone number they said that they do not know his phone number. They also advised me not to talk to anybody because other people are pessimistic and won't help me get rich.

My complaint is that Trump University is not giving me proper counseling to solve the problem. I think they are just using a famous name to steal poor people's money. Please advise other people so they do not loose their savings in these difficult days. They go all over the country to steal other people's money. I you have any questions, please feel free to contact me: e-mail, [c\\_mendez09@verizon.net](mailto:c_mendez09@verizon.net), phone, 347-866-3580. Thank you in advance for your assistance.

Sincerely,



Carmen Mendez  
2297 Utica Avenue  
Brooklyn, NY 11234

October 15, 2009

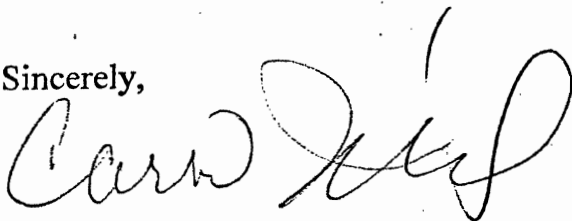
Andrew Cuomo  
Office of the Attorney General  
120 Broadway  
New York, NY 10271-0332

Dear Mr. Cuomo:

I am writing because I want an investigation concerning Trump University. After I registered for a real estate course in the university, I asked for counseling but it was denied to me. I have been in contact with some employees of the university but they always repeat the same thing. I tried to communicate with Mr. Trump but the employees told me that they did not know his phone number. I feel that I was misinformed when I signed documents for Trump University. In addition, I paid \$36,590.00 for the course with the promise that I will definitely get my money back. I was undecided but they convinced me that I would get my money back. In addition, they checked and analyzed my income and told me that I make little money and that if I wanted to improve my financial situation, I must charge the course to my credit cards. They even split the payment to three different credit cards.

Also, I believe that there thousands of people like me, who trusted a familiar and famous name and end up losing their life savings. On behalf of all people who have lost their money, I will appreciate a proper investigation. Thank you in advance for your assistance.

Sincerely,

A handwritten signature in black ink, appearing to read 'Carmen Mendez', written in a cursive style.

Carmen Mendez

Mail Completed Form To:

New York State Education Department  
 Bureau of Proprietary School Supervision  
 Investigations and Audit Unit  
 116 West 32<sup>nd</sup> Street, 5<sup>th</sup> Floor  
 New York, NY 10001

**RECEIVED**  
 NEW YORK CITY OF NEW YORK State Education Department  
 Bureau of Proprietary School Supervision  
**MAY 7 2010**  
 Telephone Number: (212) 643-4760  
 E-mail: BPSS@MAIL.NYSED.GOV  
 Web: www.highered.nysed.gov/bpss  
 BUREAU OF PROPRIETARY SCHOOL SUPERVISION

**Complaint Form**

**For Office Use Only**

Case Number	Nature of Complaint Code	Institution Code
1000101	12151301	8000000250689

Please use this form to record all information about your complaint. An investigator will be assigned to examine the situation and will, if necessary, contact you for additional information. The results of the investigation will be communicated to you in writing. You should be aware that in order to properly evaluate your complaint and assess your records, your name must be revealed to the school at some point during our review. If you wish, the office will strive to keep your complaint anonymous during the initial stages of the investigation. If you are requesting this limited anonymity, please check this box.

**Please print or type all information.**

1. Name Mr. <input checked="" type="radio"/> Ms. (please circle) <u>Carmen Méndez</u>		
2. Street Address & Apt. <u>2297 Utica Ave</u>		
City <u>Brooklyn, NY</u>	State	Zip Code <u>11234</u>
3. Telephone Number (include area code) _____ Day _____ Evening _____		
4. Social Security Number (of Student) if no SSN, Alien Reg. # <u>583-62-0109</u>	5. Date of Birth (of Student) <u>12/12/1951</u>	6. Date of Alleged Incident _____
7. Your E-Mail Address <u>C-mendez09@verizon.net</u>		
8. Name of the school which your complaint concerns <u>Trump University</u>		
9. Address and telephone number of the school <u>160 Greentree Drive, Suite 101, Dover, Delaware 19904</u>		
10. Did you attempt to utilize the school's internal complaint resolution procedures? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If no, why not? _____		
11. How did you hear of the school? <input type="checkbox"/> Newspaper <input type="checkbox"/> Television/Radio <input checked="" type="checkbox"/> Other <u>Invitation</u>		
12. Check the box which describes your status with the school: <input checked="" type="checkbox"/> Student <input type="checkbox"/> Family Member of Student <input type="checkbox"/> Employee of School <input type="checkbox"/> Other _____		
13. If you are not the student, please enter the name of student _____		
14. If a student: Are you still at this institution? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
If no, please check box which applies: <input type="checkbox"/> Graduated <input checked="" type="checkbox"/> Terminated <input type="checkbox"/> Withrew _____ Date _____		
If employee of school, please check the box which applies: <input type="checkbox"/> Currently Employed _____ Hiring Date _____ <input type="checkbox"/> Former Employee _____ Resignation/Termination Date _____		
15. Name of program: _____	16. Date program began: _____	

17. Total Cost of Program		18. Expected Graduation Date	
19. Was a student loan obtained?		<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
If yes, with what bank or financial institution?		Amount of loan: \$	
20. Have you paid any money directly to the school?		<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
If yes, how much? _____			
21. Was a Pell Grant obtained?		<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
		Amount: \$	Year(s)?
22. Was a TAP Grant obtained?		<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
		Amount: \$	Year(s)?
23. Are you in default of a loan?		<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
If yes, what date were you notified? _____		Amount owed: \$	Year(s)?
24. What result would satisfy you? <i>refund</i>			
25. Please provide a brief explanation of your complaint. Attach additional pages if necessary and copies of all relevant documents. <i>I was denied counseling from the institution.</i>			

I hereby acknowledge that by signing this complaint form I am giving the Commissioner of Education or his representatives authority to review and secure any and all of my student records in order to appropriately review and resolve this complaint. I am also authorizing the Commissioner to request a refund on my behalf if the department determines that a violation occurred which warrants a refund.

I also acknowledge that by signing this complaint form I am giving the Commissioner of Education or his representatives authority to release my social security number and date of birth to government agencies and lenders or loan guarantors associated with this complaint, if the Commissioner of Education or his representatives deem it necessary to resolve the complaint.

If you do not agree to have your social security number and date of birth released, please check the box below. Your complaint will still be processed and investigated even if you do not presently agree to the release of your social security number and date of birth. You may be requested at a future time to permit us to release your social security number and date of birth.

*Carl King*  
\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

# Exhibit L26



Better Business Bureau  
Serving Metropolitan New York, Long Island, and the Mid-Hudson Region  
30 East 33rd Street  
New York, NY 10016  
(212) 533-6200  
FAX  
www.newyork.bbb.org

**Case #:** 8362750

**Consumer Info:** merriam, Walter  
24001 muirlands #400  
LAKE FOREST, CA 92630  
7609087759  
bonniesonshine@gmail.com

**Business Info:** The Trump Entrepreneur Initiative  
40 Wall Street 32nd Floor  
New York, NY 10005  
-

**Date Filed:** 10/5/2010

**Nature of the Complaint:** Service Issues

**Consumer's Original Complaint:**

My husband and I attended a Trump University Seminar in May of 2010. It is now called Trump Entrepreneur Initiative. We paid 1500 to attend the Seminar on how to invest in Real Estate. At the end of the Seminar we were told that we could receive more training and if we signed a contract and paid 10,000 that day, we would have access to the 4 experts that did the training. But we would have to sign up and pay the day of training. The trainers (experts) were Steve Libman, Christy, Dave, and Lotto. We didn't receive the last names of the last 3 people. For the three months (June, July, and August) my husband, Walt, has made many calls to Trump to receive answers to questions and assistance in working on his business of Real Estate Investment. Often people don't return his calls and when they do they say well that person, Lotto, who made the verbal promises doesn't work for Trump anymore. He never gets to talk to any of the experts or same experts. They cashed the 10,000 and gave very poor or no service. Absolutely NO one on one assistance. I wouldn't recommend this company to anyone. We didn't have 10,000 to lose, therefore, I am very disappointed in Trump.

**Consumer's Desired Resolution:**

We are requesting our 10,000 back or at least 1/2 of it. We actually lost 11,500 plus a lot of time and effort

**Business/Consumer Response & Rebuttals:**

11/16/2010  
April Neumann

Response to Complaint

Normal  
0

false  
false  
false

EN-US  
X-NONE  
X-NONE

MicrosoftInternetExplorer4

16 November, 2010

Ms. Rita  
Plate

Better  
Business Bureau

30 East 33rd  
Street

New York, NY  
10016

Dear Ms.  
Rita Plate:

I am writing  
to inform you that Mr. Walter Merriam and The Trump Entrepreneur Initiative are  
working together to come to an agreement in correspondence with Mr. Merriam's filed  
complaint (case #8362750). Mr. Merriam is  
actively working with our Program Director to find a mentor to best fit his  
needs as indicated by attached correspondence dated November 15, 2010. The  
Trump Entrepreneur Initiative is waiting on a confirmed response from Mr.



Merriam so that scheduled services may be resumed immediately.

Thank you,

April  
Neumann

Director of  
Operations

---

# Exhibit L26

**CUSTOMER EXPERIENCE INFORMATION  
(ID# 8606058)**

**The Trump Entrepreneur Initiative**

**Customer Information:**

Deneen Moore  
240 West 65th Street Apt# 16 B  
New York , NY .1002

Daytime Phone: 973-652-6570

E-mail: [DeeCeeMoore@Hotmail.com](mailto:DeeCeeMoore@Hotmail.com)

**The details of this matter are as follows:**

**Complaint Involves:**

Advertising Issues

**Customer's Statement of the Problem:**

I feel the Donald Trump school scammed good and honest people in believing the school would help them in the Real Estate business. For my \$35,000+ all I got was books that I could have gotten from the library that could guide me better then Trump's class did. I just want my \$35,000+ money back. I feel embarrass and very dumb for falling for Donald Trump so call real estate classes.

**Complaint Background:**

**Product/Service:**

**Purchase Date:** 12/11/2009

**Problem Occurred:** 3/15/2010

**Talked to Company:** 5/9/2010

# **Exhibit L28**

<b>Record # 16 / Consumer Sentinel Network Complaints</b>	
<b>Reference Number:</b> 19601615	<b>Originator Reference Number:</b>
<b>Language:</b> English	<b>Contact Type:</b> Complaint
<b>Source:</b>	<b>DNC?</b> N
<b>Comments:</b> Consumer says she paid 1500 for a Real Estate class. Consumer says they also paid 20 thousand dollars for a coach plus 30 extra dollars. Consumer says he has not called or contacted her in over a month. Consumer says the coach did nothing. Consumer says she was to get other classes. Consumer says they only offered them another mentor not there money back. Consumer says she found out the mentors was sub contractors and scammers. Consumer says she did not get a two year program so she could learn everything about the real estate business.	
<b>Was the complaint resolved?:</b>	<b>Complaint Resolution:</b>
<b>Data Reference:</b>	
<b>Entered By:</b> dhall	<b>Entry Date:</b> 7/21/2008
<b>Updated By:</b>	<b>Updated Date:</b>
<b>Complaint Source:</b> FTC Call Center	<b>Product Service Code:</b> Real Estate (not Timeshares)
<b>Amount Requested:</b>	<b>Amount Paid:</b>
<b>Payment Method:</b>	<b>Agency Contact:</b> Phone
<b>Complaint Date:</b> 7/21/2008	<b>Transaction Date:</b>
<b>Initial Contact:</b>	<b>Initial Response:</b>
<b>Statute/Rule:</b> FTC Act Sec 5 (BCP)	<b>Law Violation:</b> Deception/Misrepresentation
<b>Topic:</b>	<b>Dispute with Credit Bureau?:</b> N
<b>Dispute with Credit Bureau - Responded?:</b>	<b>Dispute with Credit Bureau - Resolved to Satisfaction?:</b>
<b>Member of armed forces or dependent?:</b>	
<b>Consumer Information</b>	
<b>Consumer</b>	
<b>Complaining Company/Org:</b>	
<b>First Name:</b> BETSY	<b>Last Name:</b> NORTAN
<b>Address 1:</b> 3415 SHAW RD	<b>Address 2:</b>
<b>City:</b>	<b>State:</b> Georgia
<b>Zip:</b> 30066	<b>Country:</b> UNITED STATES
<b>Home Number:</b> 678-9107918	<b>Work Number:</b>
<b>Fax Number:</b>	<b>Ext:</b>
<b>Email:</b>	<b>Age Range:</b> 20 - 29
<b>Military Service Branch:</b>	<b>Soldier Status:</b>
<b>Soldier Station:</b>	
<b>Subject</b>	
<b>Subject:</b> Trump University	
<b>Address:</b>	
<b>City:</b>	<b>State/Prov:</b>
<b>ZIP:</b>	<b>Country:</b>
<b>Email:</b>	<b>URL:</b>
<b>Area Code:</b> 877	<b>Phone Number:</b> 5087867
<b>Ext:</b>	<b>Subject ID Type:</b>

<b>Subject ID</b>		<b>Subject ID</b>	
<b>Issuer State:</b>		<b>Issuer Country:</b>	
<b>Representative Name:</b>	BRAD SNYDER	<b>Title:</b>	REP

# **Exhibit L29**

NOTICE OF CANCELLATION

Date: 08/26/08

YOU MAY CANCEL THIS TRANSACTION, WITHOUT ANY PENALTY OR OBLIGATION WITHIN THREE BUSINESS DAYS FROM THE ABOVE DATE.

IF YOU CANCEL, ANY PROPERTY TRADED IN, ANY PAYMENTS MADE BY YOU UNDER THE CONTRACT OF SALE, AND ANY NEGOTIABLE INSTRUMENT EXECUTED BY YOU WILL BE RETURNED WITHIN TEN BUSINESS DAYS FOLLOWING RECEIPT BY THE MERCHANT OF YOUR CANCELLATION NOTICE, AND ANY SECURITY INTEREST ARISING OUT OF THE TRANSACTION WILL BE CANCELLED.

IF YOU CANCEL, YOU MUST MAKE AVAILABLE TO THE MERCHANT AT YOUR RESIDENCE, IN SUBSTANTIALLY AS GOOD CONDITION AS WHEN RECEIVED, ANY GOODS DELIVERED TO YOU UNDER THIS CONTRACT OR SALE; OR YOU MAY IF YOU WISH COMPLY WITH THE INSTRUCTIONS OF THE MERCHANT REGARDING THE RETURN SHIPMENT OF THE GOODS AT THE MERCHANT'S EXPENSE AND RISK.

IF YOU DO NOT AGREE TO RETURN THE GOODS TO THE MERCHANT, OR IF THE MERCHANT DOES NOT PICK THEM UP WITHIN TWENTY DAYS OF THE DATE OF YOUR NOTICE OF CANCELLATION, YOU MAY RETAIN OR DISPOSE OF THE GOODS WITHOUT ANY FURTHER OBLIGATION.

TO CANCEL THIS TRANSACTION, MAIL OR DELIVER A SIGNED AND DATED COPY OF THIS CANCELLATION NOTICE OR ANY OTHER WRITTEN NOTICE, OR SEND A TELEGRAM, TO 08/29/08 TRUMP U. 40 WALL STREET, NEW YORK, NY 10005 NOT LATER THAN MIDNIGHT OF 08/29/08. OR FAX 212-937-3830.

I HEREBY CANCEL THIS TRANSACTION.

DATE: 8/27/08

[Signature]  
Buyer's Signature  
Print Name: EMIL NUSSBAUM  
Address: 100 WALL ST NY 10005  
Telephone: 212 512 5574

*A. NEUMANN REC'D*  
*JOHNNIE + notice of cancellation*  
*8/27/08*  
*A. Neumann*  
*212.248.1800*



BRIEFLY DESCRIBE YOUR COMPLAINT

8/26/2008

Purchased 3 day training (copy of contract enclosed) to be conducted at the Holiday Inn (Colonie N.Y.) Dates 9/5/2008 thru 9/7/2008

8/27/2008

Faxed cancellation (copy of transmission receipt enclosed)

Sent copy by express mail (copy of receipt enclosed)

Went to site of free seminar- at the Holiday Inn Schenectady NY – Returned CD Packet and received receipt from A. Neumann (copy enclosed) who said “ I will enter it in the computer on Tuesday “ (9/2/2008)

As of 9/11/2008 we have not had a credit issued to our credit card. Calling the customer service line simply put us into a voice mail, which is never returned.

Cancellation is as required by contract was followed in all possible ways (Included in the faxed and mailed cancellation was a notarized request showing the date).

WHAT FORM OF RELIEF ARE YOU SEEKING? (e.g., exchange, repair or money back, etc.)

REFUND AS PER CONTRACT ENCLOSED

WHO REFERRED YOU TO THIS OFFICE?

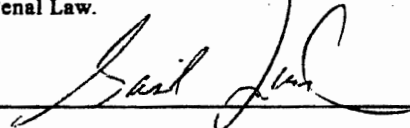
READ THE FOLLOWING BEFORE SIGNING BELOW

PLEASE ATTACH TO THIS FORM PHOTOCOPIES of any papers involved (contracts, warranties, bills received, canceled checks, correspondence, etc.). DO NOT SEND ORIGINALS.

NOTE: In order to resolve your complaint, we may send a copy of this form to the person or firm about whom you are complaining.

In filing this complaint, I understand that the Attorney General is not my private attorney, but represents the public in enforcing laws designed to protect the public from misleading or unlawful business practices. I also understand that if I have any questions concerning my legal rights or responsibilities, I should contact a private attorney. I have no objection to the contents of this complaint being forwarded to the business or person the complaint is directed against. The above complaint is true and accurate to the best of my knowledge.

I also understand that any false statements made in this complaint are punishable as a Class A Misdemeanor under Section 175.30 and/or Section 210.45 of the Penal Law.

Signature: 

Date: 9/11/08

HAVE YOU ENCLOSED COPIES OF IMPORTANT PAPERS?

Return to: Office of the Attorney General  
Bureau of Consumer Frauds and Protection  
120 Broadway, 3rd Floor  
New York, NY 10271-0332

# **Exhibit L30**



Better Business Bureau  
Serving Metropolitan New York, Long Island, and the Mid-Hudson Region

30 East 33rd Street  
New York, NY 10016  
(212) 533-6200  
FAX  
www.newyork.bbb.org

**Case #:** 8358147

**Consumer Info:** Page, Bettye  
900 Andover Green  
LEXINGTON, KY 40509  
8593968763  
bettyepage@yahoo.com

**Business Info:** The Trump Entrepreneur Initiative  
40 Wall Street 32nd Floor  
New York, NY 10005  
8888265953

**Date Filed:** 9/29/2010

**Nature of the Complaint:** Refund / Exchange Issues

**Consumer's Original Complaint:**

I purchased the Trump Elite Real Estate Program on April 11, 2010 for the price of \$34,995. The program director assigned to me was Paul Reisner, he called me on April 14 introducing himself and briefly discussing the online training, he also said he would set up a 3-way call within the next two days with Johnny Horton my mentor. By May 12 no call, nor had I been introduced to my mentor. I started reaching out to persons I had met when I joined the program, Denise Ong and Steve Libman and got no response to my emails. May 25 at 11:00AM I had a scheduled appointment with Paul to discuss issues I had with the website and online training. I called 4 times on May 25 between 10:58 and 11:42, left messages and he never returned call. May 27, I called customer service to request a refund. On May 28-Johnny and Paul called apologizing that he let my info fall through the cracks. June 3-Paul called on behalf on his supervisor Gilliam Burney, ultimately his fault, he said. June 6-I faxed request for a full refund. On June 28, Michael Sexton, CEO, said they failed to deliver the level of service they committed to and that some people are no longer with Trump because of the way this was dealt with. My comment to him was that I want to be financially where I was before I attended the workshop, full refund of \$34,995. I continually explained that too much irresponsibility and lack of commitment had already occurred with several people. I had not been dealt with fairly, and the breach of contract has left me dissatisfied and lacking trust in the program. Conversation ended with Michael saying he would give the money back (\$34,995) but the process may take awhile since it was paid by check (2 checks) the worse case would be 30 days. I have not received an email. I have not received my refund.

**Consumer's Desired Resolution:**

Full refund of \$34,995.

000306

**Business/Consumer Response & Rebuttals:**

**11/16/2010**

**April B. Neumann**

Respond to Complaint

Attached is The Trump Entrepreneur Initiative's response to your complaint.

---

**11/18/2010**

**Ms. Bettye Page**

I accept the business's response to this complaint.

Better Business Bureau:

I have reviewed the response made by the business in reference to complaint ID 8358147, and find that this resolution is satisfactory to me and the matter has been resolved.

Sincerely,

Bettye Page

From: Bettye Page [mailto:bettyepage@yahoo.com]

Sent: Thursday, November 18, 2010 12:54 PM

To: Complaints

Subject: Re: You have a new message from the New York BBB. Complaint # 8358147

No further contact needed, thank you.

---

000307

# **Exhibit L31**



Better Business Bureau  
Serving Metropolitan New York, Long Island, and the Mid-Hudson Region

30 East 33rd Street  
New York, NY 10016  
(212) 533-6200  
FAX  
www.newyork.bbb.org

**Case #:** 815456

**Consumer Info:** Patel, Devang  
5441 N East River Rd  
Chicago , IL 60656  
6306983674  
dvangstr@hotmail.com

**Business Info:** The Trump Entrepreneur Initiative  
40 Wall Street, 32nd Floor  
New York, NY 10005  
(212) 810-7358

<http://www.trumpinitiative.com>

**Date Filed:** 8/15/2008

**Nature of the Complaint:** Refund / Exchange Issues

**Consumer's Original Complaint:**

Consumer states: My wife and I were contacted by Trump University for there Real Estate Investor Training Program. We discussed this and told them we were interested in this and were charged by credit card. They told us about a coaching program and we told them we would think about it but we did not want it at that time. A few months later, they charged us in the amount of \$1500 in January and February of 2008 for a total of \$3000. They were able to do this because they had our credit card number on file. We were in the process of disputing the first charge by trying to call them when we were charged again in February. We even had to get our credit card company involved but they were not able to help us. Eventually, we were able to get in touch with them since they would not answer our messages. They kept using stall tactics by asking us to send proof of contacting them or trying to dispute the charge. They would say they never got the fax or they couldn't read the fax. They even went as far as giving us the name of Trump Institute when we conference called with an agent of our credit card, American Express. Trump Institute was completely separate and they didn't even have us on file. Then, a member of Trump University, Paul Reisner, would make claims that since he didn't know of all of this happening since January, it probably wasn't 'truly disputed'. He asked us to fax documents so that he could authorize a reimbursement. When we did, he said he talk with his manager, Brad Schneider, and could not authorize it.

**Consumer's Desired Resolution:**

000309

**Business/Consumer Response & Rebuttals:**



# **Exhibit L32**



Consumer Protection Complaint Form

Tom Miller  
Consumer Protection Division  
Attorney General of Iowa  
Hoover State Office Building  
1300 E. Walnut, Des Moines, Iowa 50319  
515-281-5926  
E-mail: consumer@ag.state.ia.us

12 FEB 27 7 01 AM '12  
RECEIVED  
Received by  
CONSUMER FRAUDS & PROTECTION BU  
APR 17 2012  
NYS OFFICE OF THE ATTORNEY GENERAL  
NEW YORK CITY OFFICE

Instructions. To help us handle your complaint:

- 1. Please print or type. Answer all questions fully and correctly.
- 2. Include photocopies of any documents that may relate to your complaint claim (contracts, advertisements, correspondence, proof of payment, etc.)
- 3. Return the information to the Consumer Protection Division (address above)

PLEASE NOTE IMPORTANT OPEN RECORDS INFORMATION ON THE SECOND PAGE OF THIS FORM.

YOUR NAME AND ADDRESS:

Name Louis F. Piatti

\* Address 714 E. NORTH ST. PO BOX 733

City MONROE State IA Zip 50170

Home Phone Number 641-259-3242

Work Phone Number 515-222-0422

Your Age 73

NAME OF BUSINESS OR PERSON THE COMPLAINT IS AGAINST:

Name TRUMP UNIVERSITY (TRUMP ORGANIZATION)

Address 925 FIFTH AVE.

City NEW YORK State NY Zip 10022

\* FORMERLY 2910 W. FIRST ST.  
ANN ARBOR, IA. 50023

Phone Number NOT KNOWN Fax Number NOT KNOWN

For motor vehicle complaints, list the Vehicle Identification# (VIN) \_\_\_\_\_

Product or service involved: HOW TO ACQUIRE, REPAIR + SELL DISTRESSED PROPERTY FOR PROFIT  
Product new or used? REAL ESTATE (DISTRESSED PROPERTY)

Date of purchase or contract: OCT. 08 APPROX

Amount of purchase or contract: \$12,700

Actual amount paid: \$12,700

How did you pay? (check, credit card, etc.): CREDIT CARD

Have you contacted the business or person?  No \_\_\_\_\_ Yes

Please explain in the summary

Have you contacted an attorney?  No \_\_\_\_\_ Yes

When: \_\_\_\_\_

Name of attorney contacted: \_\_\_\_\_

What do you think should be done to resolve your complaint fairly? REFUND

ALL OR MOST OF THE FEES TO MORE NEARLY REFLECT THE VALUE OF SERVICES RENDERED.

Summary of Your Complaint. Please download this complaint form and return by mail to the above address. Please print or type. Use additional paper if necessary

I PAID OVER \$12,000 FOR A 2 OR 3 DAY LECTURE BY PROMOTERS USING TRUMP'S NAME. THEY SOLD A LOT OF BLUESKY<sup>AND</sup> EMPTY PROMISES OF MENTORS WHO MAY BE AVAILABLE ONLY FOR HUGE FEES. IN SHORT, THE PROGRAM ULTIMATELY SMACKED OF MODERN HUCKSTERING AND FAILED TO DELIVER WHAT I THOUGHT I WAS GETTING. I AM DISTRESSED THAT I ALLOWED MYSELF TO BE "SOLD".

IN THE TIME SINCE THE SEMINAR I HAVE ATTEMPTED TO MAKE THEIR SYSTEM WORK, BUT COULDN'T BRING MYSELF TO USE THEIR METHODS, WHICH WHILE NOT ILLEGAL, WERE UNETHICAL AND DISHONEST.

000313

I understand that the Attorney General's Office is not my private attorney but represents the public in enforcing laws designed to protect consumers from misleading or unlawful business practices. I also understand I may contact a private attorney for legal advice.

Please sign here.

Signature *Ann H. Smith* Date 2-25-12

Note: Complaints are Open Records Under Iowa law, complaint forms or letters are "open records." The public has the right to review or obtain copies of open records. Also, copies of complaints are routinely sent to the person or business the complaint is directed against.

Please call or write the Consumer Protection Division if you have questions about the open records law.

December 10, 2011

Trump Organization  
725 Fifth Ave.  
New York, NY 10022

RE: Trump University

To Whom It May Concern:

I have very little hope that this letter will make it to Mr. Trump's desk and attention, but I want him to see it nevertheless.

In the spring of 2009, I attended a preview seminar to promote Trump University's course on real estate investing in Des Moines, IA.

I was impressed with what I saw and decided to continue with the program as I wanted to become involved in real estate purchasing, rehabbing and sales.

I sat in on the presentation and subsequently purchased the program for approximately \$12,000.00, (equivalent to approximately one year's tuition at Iowa State University) using my credit card plus a fee of approximately \$35.00 a month for a year.

I have experienced empty promises, promotions of "blue sky" and phantom mentors while the whole thing smacks of modern day hucksters & promoters pertaining to the persons who put the program on and little help from Trump University staff.

I believe that Mr. Trump lent his name to a program that failed to deliver and did very little to help anyone invest in real estate in an ethical and honest manner while doing nothing to help students find the proper type of financing needed to do this business, instead promoting very risky and questionable business practices.

Therefore, I ask that you refund the majority of my investment. In my opinion, what I learned from Trump University amounted to a value of less than ten percent of what I paid for the course.

Sincerely,

Louis F. Piatt  
714 E North St.  
PO Box 733  
Monroe, IA 50170  
E mail address:  
Phone# 515-669-4891

000315

# **Exhibit L33**

Edmund G. Brown Jr.  
Attorney General

State of California  
Office of the Attorney General  
Department of Justice

Return form to:  
Public Inquiry Unit  
P.O. Box 944255  
Sacramento, CA 94244-2550  
FAX: (916) 323-5341

### Company Response Form

**Trump University**

Complaint ID Number: 321754

Staff: C. Ruelas

Name of consumer: Mr. Tim Picking

Legal name of company:

Trump University

Executive office address:

40 Wall Street 32<sup>nd</sup> Fl NY NY 10005

Contact person:

Steve Matejek

Telephone number:

646-810-7346

Response to complaint:

(Please enter response below or attach this form to your response.)

See attached Letter.

Thank you for your assistance.

A copy of this reply will be sent to the consumer.

TRUMP 00117800

000317

EDMUND G. BROWN JR.  
Attorney General

State of California  
DEPARTMENT OF JUSTICE



PUBLIC INQUIRY UNIT  
P.O. BOX 944255  
SACRAMENTO, CA 94244-2550  
(916) 322-3360  
TOLL FREE: (800) 952-5225  
TTY: CA Relay Service  
(800) 735-2922

April 5, 2010

PIU: 321754

Trump University  
40 Wall Street, 32nd floor  
New York, NY 10005

**CORRESPONDENCE RECEIVED FROM:**

Mr. Tim Picking  
8537 Larimar Court  
Antelope, CA 95843

The Consumer Law Section of the Attorney General's Office has received the enclosed complaint relating to your firm. We understand that there are always two sides to a problem, and we would appreciate your prompt review of this matter.

You should be aware that we do not directly represent the consumer in this instance. However, we analyze all complaints to determine whether grounds exist for further investigation or legal action under California consumer protection laws. Your response to each of the factual allegations in the complaint will help us determine whether legal action on our part is warranted.

We would appreciate receiving your response within the next 30 days. Please include the attached Company Response Form with your answer to this office. Also, please send a copy of your response to the consumer if appropriate. Please feel free to attach any documents you think are relevant in explaining your position. Naturally, in sending you this complaint, we make no assumption as to the truth of the allegations, but do appreciate your prompt response to our inquiry.

Thank you for your cooperation and assistance in responding to this matter.

Sincerely,

A handwritten signature in cursive script, appearing to read "C. Ruelas".

C. Ruelas  
Public Inquiry Unit

For EDMUND G. BROWN JR.  
Attorney General

Enclosure

TRUMP 00117801

000318

**From:** "pickingtim@yahoo.com" <pickingtim@yahoo.com>  
**To:** "pluwebform@doj.ca.gov" <pluwebform@doj.ca.gov>  
**Date:** 12/7/2009 10:06 AM  
**Subject:** [Web Form] Consumer complaint against business or company

Below is the result of the feedback form.  
It was submitted by pickingtim@yahoo.com

=====  
NEW\_TYPE:  
=====

TYPE: CL  
First Name: Tim  
Middle Initial:  
Last Name: Picking  
Address Line: 8537 Larimar Court  
Address Line 2:  
City: Antelope  
State: CA  
Zip: 95843  
Zip4:  
Area Code: 916  
Phone Number: 7262861  
Company Name: Trump U  
Company Address Line: 40 Wall Street  
Company Address Line 2:  
Company City: New York  
Company State: NY  
Company Zip: 10005  
Company Zip4:  
Company Area Code: 888  
Company Phone Number: 8265953

Comment Or Question Message: I am disputing a contract occurring on 11/21/2009 of \$25,490 because of misrepresentation from the sales staff at Trump University. I was told and advised that purchasing the 3 day mentorship will include accomplish results if I follow their plan. The promise was that results are to be backed by a guarantee from Trump University that if I do not close my first sale of property I will receive a full refund. After intense pressure, I was promised this guarantee. Moreover, I was led to believe that since this is a service I would be refunded in full as long as I cancel before service is performed. This is how to get around the 3 day recession and give me more time to think about it. Moreover, I was advised not to console my spouse since she may have negative ideas which would impede success. Upon believing this to be true, I relented. Later, I discovered otherwise. I was told several times by the office at Trump University that they will not honor any refund. Moreover, the mentorship is a service that I have not received and will refuse on the grounds of that kind misrepresentation. The sales tactics used were deceitful and extremely dishonest. Thank you for your consideration.

Affirm Information Accurate: Yes  
Send This Complaint: Yes  
Request Copy: Yes  
Email: pickingtim@yahoo.com  
Confirm Email: pickingtim@yahoo.com



December 6, 2009

To whom it may Concern:

I am disputing this contract occurring on 11/21/2009 of \$25,490 because of misrepresentation from the sales staff at Trump University. I was told and advised that purchasing the 3 day mentorship will include guaranteed results if I follow their plan. The promise was that results are to be backed by a guarantee from Trump University that if I do not close my first sale of property I will receive a full refund. After intense pressure, I was promised this guarantee. Moreover, I was led to believe that since this is a service I would be refunded in full as long as I cancel before service is performed. This is how to get around the 3 day recession and give me more time to think about it. Moreover, I was advised not to console my spouse since she may have negative ideas which would impede success. Upon believing this to be true, I relented. Later, I discovered otherwise. I was told several times by the office at Trump University that they will not honor any refund. Moreover, the mentorship is a service that I have not received and will refuse on the grounds of that kind misrepresentation. The sales tactics used were deceitful and extremely dishonest. Therefore I am disputing this charge as I have with my credit card company. Moreover, be advised that my next step is to contact the Better Business Bureau, the state's regulatory agency and the attorney general if this issue is not resolved. If you wish to contact me, call me at 916-726-2861. Thank you for your consideration.

Yours truly



Tim Pickling

Student ID 1027954

December 6, 2009

To whom it may Concern:

I am disputing this contract occurring on 11/21/2009 of \$25,490 because of misrepresentation from the sales staff at Trump University. I was told and advised that purchasing the 3 day mentorship will include guaranteed results if I follow their plan. The promise was that results are to be backed by a guarantee from Trump University that if I do not close my first sale of property I will receive a full refund. After intense pressure, I was promised this guarantee. Moreover, I was led to believe that since this is a service I would be refunded in full as long as I cancel before service is performed. This is how to get around the 3 day recession and give me more time to think about it. Moreover, I was advised not to consol my spouse since she may have negative ideas which would impede success. Upon believing this to be true, I relented. Later, I discovered otherwise. I was told several times by the office at Trump University that they will not honor any refund. Moreover, the mentorship is a service that I have not received and will refuse on the grounds of that kind misrepresentation. The sales tactics used were deceltful and extremely dishonest. Therefore I am disputing this charge as I have with my credit card company. Moreover, be advised that my next step is to contact the Better Business Bureau, the state's regulatory agency and the attorney general if this issue is not resolved. If you wish to contact me, call me at 916-726-2861. Thank you for your consideration.

Yours truly



Tim Picking

Student ID 1027954

# Exhibit L34



Better Business Bureau  
Serving Metropolitan New York, Long Island, and the Mid-Hudson Region

30 East 33rd Street  
New York, NY 10016  
(212) 533-6200  
FAX  
www.newyork.bbb.org

**Case #:** 8016366

**Consumer Info:** Raymond, William  
4516 Harwood Rd  
COLORADO SPRINGS, CO 80906  
7194594443  
billyr32@netzero.net

**Business Info:** Trump University  
40 Wall Street 32nd Floor  
New York, NY 10005  
-

**Date Filed:** 10/25/2009

**Nature of the Complaint:** Refund / Exchange Issues

**Consumer's Original Complaint:**

In Aug, 2009 Trump University was holding a free one day seminar in Colorado Springs at the Double Tree Hotel. For 90 minutes the guy said I would get detailed in depth instructions on Short Sales, for sale by owners, distressed property's and abandoned property's. We would get a jump start with investors and private money along with a personal coach that will assist us in the real estate projects. We were told we would get NAMES AND NUMBERS of private investor's and private money guys. the first day all they did was talk about tomorrows educational information. Five hours of nothing We got home and called to cancel but the answering service said VOICEMAIL IS FULL PLEASE TRY YOUR CALL AGAIN LATER! Both us knowing we had been taken with our start up money I spent on this. No choice we had to go because the voicemail still said Voicemail is full please try again later. Saturday was a bigger let down we had been hoodwinked they were selling programs for \$34,000. which promised the same things we were promised at the seminar in co/spr for the workshop in denver and NO ONE HAS YET TO COMPLY with promises and guarantee's . I called my credit card company and they would refund my money if I obtained the refund from Trump... But they wont refund it I am now living in Denver had to rent out my house and THEY TOOK MY 1400 AND I WANT IT BACK!!! I filed a report with the AGO and FCIC

**Consumer's Desired Resolution:**

\$1400. I had to move to Denver my paper work on this company is in storage. If someone could call me I could get them the information they needed to recover my money. I no longer have good credit on my credit card due to this circumstance.

000323

**Business/Consumer Response & Rebuttals:**

<b>Record # 5 / Consumer Sentinel Network Complaints</b>			
<b>Reference Number:</b> 24413321			<b>Originator Reference Number:</b>
<b>Language:</b> English	<b>Contact Type:</b> Complaint		
<b>Source:</b> Consumer	<b>DNC?</b> N		
<b>Comments:</b>	In Aug,09 Trump University was holding a free one day seminar in Co Spr at the Double Tree Hotel. 90 minutes the guy said by going to the workshop in Denver we would get detailed in depth instructions on Short Sales, fsbo, distr prprty's, aband prop, and frclsrs. A coach for a whole year. Free access to all information at TU for one year, NAMES AND NUMBERS of private investor's regardless of credit. the 1st day money back Gurnt, 1st day all they did was talk about tomorrows educational information. We got home and called to cancel but the answering service said VOICEMAIL IS FULL PLEASE TRY YOUR CALL AGAIN LATER! Not knowing I would get a refund I returned to the workshop the following day. because the voicemail still said Voicemail is full please try again later. Saturday was a bigger let down we had been hoodwinked they were selling programs for \$34,000. which promised the exact same things we were promised at the seminar in co/spr for the workshop in denver for the \$1400 and NO ONE HAS YET TO COMPLY with promises and guarantee's . I called my credit card company and they would refund my money if I obtained the refund ticket from Trump... But they wont refuse I am now filing a complaint...		
<b>Was the complaint resolved?:</b>			<b>Complaint Resolution:</b>
<b>Data Reference:</b>			
<b>Entered By:</b> FTCCIS-FTCUSER	<b>Entry Date:</b> 10/25/2009		
<b>Updated By:</b>	<b>Updated Date:</b>		
<b>Complaint Source:</b> FTC Online Complaint Assistant (CIS)	<b>Product Service Code:</b> Employ Agencies\Job Counsel\Overseas Work		
<b>Amount Requested:</b> \$1,400.00	<b>Amount Paid:</b> \$1,400.00		
<b>Payment Method:</b> Visa Credit Card	<b>Agency Contact:</b> Internet		
<b>Complaint Date:</b> 10/25/2009	<b>Transaction Date:</b> 7/29/2009		
<b>Initial Contact:</b> In Person	<b>Initial Response:</b> Phone: 800/888 number		
<b>Statute/Rule:</b> FTC Act Sec 5 (BCP)	<b>Law Violation:</b> Deception/Misrepresentation		
<b>Topic:</b>	<b>Dispute with Credit Bureau?:</b> N		
<b>Dispute with Credit Bureau - Responded?:</b>	<b>Dispute with Credit Bureau - Resolved to Satisfaction?:</b>		
<b>Member of armed forces or dependent?:</b>			
<b>Consumer Information</b>			
<b>Consumer</b>			
<b>Complaining Company/Org:</b>			
<b>First Name:</b> William	<b>Last Name:</b> Raymond		
<b>Address 1:</b> 4516 Harwood Rd	<b>Address 2:</b>		
<b>City:</b> Colorado Springs	<b>State:</b> Colorado		
<b>Zip:</b> 80916	<b>Country:</b> UNITED STATES		
<b>Home Number:</b> 719-4594443	<b>Work Number:</b> 719-4594443		
<b>Fax Number:</b>	<b>Ext:</b>		
<b>Email:</b> billyr32@netzero.net	<b>Age Range:</b> 40 - 49		
<b>Military Service Branch:</b>	<b>Soldier Status:</b>		
<b>Soldier Station:</b>			
<b>Subject</b>			
<b>Subject:</b> Trump University			
<b>Address:</b> 40 Wall Street			
<b>City:</b> New York		<b>State/Prov:</b> New York	

<b>ZIP:</b> 10005	<b>Country:</b> United States
<b>Email:</b>	<b>URL:</b> www.trumpuniversity.com
<b>Area Code:</b> 888	<b>Phone Number:</b> 6687867
<b>Ext:</b>	<b>Subject ID</b>
<b>Subject ID</b>	<b>Type:</b>
<b>Issuer State:</b>	<b>Subject ID</b>
<b>Representative ??</b>	<b>Issuer Country:</b>
<b>Name:</b>	<b>Title:</b> customer service?

# Exhibit L35



<b>Record # 3 / Consumer Sentinel Network Complaints</b>			
<b>Reference Number:</b>	27697876	<b>Originator Reference Number:</b>	
<b>Language:</b>	English	<b>Contact Type:</b>	Complaint
<b>Source:</b>		<b>DNC?</b>	N
<b>Comments:</b>	Consumer paid Trump University for a seminar and a mentor through them. He never recieved help from them. The seminar was about real estate. UPDATE 09.17.2010 Consumer called back to provide more company info. NLITTLE		
<b>Was the complaint resolved?:</b>		<b>Complaint Resolution:</b>	
<b>Data Reference:</b>			
<b>Entered By:</b>	NLITTLE	<b>Entry Date:</b>	9/17/2010
<b>Updated By:</b>	NLITTLE	<b>Updated Date:</b>	9/17/2010
<b>Complaint Source:</b>	FTC Call Center	<b>Product Service Code:</b>	Real Estate (not Timeshares)
<b>Amount Requested:</b>	\$19,000.00	<b>Amount Paid:</b>	\$19,000.00
<b>Payment Method:</b>	Check (Not Classified)	<b>Agency Contact:</b>	Phone
<b>Complaint Date:</b>	9/17/2010	<b>Transaction Date:</b>	2/1/2010
<b>Initial Contact:</b>	Mail	<b>Initial Response:</b>	Phone: other
<b>Statute/Rule:</b>	FTC Act Sec 5 (BCP)	<b>Law Violation:</b>	Deception/Misrepresentation
<b>Topic:</b>		<b>Dispute with Credit Bureau?:</b>	
<b>Dispute with Credit Bureau - Responded?:</b>	N	<b>Dispute with Credit Bureau - Resolved to Satisfaction?:</b>	N
<b>Member of armed forces or dependent?:</b>			
<b>Consumer Information</b>			
<b>Consumer</b>			
<b>Complaining Company/Org:</b>			
<b>First Name:</b>	Michael	<b>Last Name:</b>	Real
<b>Address 1:</b>	Po Box 3872	<b>Address 2:</b>	
<b>City:</b>	Orange	<b>State:</b>	California
<b>Zip:</b>	92857	<b>Country:</b>	UNITED STATES
<b>Home Number:</b>	714-8514929	<b>Work Number:</b>	657-2017325
<b>Fax Number:</b>		<b>Ext:</b>	
<b>Email:</b>	michaelreal@gmail.com	<b>Age Range:</b>	50 - 59
<b>Military Service Branch:</b>		<b>Soldier Status:</b>	
<b>Soldier Station:</b>			
<b>Subject</b>			
<b>Subject:</b>	Trump University/trump Initiative		
<b>Address:</b>			
<b>City:</b>		<b>State/Prov:</b>	
<b>ZIP:</b>		<b>Country:</b>	
<b>Email:</b>	gmartin8@cfl.rr.com	<b>URL:</b>	trumpuniversity.com
<b>Area Code:</b>	321	<b>Phone Number:</b>	3770125
<b>Ext:</b>		<b>Subject ID Type:</b>	
<b>Subject ID Issuer State:</b>		<b>Subject ID Issuer Country:</b>	

**Representative** Christy Duckett  
**Name:** Gerald Martin

**Title:**

# Exhibit L36



ATTORNEY GENERAL ANDREW M. CUOMO  
 STATE OF NEW YORK  
 OFFICE OF THE ATTORNEY GENERAL  
 BUREAU OF CONSUMER FRAUDS AND PROTECTION  
 120 Broadway, 3rd Floor  
 New York, NY 10271-0332  
 Tel. (212) 416-8345 Fax (212) 416-8787

**COMPLAINT FORM**

Consumer Hotline For Hearing Impaired  
 (800) 771-7755 TDD (800) 788-9898

Consumer Protection Bureau  
 JUN 21 2010  
 NYS OFFICE OF THE ATTORNEY GENERAL  
 CONSUMER PROTECTION BUREAU

1. PLEASE BE SURE TO COMPLAIN TO THE COMPANY OR INDIVIDUAL BEFORE FILING.
2. PLEASE TYPE OR PRINT CLEARLY IN DARK INK.
3. YOU MUST COMPLETE THE ENTIRE FORM. INCOMPLETE OR UNCLEAR FORMS WILL BE RETURNED TO YOU.
4. MAKE SURE YOU ENCLOSE COPIES OF IMPORTANT PAPERS CONCERNING YOUR TRANSACTION.

<b>CONSUMER</b>		
YOUR NAME <i>Daniel Rivera</i>		HOME TELEPHONE NUMBER <i>718 877 6142</i>
STREET ADDRESS <i>3a Montauk Place</i>		BUSINESS TELEPHONE NUMBER
CITY/TOWN <i>Staten Island</i>	COUNTY <i>Richmond</i>	STATE <i>N.Y.</i> ZIP <i>10314</i>
<b>COMPLAINT</b>		
NAME OF SELLER OR PROVIDER OF SERVICES <i>Trump University</i>		NAME OF OTHER SELLER OR PROVIDER OF SERVICES
STREET ADDRESS <i>Wall Street</i>		STREET ADDRESS
CITY/TOWN <i>NY</i>	STATE <i>NY</i>	ZIP <i>10005</i>
TELEPHONE NUMBER <i>212 248 1800</i>		TELEPHONE NUMBER
DATE OF TRANSACTION <i>1/26/10</i>	COST OF PRODUCT OR SERVICE <i>\$995</i>	HOW PAID (Check those which apply) <input type="checkbox"/> Cash <input type="checkbox"/> Check <input type="checkbox"/> Credit Card <input type="checkbox"/> Other
DID YOU SIGN A CONTRACT? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	WHERE DID YOU SIGN THE CONTRACT? <i>Free Seminar in a Hotel in U.S.</i>	DATE SIGNED <i>1/26/10</i>
WAS PRODUCT OR SERVICE ADVERTISED? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	WHERE WAS IT ADVERTISED? <i>Staten Island Aduma.</i>	DATE ADVERTISED <i>1/24/10.</i>
TYPE OF COMPLAINT (e.g. car, mail order, etc. Use the reverse side of this form to provide details) <i>Real Estate class given by Trump University</i>		
DATE YOU COMPLAINED TO THE COMPANY OR INDIVIDUAL <i>2/18/10</i>	PERSON CONTACTED	JOB TITLE <i>Customer Service</i>
NATURE OF RESPONSE <i>They claim they would call me back.</i>		DATE OF RESPONSE <i>N/A</i>
HAS MATTER BEEN SUBMITTED TO ANOTHER AGENCY OR ATTORNEY? (If "Yes," give name and address) <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
IS COURT ACTION PENDING? (Please describe as necessary) <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
<b>ADDITIONAL INFORMATION</b>		
MANUFACTURER OF PRODUCT		PRODUCT MODEL OR SERIAL NUMBER
ADDRESS		WARRANTY EXPIRATION DATE
DID BUSINESS ARRANGE FINANCING? (If "Yes," give name and address of bank or finance company) <input type="checkbox"/> Yes <input type="checkbox"/> No		

PLEASE DESCRIBE COMPLAINT ON REVERSE SIDE

BRIEFLY DESCRIBE YOUR COMPLAINT

I paid \$1,000 to learn about real estate. instead I spent a weekend <sup>with</sup> ~~on~~ then trying to sell me a motor and more clothes for \$35,000. I've been trying to get my money back unsuccessfully.

Thank you

WHAT FORM OF RELIEF ARE YOU SEEKING? (e.g., exchange, repair or money back, etc.)

My money back

WHO REFERRED YOU TO THIS OFFICE?

DA. Donovans office

READ THE FOLLOWING BEFORE SIGNING BELOW

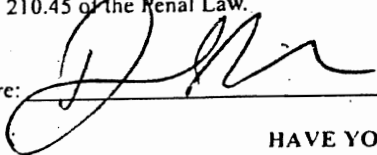
PLEASE ATTACH TO THIS FORM PHOTOCOPIES of any papers involved (contracts, warranties, bills received, canceled checks, correspondence, etc.). DO NOT SEND ORIGINALS.

NOTE: In order to resolve your complaint, we may send a copy of this form to the person or firm about whom you are complaining.

In filing this complaint, I understand that the Attorney General is not my private attorney, but represents the public in enforcing laws designed to protect the public from misleading or unlawful business practices. I also understand that if I have any questions concerning my legal rights or responsibilities, I should contact a private attorney. I have no objection to the contents of this complaint being forwarded to the business or person the complaint is directed against. The above complaint is true and accurate to the best of my knowledge.

I also understand that any false statements made in this complaint are punishable as a Class A Misdemeanor under Section 175.30 and/or Section 210.45 of the Penal Law.

Signature:



Date:

6/15/10

HAVE YOU ENCLOSED COPIES OF IMPORTANT PAPERS?

Return to: Office of the Attorney General  
Bureau of Consumer Frauds and Protection  
120 Broadway, 3rd Floor  
New York, NY 10271-0332

**RECEIVED**  
NEW YORK CITY OFFICE  
  
AUG 9 2010  
BUREAU OF  
PROPRIETARY SCHOOL  
SUPERVISION

# Complaint Form

Mail Completed Form To:

New York State Education Department  
Bureau of Proprietary School Supervision  
Investigations and Audit Unit  
116 West 32<sup>nd</sup> Street, 5<sup>th</sup> Floor  
New York, NY 10001

New York State Education Department  
Bureau of Proprietary School Supervision  
Telephone Number: (212) 643-4760  
E-mail: BPSS@MAIL.NYSED.GOV  
Web: www.highered.nysed.gov/bpss

### For Office Use Only

Case Number	Nature of Complaint Code	Institution Code
100021112	211315	800060250689

Please use this form to record all information about your complaint. An investigator will be assigned to examine the situation and will, if necessary, contact you for additional information. The results of the investigation will be communicated to you in writing. You should be aware that in order to properly evaluate your complaint and assess your records, your name must be revealed to the school at some point during our review. If you wish, the office will strive to keep your complaint anonymous during the initial stages of the investigation. If you are requesting this limited anonymity, please check this box.

Please print or type all information.

1. Name <input checked="" type="radio"/> Mr. <input type="radio"/> Ms. (please circle) <b>Daniel Rivera</b>		
2. Street Address & Apt. <b>3a Montauk Place</b>		
City <b>Staten Island</b>	State <b>N.Y.</b>	Zip Code <b>10314</b>
3. Telephone Number (include area code) <b>718 761 6443</b> Day Evening		
4. Social Security Number (of Student) <small>If no SSN, Alien Reg. #</small> <b>062604989</b>	5. Date of Birth (of Student) <b>9/28/69</b>	6. Date of Alleged Incident <b>2/5/10</b>
7. Your E-Mail Address <b>Daniel.Rivera@DanielRivera.biz</b>		
8. Name of the school which your complaint concerns <b>Trump University</b>		
9. Address and telephone number of the school <b>40 Wall Street 3<sup>rd</sup> Floor N.Y. N.Y. 10005 212-248-1800</b>		
10. Did you attempt to utilize the school's internal complaint resolution procedures? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No. If no, why not?		
11. How did you hear of the school? <input checked="" type="checkbox"/> Newspaper <input type="checkbox"/> Television/Radio <input type="checkbox"/> Other		
12. Check the box which describes your status with the school: <input checked="" type="checkbox"/> Student <input type="checkbox"/> Family Member of Student <input type="checkbox"/> Employee of School <input type="checkbox"/> Other		
13. If you are not the student, please enter the name of student		
14. If a student: Are you still at this institution? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
If no, please check box which applies: <input type="checkbox"/> Graduated <input type="checkbox"/> Terminated <input type="checkbox"/> Withdrew _____ Date		
If employee of school, please check the box which applies:		
<input type="checkbox"/> Currently Employed _____ Hiring Date		
<input type="checkbox"/> Former Employee _____ Resignation/Termination Date		
15. Name of program: <b>Ph.D. in Business Administration</b>		16. Date program began:

000333

17. Total Cost of Program <u>\$ 995</u>	18. Expected Graduation Date <u>N/A</u>
19. Was a student loan obtained? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
If yes, with what bank or financial institution?	Amount of loan: \$
20. Have you paid any money directly to the school? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
If yes, how much? <u>\$ 995</u>	
21. Was a Pell Grant obtained? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Amount: \$ Year(s)?
22. Was a TAP Grant obtained? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Amount: \$ Year(s)?
23. Are you in default of a loan? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Amount owed: \$ Year(s)?
If yes, what date were you notified? _____	
24. What result would satisfy you? <u>to be reimbursed</u>	
25. Please provide a brief explanation of your complaint. Attach additional pages if necessary and copies of all relevant documents.	
<p>I responded to a free workshop from Donald Trump University. At the workshop they sold me on taking the next step to further my Real Estate education. At the weekend seminar I went to (\$995) all they did was try to sell me the next PKG for 35K. I paid \$995 and a weekend of my life to hear a long pitch.</p>	

I hereby acknowledge that by signing this complaint form I am giving the Commissioner of Education or his representatives authority to review and secure any and all of my student records in order to appropriately review and resolve this complaint. I am also authorizing the Commissioner to request a refund on my behalf if the department determines that a violation occurred which warrants a refund.

I also acknowledge that by signing this complaint form I am giving the Commissioner of Education or his representatives authority to release my social security number and date of birth to government agencies and lenders or loan guarantors associated with this complaint, if the Commissioner of Education or his representatives deem it necessary to resolve the complaint.

If you do not agree to have your social security number and date of birth released, please check the box below. Your complaint will still be processed and investigated even if you do not presently agree to the release of your social security number and date of birth. You may be requested at a future time to permit us to release your social security number and date of birth.

[Signature]

Signature

7/19/10

Date

000334

# **Exhibit L37**





ATTORNEY GENERAL ERIC T. SCHNEIDERMAN  
 STATE OF NEW YORK  
 OFFICE OF THE ATTORNEY GENERAL  
 BUREAU OF CONSUMER FRAUDS AND PROTECTION  
 120 Broadway, 3rd Floor  
 New York, NY 10271-0332  
 Tel. (212) 416-8345 Fax (212) 416-8787

**COMPLAINT FC**  
 Consumer Hotline For Hearing  
 1 (800) 771-7755 TDD (800) 7  
 http://www.ag.ny.gov

1. PLEASE BE SURE TO COMPLAIN TO THE COMPANY OR INDIVIDUAL BEFORE FILING.
2. PLEASE TYPE OR PRINT CLEARLY IN DARK INK.
3. YOU MUST COMPLETE THE ENTIRE FORM. INCOMPLETE OR UNCLEAR FORMS WILL BE RETURNED TO YOU.
4. MAKE SURE YOU ENCLOSE COPIES OF IMPORTANT PAPERS CONCERNING YOUR TRANSACTION.

<b>CONSUMER</b>			
YOUR NAME <i>ANTONE SAIGALT</i>		HOME TELEPHONE NUMBER <i>310 9456500</i>	
STREET ADDRESS <i>P.O. Box 641902</i>		BUSINESS TELEPHONE NUMBER	
CITY/TOWN <i>Los Angeles</i>	COUNTY <i>LA</i>	STATE <i>CA</i>	ZIP <i>90064</i>
<b>COMPLAINT</b>			
NAME OF SELLER OR PROVIDER OF SERVICES <i>TRUMP University Initiative</i>		NAME OF OTHER SELLER OR PROVIDER OF SERVICES	
STREET ADDRESS <i>40 WALL ST. FL 32</i>		STREET ADDRESS	
CITY/TOWN <i>N.Y.</i>	STATE <i>NY</i>	ZIP <i>10005</i>	CITY/TOWN
TELEPHONE NUMBER <i>917-352-8298</i>		TELEPHONE NUMBER	
DATE OF TRANSACTION <i>5-16-2010</i>	COST OF PRODUCT OR SERVICE <i>\$34.995 plus</i>	HOW PAID (Check those which apply) <input type="checkbox"/> Cash <input type="checkbox"/> Check <input type="checkbox"/> Credit Card <input type="checkbox"/> Other	
DID YOU SIGN A CONTRACT? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	WHERE DID YOU SIGN THE CONTRACT? <i>in Los Angeles</i>	DATE SIGNED <i>5-16-2010</i>	
WAS PRODUCT OR SERVICE ADVERTISED? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	WHERE WAS IT ADVERTISED? <i>Web &amp; TV plus mailer</i>	DATE ADVERTISED <i>2010</i>	
TYPE OF COMPLAINT (e.g. car, mail order, etc. Use the reverse side of this form to provide details) <i>BREACH OF CONTRACT SEE ATTACHED.</i>			
DATE YOU COMPLAINED TO THE COMPANY OR INDIVIDUAL <input checked="" type="checkbox"/> By Mail <input checked="" type="checkbox"/> By Telephone <input type="checkbox"/> In Person		PERSON CONTACTED <i>MICHAEL SEATAR</i>	JOB TITLE <i>VP</i>
NATURE OF RESPONSE <i>2 letters were ignored.</i>		DATE OF RESPONSE	
HAS MATTER BEEN SUBMITTED TO ANOTHER AGENCY OR ATTORNEY? (If "Yes," give name and address) <input type="checkbox"/> Yes <input type="checkbox"/> No			
IS COURT ACTION PENDING? (Please describe as necessary) <input type="checkbox"/> Yes <input type="checkbox"/> No			
<b>ADDITIONAL INFORMATION</b>			
MANUFACTURER OF PRODUCT		PRODUCT MODEL OR SERIAL NUMBER	
ADDRESS		WARRANTY EXPIRATION DATE	
DID BUSINESS ARRANGE FINANCING? (If "Yes," give name and address of bank or finance company) <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <i>I WAS CONVINCED BY THE INTERVADER TO USE CC &amp; WILL BE PAID IN FULL BY THE FIRST MONTHS CANCEL.</i>			

PLEASE DESCRIBE COMPLAINT ON REVERSE SIDE

BRIEFLY DESCRIBE YOUR COMPLAINT

SEE ATTACHED

WHAT FORM OF RELIEF ARE YOU SEEKING? (e.g., exchange, repair or money back, etc.)

Back with interest

Full money

WHO REFERRED YOU TO THIS OFFICE?

my self

**READ THE FOLLOWING BEFORE SIGNING BELOW**

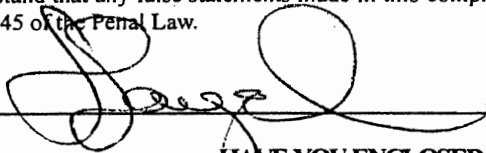
PLEASE ATTACH TO THIS FORM **PHOTOCOPIES** of any papers involved (contracts, warranties, bills received, canceled checks, correspondence, etc.). **DO NOT SEND ORIGINALS.**

**NOTE:** In order to resolve your complaint, we may send a copy of this form to the person or firm about whom you are complaining.

In filing this complaint, I understand that the Attorney General is not my private attorney, but represents the public in enforcing laws designed to protect the public from misleading or unlawful business practices. I also understand that if I have any questions concerning my legal rights or responsibilities, I should contact a private attorney. I have no objection to the contents of this complaint being forwarded to the business or person the complaint is directed against. The above complaint is true and accurate to the best of my knowledge.

I also understand that any false statements made in this complaint are punishable as a Class A Misdemeanor under Section 175.30 and/or Section 210.45 of the Penal Law.

Signature:



Date:

4-30-2011

**HAVE YOU ENCLOSED COPIES OF IMPORTANT PAPERS?**

Return to: **Office of the Attorney General  
Bureau of Consumer Frauds and Protection  
120 Broadway, 3rd Floor  
New York, NY 10271-0332**

Office of the Attorney General  
Eric T. Schneiderman  
State of New York  
Attn: Judy Blumenberg

In May 4<sup>th</sup> 2010 we attended free real estate seminar from Trump university held at Marina Del Rey Marriott lasted 2 hours of listening to the speaker discussing how can people making money in real estate especially at the time. At the end the speaker introduced three day training for \$1495.00 which will teach you everything needed how to be a savvy investor. I was not able to get my question answered from neither the speaker nor the assistance. I was directed to contact the training department at Trump University and I spoke to Terry Willardson @ 1-646-810-7341 and discussed where the hands on training will take place. His response was in Los Angeles. He suggested speaking with the coordinator April Neumann for more accurate information. I spoke to April Neumann @ 646-367-3802 and she agreed with Terry that all the trainings will take place in Los Angeles. I called Terry and purchased the 3 day training for May, 14, 15, and 16 at the Embassy suites in Glendale. At the last day of the training different packages were introduced, Gold, Silver and Bronze (see attached). After discussing the different deals with the instructor and assistance it was suggested it would be more advantages to purchase the Gold Elite package which will have 3 days in the field mentorship since we need in order to succeed. It was recommended by the instructor to utilize OPM (other people money, credit card company) to pay for the 35,000.00. Since will be mentored by a top instructor and investor, and will be able to have the first deal and payoff the credit card with the first 30 days. Of course Trump and everyone in his organization will make more money.

As indicated under the enrolment section of the Trump Gold Elite of the contract.

Creative Financing Retreat (have not used).

Commercial & Multi-Family Retreat (have not used).

The three day in-Field Mentorship is the bulk of the money (have not used)

Wealth Preservation Retreat (used in Los Angeles).

Quick Start Real Estate Retreat (used In Chicago). Hotel accommodations and airline tickets for two people. It was recommended to attend Quick start real estate retreat as the first training. It turned out that this training is only available in Chicago, and will not take place anywhere else. This was a heck of a surprise to us since we were told that all Los Angeles residence training will be held in Los Angeles and vicinity. We were forced to attend the training in Chicago in June 2010, which was instructed by Chris Goff. At the last day of the training we were presented with a new group program designed by Chris to help us with problems that might come up dealing with real estate issues that we are not familiar with. The program cost is \$ 995.00 for one year once a month for an hour by phone. We had two sections, when abruptly the program was suspended without our knowledge.

The rest are either part of the other or on line as indicated.

All hands on retreats where to be done in Los Angeles according to the Terry and Neumann. That was a key issue in making a decision enrolling in Trump University. Since we spent almost \$35,000.00 for the training the last thing was on our mind is to worry about more expenses such as traveling and hotel accommodation.

After initial training we had some difficulty getting in touch with Trump university training coordinators. We never received a phone or an email to notify us of upcoming seminars/training. Prior of joining Trump University any information and responses where done in a fast fashion. Since we joined responses became very slow, you lucky if someone pick up the phone, and leaving a voice mail made no

000338

difference no response at all. Position eliminations made it very difficult to know when the next training is going to be and if someone calls back after leaving a voice mail. From one day to another the person you spoke or left a voice mail to might not be there to answer your concern since the job was eliminated. When we use to check the web for the available training this is the message we use to get. We don't have any upcoming sessions scheduled right now, check soon.

We have joint Trump University in Good faith, but Trump University decided to breach the contract by eliminating hands on training, which we were charged for 35,000.00. Including one on one three days in the field, By changing the training from hands on to a web based Trump University/Initiative is saving hundreds of thousands of dollars money traveling and accommodations to the instructors and staff, the only winner is Trump . We are in worse financial situation than when we started. The monthly interest is between 350 and 450 dollars plus the principle. What we paid for in training we should have made it within the first month according to the instructors and assistants. I believe the CLASS ACTION law suit filed in San Diego April 2010 speaks about everyone in details.

After spending so much time, and money sending out letters to prospective buyers and sellers, not to mention driving around looking for properties, dealing with real estate agents, also we purchased a seller and buyer captured software, for \$ 1995.00 in one of the seminars offered by Trump after the initial 3 day training. None of the material had made us money, except more expense which adds up to our credit card bill.

We were invited to a seminar in 2010 which was presented by Bill canon/ Trump which was a real estate tour buying opportunity cost is \$ 3000.00 for two people. (Did not purchase.) It seems whenever we get an invitation always is for the reason to sell you a different package.

Due to the misrepresentation of real estate deals and believing in unreal expectation by Trump University, the following has happened.

In Nov 2010 we had to move out of our apartment due to not being able to afford the rent.

We are living with family to weather the storm, not known for how long we are able to stay.

My wife lost her job, and looking to sell her car to be able to survive for a few more months if possible.

My job is rocky and hardly making enough to survive, and possibly going out of work very soon.

My credit cards are full and credit limit has been cut in half, which I cannot use any longer.

We strongly believe that we were cheated by the misrepresentation and breached of contract and must get our money back in full.

On Feb 18, and 25, 2011 a demand letter was sent out to Michael Sexton ( VP ) of Trump University, NEVER RECEIVED A RESPONSE. Letter was ignored.

On March 22, 2011 the same letter was mailed out to Michael Sexton ( CERTIFIED ) and received tracking # 7009-2250-0001-8421-9592 on March 29, 2011. Again it was ignored.

Attached is copy of Trump university contract.

I can be reached at 310-945-6500.

Thanks.

Antoine Saigali.

000339

Business Bureau either.

---



Better Business Bureau  
Serving Metropolitan New York, Long Island, and the Mid-Hudson Region

30 East 33rd Street  
New York, NY 10016  
(212) 533-6200  
FAX  
www.newyork.bbb.org

**Case #:** 8565461

**Consumer Info:** Saigali , Antone  
Po Box 641902  
Los Angeles , CA 90064  
  
TESANC@verizon.net

**Business Info:** The Trump Entrepreneur Initiative  
40 Wall Street, 32nd Floor  
New York, NY 10005  
2128363216

**Date Filed:** 5/6/2011

**Nature of the Complaint:** Advertising Issues

**Consumer's Original Complaint:**  
see Attached document

**Consumer's Desired Resolution:**  
see Attached document

000341

**Business/Consumer Response & Rebuttals:**

**04/14/2011**

**Accounts Payable**

Respond to Complaint

In May 2010 Mr. Saigali purchased training. Since that time, he attended live training and retreats and had access to the online resources which are an integral part of the program. In addition, his mentor Keving Derrick has been providing phone coaching over the past nine months. Mr. Saigali has not yet completed his 3-day field mentorship that he is entitled to because Mr. Saigali has pushed off scheduling his field mentorship multiple times. Information was provided that Tony and his wife are experiencing a financial hardship and that is the only reason they are asking for their money back. Customer Service has spoken to Tony repeatedly and told him although his financial situation is unfortunate, it does not affect the program he purchased or our ability to deliver services. The terms of the services have not been materially altered as the letter states without being specific, and the mentorship can occur at a time and place of his liking. No guarantees of success are made, and there are disclaimers accordingly. Mr Saigali continues to use the resources that are part of the program, and he is receiving everything that he is entitled to and willing to participate in.

---

**05/08/2011**

**Antone Saigali**

The business's response does not resolve my complaint.

Better Business Bureau:

I have reviewed the response made by the business in reference to complaint ID# 8565461, and have determined that this does not resolve my complaint.

To assist the BBB in bringing this matter to a close, please explain why this does not resolve your complaint:

Sincerely,

Antone Saigali

Better Business Bureau

Graham Gardner Mediator

ID # 8565461 Trump University /initiative

This is in response to the letter received 5/6/2011.

000342

We have attended two retreats (Quick Start) in Chicago June 2011, and Wealth preservation in Los Angeles in Sept, 2011.

What we have not used are the following.

Creative Financing, Commercial & Multi-Family, and 3 day in field mentorship.

As far as customer service I use to speak to them whenever I need to find out about available training since I was not receiving emails, and majority of the time I had to leave a voice mail which never received a response. I had to keep on trying until someone answers. Which are Paul Reisner, and Jason Schauer?

Last time I spoke to customer service Mark Covais when I requested money back, unfortunately he became aggravated and informed me that I will never get the money back.

The contract indeed has been altered or modified, when all the trainings became on line trainings and not in a classroom hands on in Los Angeles according to April Neumann the training coordinator and her associates who know best about the program/packages. I quote she said whoever attended and purchased the program/package in Los Angeles, the training will be conducted in Los Angeles. If I wanted to do online training I would have paid less than \$ 500.00 and even received a real estate license, and get credit.

Our Financial situation was caused by trump university/initiative at the third day of training in May 2010, when we were sold a package for 34,995.00 after instructor suggested negotiating with my credit card company for a better interest rate and increased my credit line to accommodate the cost of the package. It was suggested by the instructor/staff selecting the proper mentor; the tuition will be made within 30 days when the first property is purchased. That was how we were lured to purchase the Gold package. Now I know we were given false information used with someone to make more commission.

Since we were not able to find properties with owner finance, rent to own, Zero down to mention a few, or others suitable for us without using our own money which we did not have. Since we needed to satisfy the credit card payments which became excessively high to keep up with. Kevin derrick and we decided to slow things down until we find a suitable deal that we can get.

Tony Saigali.

---

**05/11/2011**  
**Mark Covais**

Respond to Complaint

In May 2010 Mr. Saigali enrolled in training with The Trump Entrepreneur Initiative. Since that time, he attended live training and retreats and had access to the online resources which are an integral part of the program. In addition, his mentor Kevin Derrick has been providing ongoing phone coaching over the past eleven months. Mr. Saigali has not yet completed his 3-day field mentorship that he is entitled to because Mr. Saigali

000343



has pushed off scheduling his field mentorship multiple times. Tony and his wife have lost their jobs and are experiencing financial hardship and that is the only reason they are asking for their money back. We have spoken to Tony repeatedly and told him although his financial situation is unfortunate, it does not affect the program he purchased or our ability to deliver services. The terms of the services have not been materially altered, and the mentorship can occur at a time and place of his liking. No guarantees of success are ever made, and there are disclaimers accordingly.

---

**05/19/2011**  
**Antone Saigali**

The business's response does not resolve my complaint.

Better Business Bureau:

I have reviewed the response made by the business in reference to complaint ID# 8565461, and have determined that this does not resolve my complaint.

Since purchasing the training we attended only two live retreats. No other live retreats as indicated by Trump representative. One in Los Angeles as it suppose to be, and the second in Chicago , which is breach of contract, which cost us about \$ 2000.00 in traveling and accommodation above and beyond the \$ 35000.00. We have spoken to Kevin on multiple occasions, only on two occasions we discussed real estate deals in LA which we (my wife and I) worked so hard with a real estate agent and the owner to get a deal going, which none of worked out. I Tony did not lose my job as you mentioned. I need to pay for the credit card which I was lured to believe by deception, super inflated, unrealistic expectation and promises by Trump University/Initiative I quote "you will get your full tuition back within the first 30 days working with the proper mentor.

I need to know the following.

1-In your last response you said (we have spoken to Tony repeatedly about his financial situation). We is

too many I DEMAND to know who spoke to me and how many times.

2- Has the training format changed if any since I signed up.

May, 18,2011

(Tony) Antone Saigali

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**05/27/2011**  
**Mark Covais**

000344

## Respond to Complaint

Mr. Saigali purchased the Trump Gold Elite Program on 5/17/2010. From that date until 11/19/2010 there were twenty one retreats Mr. Saigali was eligible to attend. Seven out of the twenty one were held in California. The location and dates for all these retreats were listed on our site as they came up every month. It was Mr. Saigali's choice to only attend two. He chose the retreat in Chicago and to incur the costs of traveling. After 11/19/10The Trump Entrepreneur Initiative changed the medium in which to deliver the retreat curriculum. This change was requested by the majority of our students in the form of surveys collected at the end of our retreats. The purpose is to improve our customers experience. We now offer Virtual Retreats that our students can download and keep forever. By all measure these new retreats are improvements of the originals. To date Mr. Saigali has received and can use all the retreats eligible to him.

In regards to Mr. Saigali's mentorship, it's location, and his mentor Kevin Derrick. Ultimately the student has final decision and chooses the location of his mentorship. The mentor can only make recommendations based off his experience and work within the parameters the mentee outlines. Kevin's recommendation to invest outside of Mr. Saigali's home market was the response to Mr. Saigali's indicating he had no capital to invest with. This was due to the fact him and his wife lost their jobs. Kevin chose a market that would work with Mr. Saigali's limited financial resources. One he could find financing and be able to put a deal together quickly.

In addition to talking to Kevin about his financial situation, Mr. Saigali shared that information with me. Mr. Saigali and I have spoken three times and as part of our conversations he indicated to me that him and his wife have lost their job and have been forced to move in with their parent. He did not feel he could benefit from the program that he purchased due to that fact and needed the tuition money back to survive on and pay bills. These sentiments were also echoed to our customer service manager on two other separate occasions.

The Trump Entrepreneur Initiative has maintained from the beginning that it would like to fulfill its obligation to Mr. Saigali . We have offered him an extension to his one year contract that expired 5/17/2011. Mr. Saigali is the only one prohibiting the completion of his education by not allowing the scheduling of his three day mentorship.

---

**06/04/2011**  
**Antone Saigali**

The business's response does not resolve my complaint.

ID # 8565461

IT IS A PROFESSIONAL PRATICE TO IDENTIFY YOUR SELF WHEN ADDRESSING SOMEONE , WHICH YOU HAVE NOT DONE FROM THE BEGINNING! WONDER WHY?.

You mentioned that there where 21 retreats eligible to attend. Seven out of the 21 where held in California. Now tell me WHEN and WHERE Creative Financing, Commercial and Multifamily where held in LOS ANGELES. The two retreats we attended there was no mention of changing the retreat training to a web training. I guess we were excluded from that survey.

000345

It was not our choice to attend only two retreats, but every time we look at your website for the training schedule on Creative Financing and Commercial and Multifamily retreats either no schedule listing try again later, so we use to call and leave messages to customer services not even one time we a call back.

The whole class was instructed by the instructor to take Quick Start retreat before any other retreats. Since this is considered to be the foundation of the program. This retreat was only held in Chicago by Chris Goff, and that's why we had to attend. We trusted the Trump University/Initiative representative.

If we wanted to get virtual retreats (Online) we would have paid \$ 2995.00. The only reason you altered and breached the contract is for your own benefits, you made a killing on the tuitions, by offering false promises of live hands on retreats.

As Far as mentoring it makes no difference where it takes place or the property is purchased. Since all the deals requires money which we do not have. Not to mention traveling expenses to add to our credit card bill. Kevin is a great guy, but he cannot perform miracles as we were told by Trump instructors. I quote the instructor "the tuition will be made within 30 days when the first property is purchased". That was how we were lured to purchase the Gold Elite Package. Now I know we were given false information used with someone to make more commission. We have not made money in the first 30 days as promised. Since we were not able to find properties with owner finance, rent to own, Zero down to mention a few, or others suitable for us without using our own money which we did not have. Since we needed to satisfy the credit card payments which became excessively high to keep up with.

I Tony did not lose my job as you mentioned (I'M STILL WORKING). I need to pay for the credit card which I was lured to believe by deception, super inflated, unrealistic expectation and promises by Trump University/Initiative. It is impossible to benefit from a program that was entered into in good faith by one party only, and which has been altered to benefit the provider only Trump University/Initiative.

IT IS TIME FOR YOU TO REFUND OUR MONEY.

I LIKE TO KNOW WHAT EXTENTION YOU OFFERED ME PERSONALLY.

6-3-2011

Tony Saigali.

---

**06/10/2011**  
**Mark Covais**

Respond to Complaint

Tony it is Mark Covais writing this response. I apologize for not identifying myself in our previous responses. I had thought it was evident who was responding based on the lay out that I'm looking at on the BBB website. We

000346

have spoken before and I have nothing to hide or that I wouldn't say to you over the phone or in person.

I have taken your last response and broken it up by issues/complaint and assigned a complaint number to each one. This is to help me organize our response and make sure I address each of your issues/complaints individually. When reviewing my responses please refer to the corresponding complaint numbers.

Response 1) Please refer to the attached list of Premium Retreats. After complying the list there were actually 24 retreats you were eligible to attend in the U.S, and Canada.

Response 2) At the time you attended the retreats the decision had not been made. Every student should receive a survey in the packet that we hand out when you attend. It is not mandatory that you fill it out and hand it in. I apologize if for some strange reason both your packets for both retreats did not include a survey, but the more likely explanation is that you overlooked them or through them out.

Response 3) All of our retreats were always listed on our site for a minimum of three weeks before the event. As to why you couldn't see them on our site I have no explanation, I can just confirm that they were there. Unfortunately we do not keep a log of incoming calls or voicemails; we only track our outbound calls. You should have received a call back, we do have a customer service team that checks and responds to all voicemails every day.

Response 4) As you can see from the attached Premium Retreat List, there were alternatives to the Chicago event. As far as the order in which you should have attended these retreats were solely based off of Steve Goffs's recommendation and in no way mandatory.

Response 5) As previously stated, The only reason our format was changed, was in response to our students feedback.

Response 6) This statement is completely inaccurate and only reflects your personal opinion. The fact of the matter is, there are several investment strategies in which you don't need to use your own money or credit to invest in real estate. These investment strategies have been around for years, and it's just a matter of implementing them. You certainly do not need to travel to invest, but there are some markets that are better than others. Your mentor (Kevin Derrick) can work with you in any market, that choice is yours. My personal feeling is, and again I've shared this with you over the phone. These strategies do work but they take effort and commitment on your part which I don't think you were willing to make.

Response 7) Our speakers /presenter/ instructors are prohibited from making any kind of statement promising results like that. Below is our company policy on such matters and I do not believe that any of them would make that statement, especially if they wanted to continue working with us.

: No guarantees, promises, representations or warranties of any kind regarding specific or general benefits, monetary or otherwise, have been or will be made by The Trump Initiative, its affiliates or their officers, principals, representatives, agents or employees.

Response 8) I apologize if that information is inaccurate. I based my repeated response that this complaint is financially motivated, due to several notes entered into our system by Paul, Kevin and myself where you stated

you were unemployed.

Response 9) I am sorry you feel this way but it couldn't be any further from the truth. The Trump Entrepreneur Initiative only goal is for our student to benefit from our programs. The only that is possible is if our student willingly participate in our programs.

Response 10) The Entrepreneur Trump Initiative will not issue you a refund.

Response 11) Attached is the email that was sent to you on April 8 offering you an extension of your contract until June 16th. I will extend that offer an additional 30 days until July 16th so you can take full advantage of your mentorship with Kevin and or any other mentor. We hope you take us up on your the additional extension, and if you choose not to, we will consider your contract expired and our services refused.

See Your Response Below For Reference

Complaint 1) You mentioned that there where 21 retreats eligible to attend. Seven out of the 21 where held in California. Now tell me WHEN and WHERE Creative Financing, Commercial and Multifamily where held in LOS ANGELES.

Complaint 2) The two retreats we attended there was no mention of changing the retreat training to a web training. I guess we were excluded from that survey.

Complaint 3) It was not our choice to attend only two retreats, but every time we look at your website for the training schedule on Creative Financing and Commercial and Multifamily retreats either no schedule listing try again later, so we use to call and leave messages to customer services not even one time we a call back.

Complaint 4) The whole class was instructed by the instructor to take Quick Start retreat before any other retreats. Since this is considered to be the foundation of the program. This retreat was only held in Chicago by Chris Goff, and that's why we had to attend. We trusted the Trump University/Intitiative representative.

Complaint 5) If we wanted to get virtual retreats (Online) we would have paid \$ 2995.00. The only reason you altered and breached the contract is for your own benefits, you made a killing on the tuitions, by offering false promises of live hands on retreats.

Complaint 6) As Far as mentoring it makes no difference where it takes place or the property is purchased. Since all the deals requires money which we do not have. Not to mention traveling expenses to add to our credit card bill. Kevin is a great guy, but he cannot perform miracles as we were told by Trump instructors.

Complaint 7) I quote the instructor "the tuition will be made within 30 days when the first property is purchased". That was how we were lured to purchase the Gold Elite Package. Now I know we were given false information used with someone to make more commission. We have not made money in the first 30 days as promised. Since we were not able to find properties with owner finance, rent to own, Zero down to mention a few, or others suitable for us without using our own money which we did not have. Since we needed to satisfy the credit card payments which became excessively high to keep up with.

Complaint 8) I Tony did not lose my job as you mentioned (I'M STILL WORKING). I need to pay for the credit card which I was lured to believe by deception, super inflated, unrealistic expectation and promises by Trump University/Initiative.

Complaint 9) It is impossible to benefit from a program that was entered into in good faith by one party only, and which has been altered to benefit the provider only Trump University/Initiative.

Complaint 10) IT IS TIME FOR YOU TO REFUND OUR MONEY.

Complaint 11) I LIKE TO KNOW WHAT EXTENTION YOU OFFERED ME PERSONALLY.

---

**06/20/2011**  
**Antone Saigali**

The business's response does not resolve my complaint.  
Better Business Bureau:

I have reviewed the response made by the business in reference to complaint ID# 8565461, and have determined that this does not resolve my complaint.

To assist the BBB in bringing this matter to a close, please explain why this does not resolve your complaint:

Sincerely,

Antone Saigali

---

**06/27/2011**  
**Mark Covais**

Respond to Complaint

Hi Graham, thanks again for taking the time to talk to with me yesterday. Attached is a copy of the contract that Tony signed. I'm sure you'll agree that his "breach of contract" claims are unjustified. The only thing that is apparent to me is that his contract has expired and we are no longer required to provide any service. All attempts to continue to working with him are out of good will. I look forward to hearing your feedback.

Thank you,

Mark

---

**07/05/2011**  
**Mark Covais**

000349

Respond to Complaint

Hi Graham, as discussed, even though the Trump Initiative feels that we have done nothing wrong and that Mr. Saigali is not eligible for a refund. We are willing to offer Mr. Saigali a partial refund of \$5995 as a good will gesture in an attempt to resolve this matter, satisfy all parties and bring the matter to a close. We came to that figure by prorating the two \$4995 Retreats and crediting him for every month they were not offered live in 2011, up until his contract expired in May. Also included in the \$5995 amount is a previously offered but never accepted refund of \$995 for a Quick Turn Investor's Club with Home Study Companion that was returned. To receive a check for the partial refund offered Mr.Saigali will have to sign a release. Upon acceptance we will part as friends and consider our relationship with Mr. Saigali to be ended. Please let me know his decision.

Thank you,

Mark Covais

The Trump Entrepreneur Initiative

40 Wall Street, 32nd Floor

New York, NY 10005

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

Phone: 646.810.7339

Fax: 212.248.0782

[mcovais@Trumplnitiative.com](mailto:mcovais@Trumplnitiative.com)

---

**07/13/2011**

**Antone Saigali**

The business's response does not resolve my complaint.

Better Business Bureau:

I have reviewed the response made by the business in reference to complaint ID# 8565461, and have determined that this does not resolve my complaint.

To assist the BBB in bringing this matter to a close, please explain why this does not resolve your complaint:

Sincerely,

Antone Saigali

---

TL orange, CA

12:57am on Tuesday, May 4th, 2010 ★☆☆☆☆

I read lots of Trump books and had admiration for Mr. Trump. Therefore, I went to the 2 hours free information and was sold a 3 days how to profit in foreclosure for \$1495. Then came the 3 days which I was looking forward to; and there was Mr. J. Harris there waiting for the trap. He told us that you can not learn anything in 3 days unless you get a mentor who will help you succeed in this business. During the 3 days, they misleading you to open more credit cards, raise your credit lines, and call anyone who have money to pay for their expensive \$35,000 seminars package. Mr. J. Harris also said that Mr. Trump is so wealthy that he doesn't need your pity \$35,000, he only did it because he felt right to do so and help out people, which was totally B.S.

The mentor came out, some from out of state, some from other regions, some doesn't even know the area, and they all tried to teach you about your areas. The mentor I had tried to sell me stuffs out of state, which I'm living in CA, and I believe it was totally wrong. They didn't teach you anything about seller financing, negotiations, finding deals, or funding deals, or any other useful strategies that the real deals are using.

They took you around go look at houses, and told you to make low offers on REO. Going to look at houses, you can get agents to show you at houses for free of charge. Make low offers, you can go get agents to help you write offers all day long. Also, making low offers on REO is like running along with the herds, everyone is doing it, there's nothing special about it.

3 days go by and they just doing the same everyday. Nothing special. The third days, they hand you some random websites that they'd pulled off from internet and tell you to visit it. Gave you some phony agent number from somewhere and told you to call, which the agent refused to make low offers for you. And, there, the mentor went off to the sunset along with your \$35k.

I am very disappointed for some one whom I always look up to with very high regards!!!!

T. L. of O.C. CA

---

susan MI

2:52pm on Sunday, April 11th, 2010 ★☆☆☆☆

We purchased a mentor program for \$19,000 in December 2008. We did not receive the promised materials or mentor service. We canceled immediately, calling both Rochester NY & Boca Raton FL. Unfortunately we paid by check and did not have a credit card company to help us get our money back. We have made several call, emails, faxes, etc. We've been lied to, deceived, promised the person with "authority" would call us back immediately (doesn't matter when you call, they are never in) and told there was a glitch in their system and our refund was being processed. We still do not have our refund and they continue to play the game. Does this sound like Donald Trump is an honest man concerned with helping you build wealth? Run in the opposite direction and don't look back. Does anyone have any suggestions to help us get our money back? They would not respond to the Better

000351



07/13/2011  
Antone Saigali

Respond to Complaint

It is very clear the offer is and offensive.

Tony

---

# Exhibit L38



Better Business Bureau  
Serving Metropolitan New York, Long Island, and the Mid-Hudson Region

30 East 33rd Street  
New York, NY 10016  
(212) 533-6200  
FAX  
www.newyork.bbb.org

**Case #:** 832931

**Consumer Info:** Savage, Terri  
809 Admiral Graverly Blvd  
Richmond , VA 23225  
8046743046  
terri.savage@vadoc.virginia.gov

**Business Info:** The Trump Entrepreneur Initiative  
40 Wall Street, 32nd Floor  
New York, NY 10005  
(212) 810-7358

<http://www.trumpinitiative.com>

**Date Filed:** 12/4/2008

**Nature of the Complaint:** Contract Issues

**Consumer's Original Complaint:**

CONSUMER STATES:

Trump University tells people in the Richmond area that one can get all the information needed to started your business in a three-day training on November 21-23, 2008 from 8:15 to 6PM for \$1,495.00. This company guarantees that you will get everything needed know for started this business in becoming real estate investor and foreclosure real estate. If one is not satisfied with the training, he/she has 1 year to get a refund. The training was nothing as advertised or promoted, which is a breach of the contract. I contacted Trump University and spoke with Jason Schauer who refused to give my refund back.

**Consumer's Desired Resolution:**

000354

**Business/Consumer Response & Rebuttals:**

# **Exhibit L39**

<b>Record # 2 / Consumer Sentinel Network Complaints</b>			
<b>Reference Number:</b>	30938978	<b>Originator Reference Number:</b>	
<b>Language:</b>	English	<b>Contact Type:</b>	Complaint
<b>Source:</b>	Consumer	<b>DNC?</b>	N
<b>Comments:</b>	I got divorced in October of 2008. I came across Trump University's add in the newspaper in May 2009. I had been thinking about a way to invest/start a business. The first seminar was free. Information at this seminar made it seem possible that I could invest in real estate. I paid 1,495.00 to attend a three day seminar, where I would be taught how to invest in real estate. I made a point of telling them from the beginning that I would need someone to walk me through a deal, since I have multiple sclerosis and had a stroke. I was assured that this would happen. At the second seminar, I learned a bit more, then was asked about my credit cards and savings. At this point, I really believed I could do it. I then, foolishly, "invested" in more classes. In July 2009, I attended a creative financing seminar in LA. I was told I would get a personal mentor for my first deal. This cost another 2000.00. I returned home and could not get a hold of my mentor. I finally spoke with him the following April 2010. I am now receiving section 8 housing and living on SSI. When I received my divorce settlement, it was supposed to keep me housed. I don't understand how they can take my money and not help me get a house...I wanted to depend on me, not my government. Thank you... PS9000: I lost money to Trump University Other-Other Update		
<b>Was the complaint resolved?:</b>		<b>Complaint Resolution:</b>	
<b>Data Reference:</b>			
<b>Entered By:</b>	FTCCIS-FTCUSER	<b>Entry Date:</b>	6/7/2011
<b>Updated By:</b>	CRSSrcondon	<b>Updated Date:</b>	6/14/2011
<b>Complaint Source:</b>	FTC Online Complaint Assistant (CIS)	<b>Product Service Code:</b>	Education: Trade/Vocational Schools
<b>Amount Requested:</b>	\$25,000.00	<b>Amount Paid:</b>	\$14,000.00
<b>Payment Method:</b>	Check (Not Classified)	<b>Agency Contact:</b>	Internet
<b>Complaint Date:</b>	6/7/2011	<b>Transaction Date:</b>	5/25/2009
<b>Initial Contact:</b>	Internet (Other)	<b>Initial Response:</b>	Internet/E-mail
<b>Statute/Rule:</b>	FTC Act Sec 5 (BCP)	<b>Law Violation:</b>	Deception/Misrepresentation
<b>Topic:</b>		<b>Dispute with Credit Bureau?:</b>	
<b>Dispute with Credit Bureau - Responded?:</b>		<b>Dispute with Credit Bureau - Resolved to Satisfaction?:</b>	
<b>Member of armed forces or dependent?:</b>			
<b>Consumer Information</b>			
<b>Consumer</b>			
<b>Complaining Company/Org:</b>			
<b>First Name:</b>	Rita	<b>Last Name:</b>	Scharbach
<b>Address 1:</b>	10102 8th Ave S Apt B7	<b>Address 2:</b>	
<b>City:</b>	Seattle	<b>State:</b>	Washington
<b>Zip:</b>	98168	<b>Country:</b>	UNITED STATES
<b>Home Number:</b>	206-7086652	<b>Work Number:</b>	206-7086652
<b>Fax Number:</b>		<b>Ext:</b>	
<b>Email:</b>	scharbach3@yahoo.com	<b>Age Range:</b>	50 - 59
<b>Military Service Branch:</b>		<b>Soldier Status:</b>	
<b>Soldier Station:</b>			
<b>Subject</b>			
<b>Subject:</b>	Trump University		
<b>Address:</b>	40 Wall Street 32nd Floor		

<b>City:</b> New York City	<b>State/Prov:</b> New York
<b>ZIP:</b> 10005	<b>Country:</b> United States
<b>Email:</b>	<b>URL:</b>
<b>Area Code:</b>	<b>Phone Number:</b>
<b>Ext:</b>	<b>Subject ID Type:</b>
<b>Subject ID Issuer State:</b>	<b>Subject ID Issuer Country:</b>
<b>Representative Name:</b> Gertald Martin	<b>Title:</b> unknown

# Exhibit L40





Todd P. Haymore  
Commissioner

# COMMONWEALTH of VIRGINIA

## Department of Agriculture and Consumer Services

PO Box 1163, Richmond, Virginia 23218

Phone: 804/786-3501 • Fax: 804/371-2945 • Hearing Impaired: 800/828-1120

[www.vdacs.virginia.gov](http://www.vdacs.virginia.gov)



May 12, 2009

Mrs. Wilhelmina P. Summers  
10024 Purcell Road  
Henrico, VA 23228

**RE: 900706 Mrs. Wilhelmina P. Summers vs. Trump University**

Dear Mrs. Summers:

Thank you for authorizing the Office of Consumer Affairs to assist in the resolution of your dispute. Unfortunately, we were unable to resolve your dispute, and as a result we have closed your complaint.

Although our office is unable to assist you further in resolving this dispute, you may want to consult an attorney to determine your best course of action. If you do not have an attorney, you may contact one through the Virginia Lawyer Referral Service at (804) 775-0808.

The Office of Consumer Affairs will retain the complaint form and copies of all official correspondence regarding this matter for three years. Pursuant to the **Virginia Freedom of Information Act (FOIA)**, these materials will be made available to the public upon request.

If you have any additional information or need further assistance, please contact me at (804) 786-1308 or (800) 552-9963, extension 61308 within Virginia. My email address is [erin.williams@vdacs.virginia.gov](mailto:erin.williams@vdacs.virginia.gov). The fax number is (804) 225-2666.

Sincerely,

Erin Williams  
Dispute Resolution Specialist  
Dispute Resolution and Investigations Unit

cc: Brad Schneider, Trump University

-Equal Opportunity Employer-

TRUMP 00117817

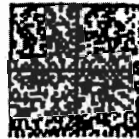
000360

COMMONWEALTH OF VIRGINIA  
DEPARTMENT OF AGRICULTURE AND CONSUMER SERVICES  
P.O. BOX 1163  
RICHMOND, VIRGINIA 23218

Brad Schneider  
Trump University  
40 Wall Street, 32nd Floor  
New York, NY 10005-1304

CALTSN1 19905

PRESORTED  
FIRST CLASS



UNITED STATES POSTAGE  
02 1M  
0004251114  
MAY 15 2009  
MAILED FROM ZIP CODE 23231  
\$00.382  
FIRST CLASS

TRUMP 00117818  
000361

# Exhibit L41



Better Business Bureau  
Serving Metropolitan New York, Long Island, and the Mid-Hudson Region

30 East 33rd Street  
New York, NY 10016  
(212) 533-6200  
FAX  
www.newyork.bbb.org

**Case #:** 8199535

**Consumer Info:** Thompson, Patricia  
2644 Legends Way  
ELLCOTT CITY, MD 21042  
4104615949  
aprilpat@mac.com

**Business Info:** Trump University  
40 Wall Street 32nd Floor  
New York, NY 10005  
-

**Date Filed:** 12/2/2010

**Nature of the Complaint:** Product Issues

**Consumer's Original Complaint:**

I attended a free seminar on Real Estate Investing at The Hilton in Columbia, MD on 1/20/2010, they had us attend a 3 day seminar for \$1,495.00 at that seminar they had us sign up for a 10K, 20K, or \$34,995.00 Elite class. All the class was pressured and I ended up with the Elite 35K course. Paul Reisner ,PM (646) 810-2117 called and gave direstion until Troy Peterson, Mentor (407) 592-6377 took over; we were to have weekly sessions. This did not happen. Paul started me doing 6 web based training modules and they were to be completed before classes started in 2 weeks. I was to read Donald Trumps Book, did not have it; took Paul 2 weeks to get it to me. Had to cancel my training as the web based training did not work. I have a Masters and sold computers for Digital Equipment Corp as well as web based training. After 5 days of struggling with the training and calling Trump asking for IT department for help(Trump would not let me talk to IT) I sent Paul and Troy an e-mail 2/13/10 outlining most of the problems with the training and saying I needed to leave Trump. Some of the issues were: Pages would not open, Maps had no legends, spent 2 days mapping Empire City on one module before I could start the assignment. Paul had to copy instructions for one module as I could not open it and e-mail the directions.I paid 3K for this non-working service. I paid \$420.00 to use their Foreclousure Deal Source Property Listing Service every time I followed a lead it had closed; so gave up on this endeavor. I sent Mr. Michael Sexton, Director of Trump University an e-mail on 3/2/10 requesting a refund on the unused portion of my tuition \$31,860.00. Bear in mind the other \$3,420.00 services had not worked. Gilian Bernie, Program Director (646)810-7385 called and said NO refunds. I do not use the web site and I would like a refund of \$31,860.00.

**Consumer's Desired Resolution:**

\$31,86.00 unused services  
or prorated 2 paid services of 420.00, and 3K for ? total.

online training that didn't work - \$3,000

Foreclosure and property deal service - did not use. - \$420.

000363

**Business/Consumer Response & Rebuttals:**

**06/21/2010**

**Ms. Patricia E. Thompson**

Respond to Complaint

Phone call with consumer on 6/16 - fax documents will attach.

---

**08/02/2010**

**Ms. Patricia E. Thompson**

The business has responded to me directly.

Better Business Bureau:

At this time, I have been contacted directly by Trump University regarding complaint ID 8199535.

1. Has your complaint been resolved?

NO

2. If not, then please explain:

we are having a phone conference tomorrow.

Sincerely,

Patricia Thompson

---

**08/05/2010**

**Ms. Patricia E. Thompson**

Respond to Complaint

Dennis Keefe from the Md Attorney Gen. Office and I had a con-call with April Newman on Tues. at 10:00am. Everyone stated their positions and it was agreed she would speak to Troy Peterson and Michael Sexton of Trump and we would conference call again next Tuesday at 10:00 am with some kind of resolution. Dennis is not to hopeful it will be favorable as she has avoided him and would not admit her lack of communicating with him. So we will see.

Thanks!

Pat

---

000364

**12/02/2010**  
**April Neumann**

Respond to Complaint  
Attached is the response received from The Trump Initiative.

---

**12/02/2010**  
**Ms. Patricia E. Thompson**

I accept the business's response to this complaint.

Better Business Bureau:

I have reviewed the response made by the business in reference to complaint ID 8199535, and find that this resolution is satisfactory to me and the matter has been resolved. Trump and I have settled on a dollar amount for damages and I have received payment. The matter is closed.

Sincerely,

Patricia Thompson

---

000365

# Exhibit L42



Better Business Bureau  
Serving Metropolitan New York, Long Island, and the Mid-Hudson Region

30 East 33rd Street  
New York, NY 10016  
(212) 533-6200  
FAX  
www.newyork.bbb.org

**Case #:** 8188318

**Consumer Info:** Tufenkian, Jeffrey  
PO Box 97  
Portland , OR 97207  
5039541691  
jeffrey\_tufenkian@yahoo.com

**Business Info:** Trump University  
40 Wall Street, 32nd Floor  
New York, NY 10005  
8888265953  
<http://www.trumpuniversity.com>

**Date Filed:** 7/6/2011

**Nature of the Complaint:** Contract Issues

**Consumer's Original Complaint:**

Consumer States: The Trump University "Gold Elite" program completely failed to live up to its promises, and therefore I requested a full refund, but as of this date, there has been no refund or satisfactory response to my letters and calls. I attended the Portland, Oregon foreclosure training lead by James Harris in April 2008 (for which I paid \$1995). At the end of the training we signed up and paid for the "Gold Elite" package for an additional \$34,995 based on the promises it would successfully launch our real estate investment business through the specific promised deliverables primarily of the mentorship. Promises of mentoring from the Foreclosure training included: The trainer (James Harris) saying that the mentor will walk us through the first deal to completion. James said specifically, "during the mentorship visit Rick (McNally) will: 1. help walk you through, run numbers and analyze properties, 2. write offers, go to contract on properties; 3. will interview sellers, attorneys, and others; 4. will help you write multiple contracts to purchase several properties at the same time; and 5. will set you up with a lifelong investor plan." James continued to say that, "90 days after the 3 day visit, there will be a follow up with Rick and James to help make sure it (your first property) gets sold." The staff only fulfilled 1 of these promised deliverables, After my letters and calls failed to bring a desired result (refund), I have recently engaged an attorney who wrote Trump University in March of 2009 reiterating my complaint and demand for refund. Trump University has failed to respond within the specified timeframe of the letter.

**Consumer's Desired Resolution:**

See Complaint Text

000367



**Business/Consumer Response & Rebuttals:**

**05/19/2010**

**Jeffrey Tufenkian**

The business's response does not resolve my complaint.

Better Business Bureau:

I have reviewed the response made by the business in reference to complaint ID# 8188318, and have determined that this does not resolve my complaint.

To assist the BBB in bringing this matter to a close, please explain why this does not resolve your complaint:

Please see attached.

Sincerely,

Jeffrey Tufenkian

---

**06/11/2010**

**Jeffrey Tufenkian**

The business has not responded to me directly

Better Business Bureau:

At this time, I have not been contacted by Trump University regarding complaint ID 8188318.

Sincerely,

Jeffrey Tufenkian

---

**10/16/2010**

**Jeffrey Tufenkian**

The business has not responded to me directly

Better Business Bureau:

At this time, I have not been contacted by Trump University regarding complaint ID 8188318.

Sincerely,

Jeffrey Tufenkian

---

**05/12/2011**

**Mark Covais**

Respond to Complaint

Mr. Tufenkian as you are aware was a student of The Trump Entrepreneur Initiative, formerly known as Trump University. As Mr. Tufenkian described, he enrolled in and consumed services related to training and education. At the time the services were presented, they were completely and accurately described as education, focusing on real estate and supporting skills like research, marketing, and financial analysis as a few examples. The Trump Entrepreneur Initiative completely fulfilled its obligations according to the contract, and Mr. Tufenkian received all of the education as described. Additionally, Mr. Tufenkian completed a survey showing complete satisfaction with his training which attests to the assertion that services were delivered. For your convenience, the survey is attached.

Thank you,

Mark Covais

The Trump Entrepreneur Initiative

40 Wall Street, 32nd Floor

New York, NY 10005

---

**05/24/2011**

**Jeffrey Tufenkian**

The business's response does not resolve my complaint.

Better Business Bureau:

I have reviewed the response made by the business in reference to complaint ID# 8188318, and have determined that this does not resolve my complaint.

To assist the BBB in bringing this matter to a close, please explain why this does not resolve your complaint:

Contrary to Mr. Covais' claim, Trump University completely failed to fulfill its obligations to me. As I have stated in my letters, they made many specific promises and failed to deliver on those promises. Unfortunately, Trump "university" duped thousands of consumers into paying them huge sums of money for empty promises. For that reason the national class action suit against them

000369

is moving forward, the NY Dept of Education forced them to change their name, and just this month the NY Attorney General's office began investigating them (see a few examples attached here or do a web search for and find dozens and dozens of recent articles in the news media throughout the US on this).

In regards to this evaluation: 1)the trainer made it extremely clear he would not leave unless I gave him all "5"s, 2)he made me fill the evaluation out in front of him before the training was over, 3)I was still under the false hopefulness that what he said was true and (among many other things) that I could qualify for a loan from his person and move forward as he suggested (this was proved false the next two days), 4)Trump "University" seemed to anticipate the fact that people would be offended when they discovered that what they paid \$35,000 for was out-dated, often illegal, inappropriate for their local area, generally useless "training" that had less content than a few library books and a lunch with a local realtor. For that reason, they seem to focus heavily on orchestrating positive-sounding evaluations from students under the close observation of Trump trainers BEFORE the students went out and to see how wrong and useless the material they had been given was.

One practice they seemed particularly fond of was during the first training having students get credit card companies to raise their credit limits in order to "buy real estate", but then two days later to pressure the students to max out the new high limits by paying for their expensive scam "training". I unfortunately took this bait and maxed out two cards that—three years later—I am still paying hundreds of dollars in interest on every month.

Signing up for the Trump "university" lies was the worst mistake I have ever made. Please do whatever you can to stop the lies of this organization and stop them from ripping off more unsuspecting consumers of their life savings.

What Trump "university" does well is sell their program and try to protect their lies from being challenged. When their orchestrated evaluations and bullying consumers who complain to them fail, they turn to intimidation. Mr. Trump even had the audacity to slap a \$100 million counter suit on the lead plaintiff in the class action suit for exposing the truth about Trump "university" and its deceptive practices. The chilling implications were not lost on him, I'm sure.

It is my personal hope that if Mr. Trump does not quickly choose to see the benefit of restoring his reputation by compensating all of those he has ripped-off (which I'm not holding my breath for), that he (and his minions doing his dirty work for him) will soon be forced to refund us including sufficient penalties to incent him and his companies to never

undertake such deceptive practices in the future.

Thank you for your attention in this matter. Please contact me if you have any further questions or want any further information.

Sincerely,

Jeffrey Tufenkian

PO Box 97

Portland, OR 97207

---

**06/10/2011**

**Mark Covais**

Respond to Complaint

The Trump Entrepreneur Initiative is now, and has always been committed to our customer's satisfaction. We will always go to great lengths to resolve any and all of our customer's complaints. That high standard of customer care goes for Mr. Tufenkian's situation as well.

Our records indicate that we have been aggressively trying to work towards a resolution with Mr. Tufenkian for years, going back as far as December of 2008 when he first lodged a complaint. It is also important to note that from April 13th 2008 until that December, Mr. Tufenkian attended and took advantage of retreats, online courses, phone coaching and his field mentorship, every step of the way giving favorable reviews.

The fact that Mr. Tufenkian insinuates that he was forced into giving all 5's by his mentor is not only ridiculous but an outright lie! As proof I would like to call attention to the attached mentorship evaluation form question five. Not only did Mr. Tufenkian give all 5's, he described his experience as "EXCELLENT" and was so pleased with it he went on to use and underline four "very" s in his description.

Even though Mr. Tufenkian enjoyed eight months worth of our services, once he indicated his dissatisfaction we exhausted every reasonable solution to make him happy. We offered free coaching, another mentorship, and additional retreats. After months of trying to accommodate Mr. Tufenkian we even went as far as to offer a partial refund to be amicable in April 09'.

It is with this history in mind and after reviewing Mr. Tufenkian's most current Better Business Bureau response that we take issue with his statements and the use of this process. We find the statements to be grossly inaccurate and slanderous. We also take them as proof positive that he is not really interested in coming to any kind of resolution. We believe that Mr. Tufenkian is using the Better Business Bureau and its mediation platform to promote and further his own agenda. Most importantly The Trump Entrepreneur Initiative feels that his motivation is a financial decision rather than any dissatisfaction with our services. Although we earnestly would

000371

like to resolve Mr. Tufenkian's complaint, we truly don't see him ever legitimately giving us the opportunity. With that in mind we respectfully ask that the Better Business Bureau close Mr. Tufenkian's complaint with our company permanently and remove his means grandstand.

---

**07/06/2011**  
**Jeffrey Tufenkian**

The business's response does not resolve my complaint.  
Better Business Bureau:

I have reviewed the response made by the business in reference to complaint ID# 8188318, and have determined that this does not resolve my complaint.

To assist the BBB in bringing this matter to a close, please explain why this does not resolve your complaint:

Below please find the most recent message from the business and below that, my current response to you on this case (#8188318).

Their posture has been belligerent towards those who have raised problems about their services from the beginning which is somewhat evident even here in their recent response. What happens if the correspondence seems to go back and forth with no seeming resolution as has been the situation with this case? At what point do you get involved to try to help resolve the dispute?

Please let me know if you have any questions or need further information.

Thank you.

Best regards,

Jeffrey

Jeffrey Tufenkian

jeffrey\_tufenkian@yahoo.com

h/o: 503.954.1691

f: 503.954.1628

PO Box 97

Portland, OR 97207

Case ID #8188318

000372

MESSAGE FROM BUSINESS:

The Trump Entrepreneur Initiative is now, and has always been committed to our customer's satisfaction. We will always go to great lengths to resolve any and all of our customer's complaints. That high standard of customer care goes for Mr. Tufenkian's situation as well.

Our records indicate that we have been aggressively trying to work towards a resolution with Mr. Tufenkian for years, going back as far as December of 2008 when he first lodged a complaint. It is also important to note that from April 13th 2008 until that December, Mr. Tufenkian attended and took advantage of retreats, online courses, phone coaching and his field mentorship, every step of the way giving favorable reviews.

The fact that Mr. Tufenkian insinuates that he was forced into giving all 5's by his mentor is not only ridiculous but an outright lie! As proof I would like to call attention to the attached mentorship evaluation form question five. Not only did Mr. Tufenkian give all 5's, he described his experience as "EXCELLENT" and was so please with it he went on to use and underline four "very" s in his description.

Even though Mr. Tufenkian enjoyed eight months worth of our services, once he indicated his dissatisfaction we exhausted every reasonable solution to make him happy. We offered free coaching, another mentorship, and additional retreats. After months of trying to accommodate Mr. Tufenkian we even went as far as to offer a partial refund to be amicable in April 09'.

It is with this history in mind and after reviewing Mr. Tufenkians most current Better Business Bureau response that we take issue with his statements and the use of this process. We find the statements to be grossly inaccurate and slanderous. We also take them as proof positive that he is not really interested in coming to any kind of resolution. We believe that Mr. Tufenkian is using the Better Business Bureau and its mediation platform to promote and further his own agenda. Most importantly The Trump Entrepreneur Initiative feels that his motivation is a financial decision rather than any dissatisfaction with our services. Although we earnestly would like to resolve Mr. Tufenkians complaint, we truly don't see him ever legitimately giving us the opportunity. With that in mind we respectfully ask that the Better Business Bureau close Mr. Tufenkians complaint with our company permanently and remove his means grandstand.

My reply to BBB based on this response from Trump "university":

This case is in no way resolved.

I actually appreciate this response from Trump "university" as it illustrates their approach to blame those who have been ripped-off by them rather than seriously deal with their faults and try to reasonably settle the case. Rather than attempt to legitimately resolve the dispute, they choose instead to falsely claim their past actions were "aggressive" efforts to satisfy my concerns, and now they claim I am a liar and a slanderer. In fact, they blamed me initially, then tried to appease me by throwing more of their unsatisfactory so-called "training" at me, and eventually—after much persistence on my part—they offered this "partial refund" which was less than 10% of my costs for their training and related expenses. That was, and still is, far from satisfactory.

As for their claims of me lying and slandering them, I defer to the facts of the case, which support my position.

It is clearly their choice to prolong this case, as I have made it very clear in my correspondence that what I seek is a refund of the money I have paid for their so-called program and related costs, which now stands at about \$80,000. Of course, it was much less when I originally brought this to their attention and requested a refund two and a half years ago, and even receiving this amount will in no way fully compensate my family for these years of distress that we have suffered as a result of making the grand mistake of trusting and believing the words of Trump "university" representatives and signing up for their so-called program.

I am now, as I have always been, ready to receive a sincere settlement to finally resolve this case.

Thank you.

Sincerely,

Jeffrey Tufenkian

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# Exhibit L43



*Charles S. Spencer*  
*Attorney at Law*

1100 Baltimore Blvd, College Park, Md. 20740  
201 277-0196

March 16, 2009

Mr. Donald J. Trump, Chairman  
The Trump Institute  
40 Wall Street  
New York, New York 10005

RE: David L. Wyche \$1,997.94 Return Authorization Number DCA 12050856SOJ

Dear Mr. Trump:

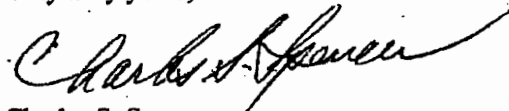
On December 7, 2008, Mr. David L. Wyche and his wife Cynthia paid \$1,997.94 for a Wealth Building Weekend Training Course and course material. Your notice of cancellation states that Mr. and Mrs. Wyche could cancel this transaction with out any penalty or obligation within 3 business days from December 7, 2008.

The cancellation was called in on December 8, 2008. The payment return authorization number was issued on December 8, 2008. Your company said your materials were to be picked up by UPS from the Wyches'. This never happened. Mrs. Wyche shipped the Institute materials to you via U.S. Postal Service insured mail with signature confirmation on January 2, 2009. Confirmation of receipt of delivery to Rochester, New York was rendered on January 4, 2009.

Eighteen telephone calls have been made by Mrs. Wyche and this office and as many promises have been made by your representatives that your check was in the mail. As of today, the refund check has not been received.

Several Internet reports have complained of the same treatment by your Institute in refusing to make appropriate refunds. Demand is hereby made for the immediate payment of the promised Mr. and Mrs. Wyche refund.

Very truly yours,

  
Charles S. Spencer

cc: Mr. & Mrs. David L. Wyche  
Better Business Bureau of Greater Maryland  
Maryland Office of the Attorney General  
Better Business Bureau Serving Metropolitan New York  
New York Office of the Attorney General

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