

May 20, 2022

Via NYSCEF

Hon. Arthur F. Engoron, J.S.C.
Supreme Court of the State of New York
60 Centre Street, Room 519
New York, NY 10007

Re: *People v. Trump, et al.*
Index No.: 451685/2020

Dear Judge Engoron,

This office represents the respondent, Donald J. Trump (“Respondent”) in the above-referenced matter. In accordance with the Decision and Order dated May 11, 2022 (the “Order”) (NYSCEF No. 778), enclosed herein, please find the following:

1. Affirmation of Michael T. Madaio dated 5/20/2022;
2. Affidavit of Peter W. Gabra dated 5/18/2022;
3. Affidavit of Randee S. Ingram dated 5/18/2022;
4. Affidavit of Nasyia Drayton dated 5/18/2022;
5. Affidavit of Alan Garten dated 5/19/2022
6. Affidavit of Adam Rosen dated 5/18/2022;
7. Affidavit of Owen Reidy dated 5/18/2022;
8. Affidavit of Cynthia Arce dated 5/18/2022;
9. Affidavit of Meredith McIver dated 5/19/2022;
10. Affidavit of Rhona Graff dated 5/20/2022
11. Affidavit of Ronald P. Fischetti dated 5/19/2022;
12. Affirmation of Lawrence Rosen dated 5/20/2022;
13. Affirmation of Amy Carlin dated 5/20/2022; and
14. Affidavit of Michael van der Veen dated 5/20/2022.

Pursuant to the Order, our office has received confirmation that HaystackID submitted its report to the Office of the New York State Attorney General (the “OAG”) on May 19, 2022 and certified that its review is complete and that all responsive documents have been accounted for, located, and turned over to the OAG. Our office has further confirmed that Respondent effectuated a wire transfer of \$110,000 to the OAG on May 19, 2022, which, pursuant to the Order, shall be held in escrow pending the final disposition of Respondent’s appeal of this Court’s contempt order before the Appellate Division, First Department.

Accordingly, we respectfully request that this Court find that Respondent has satisfied all conditions set forth in the Order.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read 'Alina Habba', with a long, sweeping horizontal flourish extending to the right.

Alina Habba, Esq.
For Habba Madaio & Associates LLP

Enclosures

cc: Kevin Wallace (kevin.wallace@ag.ny.gov)
Colleen Faherty (colleen.faherty@ag.ny.gov)

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

PEOPLE OF THE STATE OF NEW YORK, by
LETITIA JAMES, Attorney General of the State
of New York,

Petitioner,

v.

THE TRUMP ORGANIZATION, INC., DJT
HOLDINGS LLC, DJT HOLDINGS
MANAGING MEMBER LLC, SEVEN
SPRINGS LLC, ERIC TRUMP, CHARLES
MARTABANO, MORGAN, LEWIS &
BOCKIUS, LLP, SHERI DILLON, DONALD J.
TRUMP, IVANKA TRUMP, DONALD
TRUMP, JR., and CUSHMAN AND
WAKEFIELD, INC.,

Respondents.

Index No.: 451685/2020

AFFIRMATION OF
MICHAEL T. MADAIO

I, Michael T. Madaio, Esq., an attorney duly licensed to practice law in the State of New York, do hereby affirm as follows:

1. I am a partner with the law firm of Habba Madaio & Associates LLP with an office located at 1430 US Highway 206, Suite 240, Bedminster New Jersey 07921.

2. My office represents the respondent, Donald J. Trump (“Respondent”), in connection with the above referenced action and was and is responsible for preparing and assembling Respondent’s production and responses to the *Subpoena Duces Tecum* dated December 1, 2021 (the “Subpoena”). My office also represents the respondent, The Trump Organization, Inc. (the “Trump Organization”) in this action.

3. Incorporated herein by reference is Respondent’s Supplemental Submission, dated May 6, 2022 (NYSCEF No. 769).

4. I submit this affirmation in accordance with the Order of the Hon. Arthur Engoron, J.S.C. dated May 11, 2022 (the “May 11 Order”), which directed Respondent to satisfy the following conditions on or before May 20, 2022:

- (1) “Respondent submits affidavits from any person upon whom respondent, or his counsel, relied on in submitting their prior sworn “Jackson affidavits” of May 6, 2022, including, without limitation, Alan Garten, Cynthia Arce, Maria Enriquez, Owen Reidy, Peter W. Gabra, Randee Ingram, Na’syia Drayton, Ronald P. Fischetti, Michael T. Van der Veen, Lawrence Rosen, and Amy Carlin;” and
- (2) “Respondent submits an affidavit(s) from the executive assistant(s) referenced in Respondent’s May 6, 2022 affidavit that details the executive assistant(s) retention and preservation practice for respondent’s documents;” and
- (3) “Haystack ID submits its report on Respondent’s subpoena compliance and certifies that its review is complete and that all responsive documents have been accounted for, located, and turned over to petitioner;” and
- (4) “Respondent pays the contempt fine currently due and owing, \$110,000 (from April 26, 2022 through May 6, 2022), to petitioner, to be held in petitioner’s escrow account pending the final disposition of respondent’s appeal of this Court’s contempt order before the Appellate Division, First Department.”

5. With respect to paragraph (1) of the May 11 Order, submitted herewith are affidavits from Alan Garten, Cynthia Arce, Owen Reidy, Adam Rosen, Peter W. Gabra, Randee Ingram, Nasyia Drayton, Ronald P. Fischetti, Lawrence Rosen, Amy Carlin, and Michael T. van der Veen. Maria Enriquez is no longer employed by the Trump Organization and attempts by my office to contact her were unsuccessful.

6. With respect to Paragraph (2) of the May 11 Order, my May 6, 2022 affidavit identified the following thirteen (13) individuals as having been employed by the Trump Organization as executive assistants for Respondent: Jessica Macchia, Chelsea Frommer, Holly Lorenzo, Kelly Malley, Katie Murphy, Kelli Rose, Thuy Colayco, Cammie Artusa, Randi Gleason, Lauren Kelly, Casey Kennedy, Rhona Graff, and Jaquiline Fini (collectively, the “Executive Assistants”). Submitted herewith are affidavits from Rhona Graff and Meredith McIver. The other twelve (12) Executive Assistants are no longer employed by the Trump Organization and attempts by my office to contact them to obtain an affidavit were unsuccessful.

7. With respect to Paragraph (3) of the May 11 Order, my office has received confirmation that HaystackID submitted its report to the New York State Office of the Attorney General (“OAG”) on May 19, 2022, and based on my review of this report, I understand that HaystackID did not identify any responsive custodial documents of Respondent other than the Chron files that were previously produced to the OAG.

8. With respect to Paragraph (4) of the May 11 Order, my office has confirmed that Respondent effectuated a wire transfer of \$110,000 to the OAG on May 19, 2022, which, pursuant to the Order, shall be held in escrow pending the final disposition of Respondent’s appeal of this Court’s contempt order before the Appellate Division, First Department.

Dated: New York, New York
May 20, 2022



Michael T. Madaio, Esq.

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

PEOPLE OF THE STATE OF NEW YORK, by
LETITIA JAMES, Attorney General of the State
of New York,

Index No.: 451685/2020

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THE TRUMP ORGANIZATION, INC., DJT
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MANAGING MEMBER LLC, SEVEN
SPRINGS LLC, ERIC TRUMP, CHARLES
MARTABANO, MORGAN, LEWIS &
BOCKIUS, LLP, SHERI DILLON, DONALD J.
TRUMP, IVANKA TRUMP, DONALD
TRUMP, JR., and CUSHMAN AND
WAKEFIELD, INC.,

AFFIDAVIT OF
PETER W. GABRA

Respondents.

I, Peter W. Gabra, Esq., being duly sworn, deposes and says:

1. I am an associate with the law firm Habba Madaio & Associates LLP (the "Firm") with an office located at 1430 U.S. Highway 206, Suite 240, Bedminster, New Jersey 07921. The Firm represents the respondents, Donald J. Trump ("Respondent") and The Trump Organization, (the "Trump Organization") in the above captioned matter.

2. I submit this affidavit in accordance with the Order of the Hon. Arthur Engoron, J.S.C. dated May 11, 2022.

3. In response to the December 1, 2021 subpoena (the "Subpoena") served on Respondent by the Office of the New York State Attorney General (the "OAG"), on or about March 2022, I, at the direction and under the guidance of the Firm's partners, Alina Habba and Michael T. Madaio, working with two of my colleagues, Randee Ingram (paralegal) and Nasyia

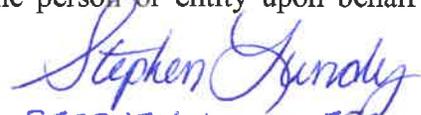
Drayton (paralegal), performed a diligent, complete and comprehensive search of 1,346 documents¹ and/or correspondence which relate to item seven (7) of the Subpoena in an attempt to locate any documents responsive to the Subpoena. After reviewing said documents, I was unable to locate any responsive documents.

4. I further reviewed: (i) relevant portions of Respondent's 'chron' files; (ii) prior document productions produced by the Trump Organization to the OAG; and (iii) attorney work product provided by Trump Organization's Co-Counsel relating to the documents produced by the Trump Organization to the OAG in furtherance of my search efforts. After review, no responsive documents were located.


Peter W. Gabra, Esq.

STATE OF *NEW JERSEY*)
COUNTY OF *SOMERSET*)

On this 18 day of May in the year 2022, before me, the undersigned, a notary public in and for said state, personally appeared Peter W. Gabra personally known to be or proved to me on the basis of satisfactory evidence to be the individual whose name is subscribed to the within instrument and acknowledged to me that he executed the same in his capacity, and that by his signature on the instrument, the individual, or the person or entity upon behalf of which the individual acted, executed the instrument.


STEPHEN LUNDY, ESQ.
NJ BAR ID: 084672014
Notary Public

¹ As referenced and more fully described in the Affidavit of Michael T. Madaio, ¶57 dated May 6, 2022.

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

PEOPLE OF THE STATE OF NEW YORK, by
LETITIA JAMES, Attorney General of the State
of New York,

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THE TRUMP ORGANIZATION, INC., DJT
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MANAGING MEMBER LLC, SEVEN
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TRUMP, IVANKA TRUMP, DONALD
TRUMP, JR., and CUSHMAN AND
WAKEFIELD, INC.,

Respondents.

Index No.: 451685/2020

AFFIDAVIT OF
RANDEE S. INGRAM

I, Randee S. Ingram, being duly sworn, deposes and says:

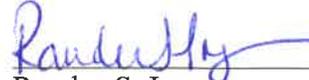
1. I am a paralegal with the law firm of Habba Madaio & Associates LLP (the "Firm") with an office located at 1430 US Highway 206, Suite 240, Bedminster, New Jersey 07921. The Firm represents the respondent, Donald J. Trump ("Respondent") and The Trump Organization (the "Trump Organization") in the above captioned matter.

2. I submit this affidavit in accordance with the Order of the Hon. Arthur Engoron, J.S.C. dated May 11, 2022.

3. In response to the December 1, 2021 subpoena (the "Subpoena") served on Respondent by the Office of the New York State Attorney General (the "OAG"), in or around March of 2022, I, at the direction and under the guidance of the Firm's partners, Alina Habba and Michael T. Madaio, working with two of my colleagues, Peter W. Gabra (associate) and Nasyia

Drayton (paralegal), performed a diligent, complete and comprehensive search of 1,346 documents¹ and/or correspondence which relate to item seven (7) of the Subpoena in an attempt to locate any documents responsive to the Subpoena.

4. I also reviewed relevant portions of Respondent's 'chron' files to determine whether there were any documents relating to the Subpoena.


Randee S. Ingram

STATE OF *New Jersey*)
COUNTY OF *Somerset*)

On this 18 day of May in the year 2022, before me, the undersigned, a notary public in and for said state, personally appeared Randee S. Ingram personally known to me or proved to me on the basis of satisfactory evidence to be the individual whose name is subscribed to the within instrument and acknowledged to me that she executed the same in her capacity, and that by her signature on the instrument, the individual, or the person or entity upon behalf of which the individual acted, executed the instrument.


Notary Public



¹ As referenced and more fully described in the Affidavit of Michael T. Madaio, ¶57 dated May 6, 2022.

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

PEOPLE OF THE STATE OF NEW YORK, by
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of New York,

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THE TRUMP ORGANIZATION, INC., DJT
HOLDINGS LLC, DJT HOLDINGS
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MARTABANO, MORGAN, LEWIS &
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TRUMP, IVANKA TRUMP, DONALD
TRUMP, JR., and CUSHMAN AND
WAKEFIELD, INC.,

Respondents.

Index No.: 451685/2020

AFFIDAVIT OF
NASYIA DRAYTON

I, Nasyia Drayton, being duly sworn, deposes and says:

1. I am a paralegal with the law firm of Habba Madaio & Associates LLP (the “Firm”) with an office located at 1430 U.S. Highway 206, Suite 240, Bedminster, New Jersey 07921. The Firm represents the respondents, Donald J. Trump (“Respondent”) and the Trump Organization (the “Trump Organization”) in the above captioned matter.

2. I submit this affidavit in accordance with the Order of the Hon. Arthur Engoron, J.S.C. dated May 11, 2022.

3. In response to the December 1, 2021 subpoena (the “Subpoena”) served on Respondent by the Office of the New York State Attorney General (the “OAG”), on or about March 2022, I, at the direction and under the guidance of the Firm’s partners, Alina Habba, Esq. and Michael T. Madaio, Esq., working with two of my colleagues, Peter W. Gabra, Esq. (associate)

and Randee Ingram (paralegal), performed a diligent, complete and comprehensive search of 1,346 documents¹ and/or correspondence which relate to item seven (7) of the Subpoena in an attempt to locate any documents responsive to the Subpoena.


Nasyia Drayton

STATE OF NEW JERSEY)
COUNTY OF SOMERSET)

On this 18 day of May in the year 2022, before me, the undersigned, a notary public in and for said state, personally appeared Nasyia Drayton personally known to me or proved to me on the basis of satisfactory evidence to be the individual whose name is subscribed to the within instrument and acknowledged to me that she executed the same in her capacity, and that by her signature on the instrument, the individual, or the person or entity upon behalf of which the individual acted, executed the instrument.


Notary Public



¹As referenced and more fully described in the Affidavit of Michael T. Madaio, Esq. ¶57 dated May 6, 2022.

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

PEOPLE OF THE STATE OF NEW YORK, by
LETITIA JAMES, Attorney General of the State
of New York,

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MARTABANO, MORGAN, LEWIS &
BOCKIUS, LLP, SHERI DILLON, DONALD J.
TRUMP, IVANKA TRUMP, DONALD
TRUMP, JR., and CUSHMAN AND
WAKEFIELD, INC.,

AFFIDAVIT OF ALAN GARTEN

Respondents.

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

I, Alan Garten, Esq., being duly sworn, deposes and says:

1. I am General Counsel to The Trump Organization (the “Company”) with an office located at 725 Fifth Avenue, New York, New York (“Trump Tower”).

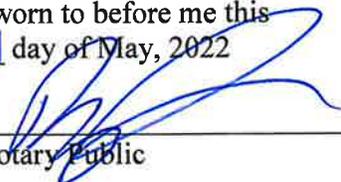
2. In response to various subpoenas (the “Company Subpoenas”) served on the Company by the Office of the New York State Attorney General (the “OAG”), I, working in coordination with the Company’s outside counsel and other members of the Company’s legal department, made or caused to be made a diligent, complete and comprehensive search for all documents and information requested by the Company Subpoenas.

3. In addition to working on the Company Subpoenas, I also assisted respondent Donald J. Trump's ("Respondent") counsel, Habba Madaio & Associates LLP, in responding to the OAG's December 1, 2021 subpoena to Respondent ("Respondent's Subpoena"). These efforts included (i) assisting Respondent's counsel in determining whether the Company was in possession, custody or control of any documents responsive to Respondent's Subpoena that had not already been produced to the OAG in response to the Company Subpoenas; and (ii) conducting a thorough and complete search of Respondent's Trump Tower residence on May 5, 2022 for any additional documents and information responsive to Respondent's Subpoena.

4. I understand that the Court has ordered Respondent to submit affidavits from his former executive assistants and those individuals whom his counsel relied on in submitting their prior "Jackson affidavits". I also understand that affidavits from Adam Rosen, Owen Reidy, Cynthia (Arce) Garcia, Meredith McIver and Rhona Graff (a former employee of the Company) are being submitted herewith. The rest of the executive assistants and Company employees whom Respondent's counsel relied on in submitting their prior "Jackson affidavits" are no longer employed by the Company.



Alan Garten

Sworn to before me this
19 day of May, 2022


Notary Public

RICHARD HENRY SCHOONEWOLFF
Notary Public, State of New York
No. 01SC6405745
Qualified in New York County
Commission Expires March 16, 2024

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

PEOPLE OF THE STATE OF NEW YORK, by
LETITIA JAMES, Attorney General of the State
of New York,

Petitioner,

v.

THE TRUMP ORGANIZATION, INC., DJT
HOLDINGS LLC, DJT HOLDINGS
MANAGING MEMBER LLC, SEVEN
SPRINGS LLC, ERIC TRUMP, CHARLES
MARTABANO, MORGAN, LEWIS &
BOCKIUS, LLP, SHERI DILLON, DONALD J.
TRUMP, IVANKA TRUMP, DONALD
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WAKEFIELD, INC.,

Respondents.

Index No.: 451685/2020

AFFIDAVIT OF ADAM ROSEN

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

I, Adam Rosen, being duly sworn, deposes and says:

1. I am an Assistant General Counsel with The Trump Organization (the “Company”) with an office located at 725 Fifth Avenue, New York, New York (“Trump Tower”).

2. In response to various subpoenas (the “Company Subpoenas”) served on the Company by the Office of the New York State Attorney General (the “OAG”), in or around January, 2020, I, at the request of the Company’s general counsel and outside counsel, working together with two of my former colleagues at the Company, Alex Cannon (Assistant General Counsel) and Maria Enriquez (Paralegal), performed a diligent, complete and comprehensive search of the Company’s off-site storage inventories in an attempt to locate any files that may contain documents responsive to the Company Subpoenas.

3. The files that were identified as potentially containing responsive documents were then requested from the off-site storage facility and shipped to the Company's offices at Trump Tower where I understand they were reviewed.



Adam Rosen

Sworn to before me this
16 day of May, 2022



Notary Public

RICHARD HENRY SCHOONEWOLFF
Notary Public, State of New York
No. 01SC6405745
Qualified in New York County
Commission Expires March 16, 2024

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

PEOPLE OF THE STATE OF NEW YORK, by
LETITIA JAMES, Attorney General of the State
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Index No. 451685/2020

Petitioner,

v.

AFFIDAVIT OF OWEN REIDY

THE TRUMP ORGANIZATION, INC., DJT
HOLDINGS LLC, DJT HOLDINGS
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SPRINGS LLC, ERIC TRUMP, CHARLES
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BOCKIUS, LLP, SHERI DILLON, DONALD J.
TRUMP, IVANKA TRUMP, DONALD
TRUMP, JR., and CUSHMAN AND
WAKEFIELD, INC.,

Respondents.

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

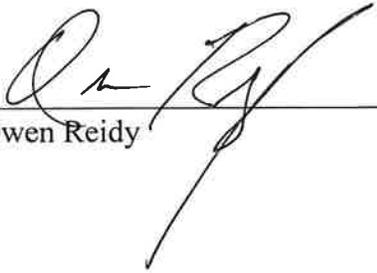
I, Owen Reidy, being duly sworn, deposes and says:

1. I am an Assistant General Counsel with The Trump Organization (the “Company”) with an office located at 725 Fifth Avenue, New York, New York (“Trump Tower”).

2. In response to various subpoenas (the “Company Subpoenas”) served on the Company by the Office of the New York State Attorney General (the “OAG”), on or about July 19, 2021, I, at the request of the Company’s outside counsel, performed a diligent, complete and comprehensive search of the following locations:

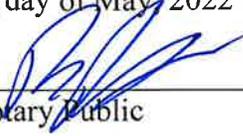
- a. the file cabinets located outside of Donald J. Trump’s (“Respondent”) office on the 26th floor of Trump Tower; and
- b. the chron files and calendars located in the executive office storage room outside of Respondent’s office on the 26th floor of Trump Tower.

3. After completing these searches, I reported my findings and turned over any relevant documents to the Company's general counsel and outside counsel.



Owen Reidy

Sworn to before me this
18 day of May, 2022



Notary Public

RICHARD HENRY SCHOONEWOLFF
Notary Public, State of New York
No. 01SC6405745
Qualified in New York County
Commission Expires March 16, 2024

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

PEOPLE OF THE STATE OF NEW YORK, by
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WAKEFIELD, INC.,

Respondents.

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AFFIDAVIT OF CYNTHIA GARCIA

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

I, Cynthia Garcia, being duly sworn, deposes and says:

1. I am a Paralegal with The Trump Organization (the “Company”) with an office located at 725 Fifth Avenue, New York, New York (“Trump Tower”).

2. In response to various subpoenas (the “Company Subpoenas”) served on the Company by the Office of the New York State Attorney General (the “OAG”), I, at the request of the Company’s outside counsel, performed a diligent, complete and comprehensive search of the following locations:

- a. on or about November 12, 2021, I searched (i) the file cabinets and (ii) the chron files and calendars in the executive office storage room, located outside of Donald J. Trump’s (“Respondent”) office on the 26th floor of Trump Tower;
- b. on or about November 12 and 23, 2021, I searched the desks and desk drawers of Respondent’s former assistants located outside of Respondent’s office on the 26th floor of Trump Tower; and

c. on or about November 23, 2021, I searched the off-site storage logs for any files maintained by any of Respondent's former assistants.

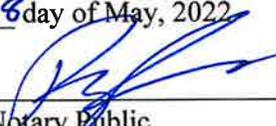
3. After completing these searches, I reported my findings and turned over any relevant documents to the Company's general counsel and outside counsel.



Cynthia Garcia

Sworn to before me this

16 day of May, 2022.



Notary Public

RICHARD HENRY SCHOONEWOLFF
Notary Public, State of New York
No. 01SC6405745
Qualified in New York County
Commission Expires March 16, 2024

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

PEOPLE OF THE STATE OF NEW YORK, by
LETITIA JAMES, Attorney General of the State
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THE TRUMP ORGANIZATION, INC., DJT
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TRUMP, IVANKA TRUMP, DONALD
TRUMP, JR., and CUSHMAN AND
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Respondents.

Index No. 451685/2020

AFFIDAVIT OF MEREDITH MCIVER

I, Meredith McIver, being duly sworn, deposes and says:

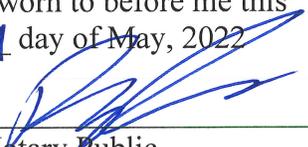
1. I work as a Property Administrator for The Trump Organization (the "Company") with an office located at 725 Fifth Avenue, New York, New York ("Trump Tower").
2. From approximately 2001-2003, I served as an assistant to respondent Donald J. Trump's ("Respondent") Executive Assistant, Norma Foerderer.
3. In or about 2003 and/or 2004, I was promoted to the position of Staff Writer.
4. In or about 2020, I transitioned from Staff Writer to my current role as a Property Administrator for the Company.

5. While I was not one of Respondent's assistants, to the best of my knowledge, Respondent's documents (including his "chron file") were stored in the file cabinets and executive office storage room outside of Respondent's office on the 26th floor of Trump Tower. It is my understanding that these files have all been preserved and remain in the same locations to date.



Meredith McIver

Sworn to before me this
19 day of May, 2022



Notary Public

RICHARD HENRY SCHOONEWOLFF
Notary Public, State of New York
No. 01SC6405745
Qualified in New York County
Commission Expires March 16, 2024

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

PEOPLE OF THE STATE OF NEW YORK, by LETITIA JAMES, Attorney General of the State of New York, Petitioner, v. THE TRUMP ORGANIZATION, INC., DJT HOLDINGS LLC, DJT HOLDINGS MANAGING MEMBER LLC, SEVEN SPRINGS LLC, ERIC TRUMP, CHARLES MARTABANO, MORGAN, LEWIS & BOCKIUS, LLP, SHERI DILLON, DONALD J. TRUMP, IVANKA TRUMP, DONALD TRUMP, JR., and CUSHMAN AND WAKEFIELD, INC., Respondents.	Index No. 451685/2020 <u>AFFIDAVIT OF RHONA GRAFF</u>
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I, Rhona Graff, being duly sworn, deposes and says:

1. I was formerly employed as an executive assistant to Donald J. Trump ("Respondent") with The Trump Organization (the "Company") with an office located at 725 Fifth Avenue, New York, New York ("Trump Tower"). I left the Company in April 2021.

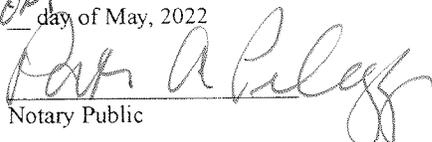
2. During my employment with the Company, I had the following retention and preservation practices for Respondent's documents, files and/or records:

a. I, as well as other executive assistants, was responsible for handling, maintaining and keeping Respondent's hard copy calendars and his electronic calendar. Hard copies of the calendar were kept on Respondent's desk during the calendar year and at the conclusion of the year were moved to my office. After Respondent left the the Company and moved to the Washington, D.C., I moved the calendars to a closet outside of Respondent's office. To the best of my knowledge, there was no policy for disposing of outdated hard copy calendars. I do not have any knowledge of the IT department's retention policy for storing data on the electronic calendar. Other than deleting calendar entries when appointments were moved or cancelled, I did not have a personal practice of deleting any old or outdated electronic calendar entries.

b. I had a practice of storing any letters written by Respondent that were provided to me in Respondent's "chron" files. The "chron" files were stored in file cabinets in the Company's offices in the Trump Tower. After Respondent left the Trump Organization and moved to Washington, D.C., I moved the chron files to the closet outside of Respondent's Office. To the best of my knowledge, there was no policy of disposing of the "chron" files or any of the documents contained therein.


Rhona Graff

Sworn to before me this
20th day of May, 2022


Notary Public

Patricia A. Pileggi
NOTARY PUBLIC, STATE OF NEW YORK
Registration No. 02PI6127465
Qualified in Kings County
Commission Expires November 8, 2025

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

PEOPLE OF THE STATE OF NEW YORK, by
LETITIA JAMES, Attorney General of the State
of New York,

Petitioner,

v.

THE TRUMP ORGANIZATION, INC., DJT
HOLDINGS LLC, DJT HOLDINGS
MANAGING MEMBER LLC, SEVEN
SPRINGS LLC, ERIC TRUMP, CHARLES
MARTABANO, MORGAN, LEWIS &
BOCKIUS, LLP, SHERI DILLON, DONALD J.
TRUMP, IVANKA TRUMP, DONALD
TRUMP, JR., and CUSHMAN AND
WAKEFIELD, INC.,

Respondents.

Index No.: 451685/2020

AFFIDAVIT OF RONALD P.
FISCHETTI

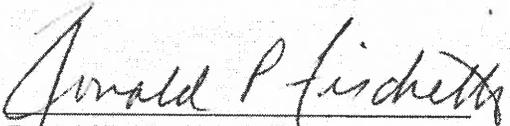
I, Ronald P. Fischetti, being duly sworn, deposes and says:

1. I am a partner at Fischetti & Malgieri LLP. I represent the respondent, Donald J. Trump (“Respondent”), in the criminal investigation being conducted by the New York County District Attorney’s Office.

2. I submit this affidavit in accordance with the Order of the Hon. Arthur Engoron, J.S.C. dated May 11, 2022.

3. The Office of the Attorney General (the “OAG”) served a subpoena dated December 1, 2021 (the “Subpoena”), demanding certain documents from Respondent. After receiving this subpoena, I had a call with Respondent who stated he did not have any documents responsive to the subpoena in his possession. I then related that fact to co-counsel who were dealing with document production in connection with the Attorney General investigation.

4. I had no other involvement in document production regarding the Subpoena. I do not have any documents in my possession that are responsive to the document demands in the Subpoena.


Ronald P. Fischetti, Esq.

STATE OF *New York*)
COUNTY OF *New York*)

On this 19th day of May in the year 2022, before me, the undersigned, a notary public in and for said state, personally appeared Ronald P. Fischetti personally known to be or proved to me on the basis of satisfactory evidence to be the individual whose name is subscribed to the within instrument and acknowledged to me that he executed the same in his capacity, and that by his signature on the instrument, the individual, or the person or entity upon behalf of which the individual acted, executed the instrument.



Notary Public

ELLEN RESNICK
Notary Public, State of New York
No. 02RE6095466
Qualified in New York County
Commission Expires on August 18, 2023

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

PEOPLE OF THE STATE OF NEW YORK, by
LETITIA JAMES, Attorney General of the State
of New York,

Petitioner,

v.

THE TRUMP ORGANIZATION, INC., DJT
HOLDINGS LLC, DJT HOLDINGS
MANAGING MEMBER LLC, SEVEN
SPRINGS LLC, ERIC TRUMP, CHARLES
MARTABANO, MORGAN, LEWIS &
BOCKIUS, LLP, SHERI DILLON, DONALD J.
TRUMP, IVANKA TRUMP, DONALD
TRUMP, JR., and CUSHMAN AND
WAKEFIELD, INC.,

Respondents.

Index No.: 451685/2020

AFFIRMATION

I, Lawrence S. Rosen, an attorney duly licensed to practice law in the State of New York,
do hereby affirm under the penalty of perjury as follows:

1. I am a member of LaRocca Hornik Rosen & Greenberg LLP, attorneys for
respondents The Trump Organization, Inc., DJT Holdings, LLC, DJT Holdings Managing Member
LLC, and Seven Springs LLC (together, "TTO").

2. I submit this affirmation in accordance with the Order of the Hon. Arthur Engoron,
dated May 11, 2022.

3. Incorporated here by reference is my Affirmation of Compliance, dated April 29,
2022, previously submitted to the OAG.

4. From December 1, 2021 until now, I have had multiple phone calls, in-person
meetings, correspondence, and conversations with Habba Madaio & Associates, including Alina

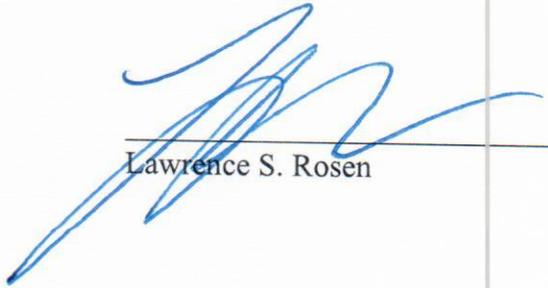
Habba and Michael T. Madaio (“Co-Counsel”), regarding TTO’s compliance with the OAG’s prior subpoenas issued to TTO (the “TTO Subpoenas”).

5. During that period, I provided to Co-Counsel: direct access to TTO’s entire document production to the OAG; all of the weekly status reports that were sent to the OAG; and work product, summaries, or other related information that Co-Counsel expressly requested of my firm.

6. Also during that period, our firm provided to Co-Counsel the following documents, which had previously been produced to the OAG by TTO: TTO_214579, TTO_214580, TTO_214581, TTO_05439138, TTO_05439139 through TTO_05439275, TTO_05439276 through TTO_05439412, TTO_05439413 through TTO_05439654, TTO_05439655, TTO_05439656 through TTO_05439675, and TTO_05439676.

Dated: New York, New York

May 20, 2022



Lawrence S. Rosen

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

PEOPLE OF THE STATE OF NEW YORK, by
LETITIA JAMES, Attorney General of the State
of New York,

Petitioner,

v.

THE TRUMP ORGANIZATION, INC., DJT
HOLDINGS LLC, DJT HOLDINGS
MANAGING MEMBER LLC, SEVEN
SPRINGS LLC, ERIC TRUMP, CHARLES
MARTABANO, MORGAN, LEWIS &
BOCKIUS, LLP, SHERI DILLON, DONALD J.
TRUMP, IVANKA TRUMP, DONALD
TRUMP, JR., and CUSHMAN AND
WAKEFIELD, INC.,

Respondents.

Index No.: 451685/2020

AFFIRMATION OF AMY D. CARLIN

I, Amy D. Carlin, an attorney duly licensed to practice law in the State of New York, do hereby affirm under penalty of perjury as follows:

1. I am a partner of LaRocca Hornik Rosen & Greenberg LLP, attorneys for respondents The Trump Organization, Inc., DJT Holdings, LLC, DJT Holdings Managing Member LLC, and Seven Springs LLC (together, "TTO").

2. I submit this affirmation in accordance with the Order of the Hon. Arthur Engoron, J.S.C. dated May 11, 2022.

3. Incorporated here by reference is the Affirmation of Compliance of Lawrence S. Rosen dated April 29, 2022, previously submitted to the OAG.

4. From December 1, 2021 until now, I have had numerous phone calls, correspondence, and conversations with Habba Madaio & Associates, including Alina Habba and

Michael T. Madaio (“Co-Counsel”), regarding TTO’s compliance with the OAG’s prior subpoenas issued to TTO.

5. During that period, I provided to Co-Counsel any work product, summaries, or other related information that Co-Counsel expressly requested of my firm.

Dated: New York, New York

May 20, 2022



Amy D. Carlin

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

PEOPLE OF THE STATE OF NEW YORK, by
LETITIA JAMES, Attorney General of the State
of New York,

Petitioner,

v.

THE TRUMP ORGANIZATION, INC., DJT
HOLDINGS LLC, DJT HOLDINGS
MANAGING MEMBER LLC, SEVEN
SPRINGS LLC, ERIC TRUMP, CHARLES
MARTABANO, MORGAN, LEWIS &
BOCKIUS, LLP, SHERI DILLON, DONALD J.
TRUMP, IVANKA TRUMP, DONALD
TRUMP, JR., and CUSHMAN AND
WAKEFIELD, INC.,

Respondents.

Index No.: 451685/2020

**AFFIDAVIT OF MICHAEL T. VAN
DER VEEN**

I, Michael T. van der Veen, being duly sworn, deposes and says:

1. I am the founding partner of van der Veen, Hartshorn, and Levin. My office represents the respondent, Donald J. Trump (“Respondent”) in a separate matter involving the New York County District Attorney’s office (the “NYDA”).

2. I submit this affidavit in accordance with the Order of the Hon. Arthur Engoron, J.S.C. dated May 11, 2022.

3. Through the fall of 2021, that is from around September 1st to December 31st of 2021, the firm worked to collect documents and produce responsive documents to various NYDA subpoenas. We searched for documents related to all golf courses, all conservation easements and 40 Wall Street. Beyond that, we also searched for all personal and business correspondence of the Respondent. To accomplish this, we spent hundreds upon hundreds of hours, collecting, searching

and collating millions upon millions of documents. We had various levels of review, starting with Haystack and with the assistance of Brooks Pierce and their use of artificial intelligence. We then hand reviewed thousands upon thousands of documents.

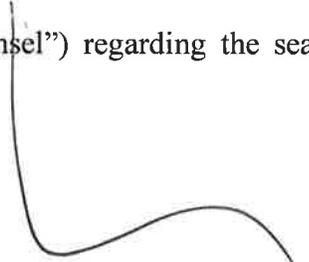
4. With respect to the correspondence of the Respondent, I physically searched by hand, the entire “chron file” kept by the Respondent, at the Respondent’s corporate offices for all business and personal (non-political) correspondence.

5. To search for other correspondence, we had his executive assistances various computer drives searched and we went through those documents with the same process that we employed with all other search topics.

6. The time period for the chron file was an eleven-year period ending when the Respondent became President of the United States. We had no ability to search Government databases for correspondence during his time as President. We also searched for any and all correspondence that were kept at Mara Lago, Bedminster or his home in Trump Tower.

7. On or about December 14, 2021, I personally interviewed Respondent and Respondent’s executive assistant Molly Michael to determine whether they possessed any documents that would be responsive to prior subpoenas issued by the NYDA.

8. I had a phone call and various other correspondence with Respondent’s other counsel, Habba Madaio & Associates (“Respondent’s Counsel”) regarding the search efforts performed by my office on behalf of Respondent.



Michael T. van der Veen, Esq.

STATE OF)

COUNTY OF)

On this 20th day of May in the year 2022, before me, the undersigned, a notary public in and for said state, personally appeared Michael T. van der Veen personally known to be or proved to me on the basis of satisfactory evidence to be the individual whose name is subscribed to the within instrument and acknowledged to me that he executed the same in his capacity, and that by his signature on the instrument, the individual, or the person or entity upon behalf of which the individual acted, executed the instrument.



Notary Public

