

DONALD J. TRUMP
NORMAN HIRSCH vs. JUPITER GOLF CLUB

April 16, 2015

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
PALM BEACH DIVISION

NORMAN HIRSCH, MATTHEW DWYER,
and RALPH WILLARD, Individually
and on behalf of all others
similarly situated,

Plaintiffs,

Civil Action
No.

-against-

JUPITER GOLF CLUB LLC, a Delaware
LLC d/b/a TRUMP NATIONAL GOLF
CLUB JUPITER and RBF, LLC d/b/a
THE RITZ -CARLTON GOLF CLUB &
SPA JUPITER,

Defendants.

VIDEOTAPED DEPOSITION OF JUPITER
GOLF CLUB LLC by DONALD J. TRUMP, a Witness
herein, taken by Plaintiffs, pursuant to
Notice, at the offices of Trump Organization,
725 Fifth Avenue, New York, New York, on
April 16, 2015, at 9:18 a.m., before DEBRA
STEVENS, a Certified Realtime and Registered
Professional Reporter and Notary Public,
within and for the State of New York.

DONALD J. TRUMP
NORMAN HIRSCH vs. JUPITER GOLF CLUB

April 16, 2015

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A P P E A R A N C E S :

FARMER, JAFFE, WEISSING, EDWARD, FISTOS &
LEHRMAN, P.L.

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BRAD EDWARDS, ESQ.

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BY: JERRY R. LINSKOTT, ESQ.

RUSSOMANNO & BORRELLO
Attorneys for Defendant Jupiter
Golf Club LLC
Museum Tower
Penthouse 2800
150 West Flagler Street
Miami, Florida 33130

BY: HERMAN J. RUSSOMANNO III

ALSO PRESENT:

Douglas A. Kelly, Sr. Counsel,
Marriott Vacations Worldwide
Julie Singer Brady (via teleconference)
Alex Quimby (via teleconference)
Gregory Holderman, Videographer

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IT IS HEREBY STIPULATED AND
AGREED that all objections, except as to the
form of the questions, shall be reserved to
the time of the trial;

IT IS FURTHER STIPULATED AND
AGREED that the within examination may be
subscribed and sworn to before any notary
public with the same force and effect as
though subscribed and sworn to before this
court.

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THE VIDEOGRAPHER: Here begins videotape number 1 in the deposition of Donald Trump in the matter of Hirsch, Norman v. Jupiter Golf Club LLC, et al.

Today's date is April 16, 2015. The time on the video monitor is 9:18 a.m. This deposition is being taken at the offices of the Trump Organization, 725 Fifth Avenue, and was made at the request of Mr. Seth M. Lehrman.

I am Gregory Holderman, videographer, and our court reporter today is Debra Stevens from Esquire Deposition Solutions, New York, New York.

Counsel, including those who are appearing via teleconference, please identify yourselves and state whom you represent for the record.

MR. LEHRMAN: Seth Lehrman along with Brad Edwards, representing Plaintiffs.

MR. RUSSOMANNO: Herman Russomanno on behalf of Defendant Jupiter Golf Club LLC.

MR. LINSOTT: Jerry Linscott with Baker Hofstetler, on behalf of RBF. From

1 D. Trump
2 time to time throughout the deposition, my
3 partner, Julie Singer-Brady and my associate
4 Alex Quimby may be attending by telephone.

5 MR. KELLY: Douglas Kelly, vice
6 president and senior counsel with Marriott
7 Vacations Worldwide.

8 MR. GARTEN: Alan Garten on behalf
9 of Defendants Jupiter Golf and Trump
10 National.

11 (Whereupon,

12 DONALD J. TRUMP,
13 having been first duly sworn/affirmed, was
14 examined and testified as follows:

15 EXAMINATION BY

16 MR. LEHRMAN:

17 Q. Mr. Trump, we know your name but
18 can you tell us your name for the record,
19 please?

20 A. Donald J. Trump.

21 Q. Thank you.

22 Mr. Trump, we had the opportunity
23 yesterday to speak with and depose your son
24 Eric as well as David Cohen. We understand
25 from speaking with them yesterday that

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D. Trump

Jupiter Golf Club and the Trump organization, after acquiring the club facilities from RBF, formerly the Ritz-Carlton Golf Club and Spa Jupiter, that you all have turned the club around and done really a very successful job at turning it around, developing it and making the members happy.

So, some of what I cover today with you as efficiently as possible is to go over and follow up on some of the information we learned yesterday and really to understand what members received for their money. All right?

A. Okay. Sure.

Q. So, to start, having a club membership at Trump National in Jupiter, that entitles members to access the club facilities there; right?

A. Yes, that's true.

Q. We understand from Eric that you -- and I mean Jupiter Golf Club LLC and the Trump organization -- made substantial improvements to many of the club facilities, including re-doing bunkers, moving tee boxes,

1 D. Trump
2 the ballroom, many things like that to make
3 the club a luxurious club. Is that true?

4 A. That's true.

5 Q. Can you describe for us what some
6 of those improvements were that were made to
7 the club?

8 A. Well, we virtually rebuilt the
9 course. We made it longer. We were able to,
10 at great length, get environmental approvals
11 that they were not able to get before and
12 make various holes wider, bigger, longer,
13 more effective.

14 We were able to get approval to do
15 a ballroom so that people can have weddings,
16 especially if they are members and if they
17 are, you know, associated with the club.
18 They can have a beautiful ballroom that is
19 almost complete.

20 We spent a tremendous amount of
21 money on the kitchen, on the dining rooms,
22 all of the public spaces, the bar areas. The
23 swimming pool, we have virtually redone the
24 swimming pool and made it beautiful. It was
25 very weak. We made it good.

1 D. Trump

2 So, I mean we have done a very,
3 very substantial upgrade. We even re-did the
4 tennis courts. They were very tired, and we
5 built new tennis courts.

6 We have done a substantial upgrade
7 to virtually all of the facility: the
8 clubhouse, the courts, the course, the public
9 areas, the dining areas. Everything. It's
10 like a brand new place.

11 Q. From speaking with your son Eric
12 yesterday it was evident that he and the
13 Trump organization take pride in the
14 improvements you made to the club facilities.

15 A. That's true.

16 Q. Is it fair to say that if a club
17 member's membership is terminated they loose
18 access to those club facilities?

19 A. If it is terminated they would,
20 generally speaking, unless there is some kind
21 of a termination caveat, which I wouldn't
22 know about -- Eric really is more familiar
23 with that. But generally speaking that would
24 be true.

25 Q. Now, club members can access the

1 D. Trump

2 club facilities. Right?

3 A. Yes.

4 Q. Other than club members, who else
5 has the right to access the club facilities
6 that you described?

7 A. I don't know what the exact
8 document says but generally speaking it would
9 be for club members.

10 Q. Now, when you, when the Ritz
11 organization -- sorry. When the Trump
12 organization, through Jupiter Golf Club LLC,
13 chose to acquire the club facilities from
14 RBF, Jupiter Golf Club agreed to assume
15 certain obligations of the former club owner.
16 Correct?

17 A. Yes, I think that's correct.

18 Q. And when I say Jupiter Golf Club
19 LLC, I understand that you are the top
20 executive of that organization. Right?

21 A. Yes.

22 Q. And you are the top executive of
23 the Trump parent organization, whatever that
24 is. Correct?

25 A. Otherwise we have a big story.

1 D. Trump

2 Front page news.

3 Q. We'll save that for another day.

4 A. The answer is yes.

5 Q. So, I understand that although this
6 was Jupiter Golf Club LLC, since you are the
7 head of Jupiter Golf Club LLC and you're the
8 head of the Trump parent organization, this
9 is you at the helm of this?

10 A. Yes.

11 Q. From Eric's testimony we understood
12 that maybe your primary motivation to acquire
13 this golf club was that it was not
14 successful --

15 A. That's true.

16 Q. -- when it was being operated by
17 its prior owner and that your organization
18 saw an opportunity, because you are in this
19 business of successfully operating golf club
20 properties, that you saw an opportunity to
21 make the substantial improvements that you
22 described and to turn this club into an
23 ultra-luxurious and successful golf club.
24 Right?

25 A. Well, successful. It was supposed

1 D. Trump

2 to be luxurious before. You know, you could
3 have debates either way, but I can say the
4 members now are very happy.

5 Q. You made the members happy and you
6 made the club successful. Correct?

7 A. That's true.

8 Q. I understand that you personally
9 attended a meeting with the club membership
10 at Trump International shortly after you
11 acquired the club. Right?

12 A. Right. The ballroom.

13 Q. The ballroom meeting.

14 Can you explain to us what you told
15 members at that meeting?

16 A. Well, basically we had a meeting to
17 let members know that they had an opportunity
18 to have access to other of my clubs,
19 including Mar-a-Lago, including Trump
20 International, which is by some accounts the
21 number one course in the state of Florida;
22 including other places. Scotland -- lots of
23 other places. That they'd have access to
24 some of these other great clubs but we wanted
25 to redo their documents and change certain

1 D. Trump

2 aspects of their documents.

3 And I will say before I get too
4 much into it, Eric Trump really led this
5 charge much more so than I. He is much more
6 familiar with it than I am.

7 But we had a meeting to really
8 explain the whole Trump club system and that
9 if they wanted to change their document, they
10 would be invited -- and by the way -- that is
11 why I am even surprised by this. I didn't
12 even know this was going on. Most people
13 agreed to that and waived their liability or
14 whatever you want to call it. Most people,
15 somebody said 95 percent of the people,
16 approximately 95 percent of the people or
17 thereabouts have already settled.

18 But that was basically a meeting
19 to -- to explain about other clubs and the
20 access that you'd be given, et cetera, et
21 cetera, et cetera. And most people loved
22 that. And most people -- many people right
23 from the beginning just jumped right on it
24 and signed.

25 Q. So these options that you presented

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D. Trump

to members at that meeting, these were things that you had discussed with Eric and others before that meeting. Correct?

A. Yes. Sure.

Q. And so the idea or the plan to make this presentation to them was not something you came up with on the spot?

A. No. It was a concept -- I don't think it's unique to us but it's a concept -- because otherwise, with the liability of the club, the club would never have sold. It would have been -- I think it would have been -- I don't know. Maybe closed. Maybe closed. And then people would have been totally wiped out of their money entirely.

Q. Just to be clear, when you refer to that liability, you are referring to the approximately \$41 million net deposit refund obligation. Correct?

A. I don't know what the actual number is, but I will say a lot of it wasn't due for many, many years. So it might have been 41, but some of it wasn't due for 20 years and some of it wasn't due for 15 years.

1 D. Trump

2 Some of it was 5 to 1, meaning, you
3 know, it's like -- it takes a long time to
4 get it back. Many of the members wouldn't
5 have gotten their money back for many, many
6 years anyway.

7 But it could have been that the
8 club would have closed and gone into a
9 bankruptcy. I don't know. You can speak to
10 the Ritz-Carlton people or the Marriott
11 people. It could have been that the club --
12 I think that's one of the reasons they wanted
13 to sell it to us, because it could have been
14 that the club would have closed and gone into
15 bankruptcy and everybody would have been
16 wiped out of their money.

17 Q. Did --

18 A. I don't think -- in all fairness to
19 Marriott, I don't think they wanted to see
20 that happen. I think they had the best
21 interests of the people at heart. But that's
22 something that, frankly, was an alternative
23 they could have done.

24 Q. Just to be clear, the liability,
25 irrespective of the amount of it, the

1 D. Trump

2 liability you are referring to is the
3 assumption of the refund?

4 A. That is correct. That's the
5 liability.

6 Q. And --

7 A. Which would have been wiped out if
8 somebody wanted to use the "B" word.

9 Q. Following the meeting that you had
10 with the club members at Trump International,
11 there was a letter that you sent outlining
12 the plan that you had presented at that
13 meeting. Right?

14 A. That's correct.

15 Q. And the letter was signed by you on
16 behalf of Trump National Golf Club. Right?

17 A. Right.

18 Q. And it was addressed to all club
19 members. Correct?

20 A. Correct.

21 Q. So I am going to hand you, through
22 your counsel, this is the last two pages of
23 Exhibit 32.

24 A. Okay.

25 Q. We understand this is a true and

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D. Trump

correct copy of the December 17, 2012, letter that you sent to club members.

A. Okay.

Q. Is that right?

A. Yes.

Q. This is a letter that you prepared. Right?

A. Well, actually, my son is much more familiar with the letter. I signed it because I am the owner, but my son Eric, who you have already taken his deposition, he is much more familiar with the letter than I am.

Q. I want to take a look at this letter. And consistent with my understanding of what happened at the meeting, in this letter you present to the members that there were three options available to them. Isn't that right?

A. I don't know. I really don't know. Eric is much more familiar with this than I am.

Q. Let's walk through this letter. If you go down to the third paragraph, the sentence that says "therefore," it says,

1 D. Trump

2 "Therefore, as we discussed there are three
3 directions in which we can go but in our
4 opinion only one if we want to bring the club
5 to the next level of luxury."

6 A. Okay.

7 Q. Then there are two paragraphs below
8 that. One presents an opt-in option and one
9 presents an opt-out option. Right?

10 A. Okay. Yeah. Sure.

11 Q. The opt-in option, essentially you
12 presented to club members that the opt-in
13 option would be them agreeing to convert
14 their refundable deposit into a
15 non-refundable deposit. Isn't that right?

16 A. Yes, and they get a reduced -- a
17 reduced dues period.

18 Q. So in return for agreeing to
19 convert their refundable deposit into a
20 non-refundable deposit, they would receive a
21 10-percent reduction in dues for three years.
22 Correct?

23 A. Right.

24 Q. And they would have the right to
25 play at three other Trump properties,

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D. Trump

Mar-a-Lago, Trump International Golf Course
Palm Beach and Trump National Doral?

A. Correct.

Q. As we understand it from this
letter, the next option, the opt-out option,
means that members do not agree to convert
the refundable deposit to non-refundable;
right?

A. Right.

Q. And they, as a consequence, they
agree that their dues are going to increase
by 20 percent. Correct?

A. I think that's correct.

Q. And they agree that there is no
dues cap. Right?

A. No dues cap. That's correct. We
were giving them, if they opted in, we were
giving them a dues -- a period of time or
something that they -- as they worked out.
And this one, there would be no dues cap.
That's right.

Q. And they also would not have the
right to have reciprocity or playing
privileges at the other three Trump clubs.

1 D. Trump

2 Right?

3 A. That's correct, yes.

4 Q. So, through this letter you
5 intended to communicate these options to club
6 members. Isn't that right?

7 A. True.

8 Q. And you expected that club members
9 would make a decision based on this letter.

10 Right?

11 A. And most of them did.

12 Q. Right.

13 A. Most of them opted in.

14 Q. Most of them opted in; and you had
15 asked toward the bottom of the letter, the
16 second to last paragraph of the letter above
17 your signature, you had asked that members
18 respond before Monday, December 31st. Right?

19 A. Yes, that's what this says. Yes.

20 Q. And so you expected people to make
21 a choice and to make a choice in the time
22 that you allowed. Right?

23 A. Correct.

24 Q. We understand from the letter and
25 we understand from what we have heard about

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D. Trump

the meeting that one of the significant, maybe the most significant problem that you saw, the Trump organization saw with this club was the members on the resignation list. Is that right?

A. I wouldn't say it was most significant. The significant problem was maybe the place was not in great shape. That was a significant problem. That's why we spent a lot of money to make it beautiful.

And we had some people on the resignation list that after they saw the incredible job we did, they went back in. They actually came back in and opted in. We have them also.

Q. Well, your letter addresses the issue or challenge that you all saw with so many members being on the resignation list.

A. Correct.

Q. I will point you to the top of the second page, and we are going to break down this paragraph one sentence at a time.

A. Top paragraph?

Q. Top paragraph.

1 D. Trump

2 A. Okay.

3 Q. "Additionally it became clear based
4 on the overwhelming applause at Trump
5 International that if a person is on the
6 resignation list the membership does not want
7 them to be an active member of the club.

8 Likewise, as the owner of the club, I do not
9 want them to utilize the club, nor do I want
10 their dues."

11 Do you see that sentence?

12 A. Yes.

13 Q. Again, this was a communication by
14 you to the members on the resignation list.
15 Right?

16 A. Yes.

17 Q. Wouldn't you agree that you
18 expected that members of the club, when they
19 read that sentence, that they would
20 understand that if they stayed on the
21 resignation list, then you don't want their
22 dues?

23 A. I don't really know exactly what it
24 means. You'd have to ask Eric. I believe we
25 allowed people to stay and pay dues. So I

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D. Trump

know this might say that; it might not. I really don't know because Eric is much more familiar with this club. He runs it.

But I believe we have numerous people that were on the list, paid their dues, and were able to stay.

Q. You would expect --

A. Because we made different deals with different people.

Q. Mr. Trump, by the way, I apologize. I don't mean to interrupt you.

A. That's okay.

Q. As I mentioned to counsel yesterday, I am used to, at home, being interrupted constantly so I sometimes bring that into these deposition. By all means, if I prevent you from giving a full --

A. That's okay. Don't worry about it.

Q. Thank you.

By the same token, that sentence, didn't you expect that people, club members who were on the resignation list who read the sentence, didn't you expect them to understand that that meant that if they

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D. Trump

stayed on the resignation they would not have access to the club facilities?

Regardless of what the club actually did, didn't you expect club members to understand the sentence that way?

MR. RUSSOMANNO: Object to the form.

A. I think when you have a club -- and I can't carve this in stone because you really have to ask Eric; he's the guiding light on this job.

When you have a club, you have a group of people that you want to have happy. And we have a very group of happy members. I think when a person is on a resignation list, that sends a bad signal to a lot people. It means you want to get out of the club. You're probably not going to be a very good club member, you're not going to be so happy. And perhaps that's what Eric meant by this clause.

People in the club, in other words, they don't want to see people that want to leave, that want to get out, that are on a

1 D. Trump
2 resignation list. For the sake of the
3 happiness of the people there, I could see a
4 clause like this being fairly important.

5 Q. I appreciate your explanation of
6 the context and I understand that Eric
7 prepared this document. But you have
8 acknowledged that you have signed it and by
9 signing it --

10 A. That's okay. Sure.

11 Q. -- I assume you acknowledge these
12 are your words effectively; right?

13 A. Well, yeah. I signed it as the
14 owner.

15 Q. Going to the next -- going on to
16 the next sentence, "On the other hand --"
17 actually I skipped a sentence.

18 "In other words, we are committed
19 to seeing Trump National Golf Club-Jupiter,
20 on the list of the best clubs in the world
21 and if you choose to remain on the
22 resignation list, you're out."

23 You see that sentence?

24 A. Yes, I do.

25 Q. In fact, the substantial

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D. Trump

improvements to the club facilities that you described, that was part of the commitment you made to improving the club and making it amongst the best clubs?

A. Correct.

Q. So, in that respect you did exactly what you said you were going to do. Right?

A. That's true. And more.

Q. Through that sentence, "If you choose to remain on the resignation list, you're out," you are conveying to club members that they would be out of the club. Right?

A. Yes. And they wouldn't be paying dues by the way.

Q. And they wouldn't be paying dues --

A. So they're not paying dues. We're not saying, "Pay your dues and, by the way, you're out."

We are saying if you are on the resignation list, that means you don't want to be a member of the club. That means you might have some angry people from Ritz-Carlton that are on the resignation

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D. Trump

list, and we don't want them at the club.

They want out of the club so we don't want them in the club.

Q. And you don't want them to pay dues from that point?

A. Well, they're not paying dues.

Q. And you are not going to seek to collect --

A. Many of these people were not paying dues. I think for the most part they weren't paying dues when they are on the resignation list. Many of these people were not paying dues.

Q. And from your letter, you are communicating to the members that if they stayed on the resignation list Trump National would not collect ongoing dues from them. Correct?

A. I think that's what the letter says. I don't know what they did because, you know, there were lots of different negotiations on this club because it's very complex. But you'd have to ask Eric that question.

1 D. Trump

2 Q. But we can agree that's what the
3 letter said. Correct?

4 A. The letter says that, yes, but we
5 also negotiated with people.

6 Q. And we can also agree that the
7 letter that says if a person remains on the
8 resignation list they won't have access to
9 the club facilities. Right?

10 A. Well, they are not going to be
11 paying dues, they're on the resignation list,
12 and unless they make a special deal, which is
13 possible certainly, they wouldn't have
14 access; yes.

15 And again, most of these people
16 have settled. I didn't even know we had any
17 left, if you want to know the truth, until I
18 found out about a deposition today. I
19 thought it was all settled.

20 Q. And it's funny. We thought there
21 were a lot more people on the list. So,
22 there you go.

23 A. You probably -- most of the people
24 have settled and they are very happy.

25 Q. And we heard that in substantial

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D. Trump

part from Eric and from David Cohen
yesterday.

A. Yes. Pretty much all of them.

Q. So --

A. You didn't know that? This is off
the record, but you didn't know that?

Q. We are actually on the record. I
am happy to discuss things off the record
with you --

A. Okay. You can say. You didn't
know that so many people had settled?

Q. It's no secret. So through
discovery we had obtained a list back in
November of 150 people that we understood
were --

A. Most of them had settled.

Q. And we learned that yesterday. You
know, that's what happens.

MR. EDWARDS: So we're all here.

Q. I appreciate you taking your time
to walk us through the letter --

A. That's okay.

Q. -- and confirm certain things.

Would you agree that to a club

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D. Trump

member the most important right that they have when they're a member of a club is their right to have access to club facilities?

A. Not if they are on a resignation list. If they're on a resignation list, they don't want to be there.

Q. I am not referring to the resignation list. Just saying if someone is a member of a club, would you agree if they are a club member that the most important benefit or right they have is access to club facilities?

A. Yes, I would say that's true if they are not on a resignation list.

Q. After -- you know, you indicated that we should speak to Eric about certain things as far as what the club actually did from an operational standpoint.

A. Okay.

Q. Right? That's true?

A. Sure.

Q. And I think you indicated there might be -- because your letter says something, it might be that the club actually

1 D. Trump

2 acted in a different way?

3 A. Sure. It's called negotiation.

4 Q. To sort out that negotiation and
5 what the differences between what the letter
6 says and what the club actually did, you
7 indicated we should speak to Eric, which I
8 appreciate.

9 After your December 17th letter
10 that we are reviewing now, was there another
11 letter, a subsequent letter or communication
12 that you sent or that the club sent to club
13 members to clarify to them some difference
14 between what the letter said and what the
15 club was actually doing?

16 A. I don't know. That, I don't know.

17 Q. Now, if the club was actually
18 allowing members on the resignation list to
19 have access to the club facilities -- you
20 have already told us that you acknowledge the
21 letter says that members on the resignation
22 list would not have access to club
23 facilities.

24 A. And wouldn't pay their dues.

25 Q. And would not pay their dues.

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D. Trump

Thank you.

I just want to clarify, if the club's actual practice following transmission of this letter was to allow members on the resignation list to use the club facilities, how would you expect that club members would understand that, having received this letter?

A. I would say the club members would call the director of admissions or Tony Servideo, who is the club manager, and say, "Hey, listen, you know, we want to stay for another year. We want to be on the list but we want to pay our dues."

I would say that it's possible that those people would be allowed to stay. But I would imagine we have had cases like that. But they would call up based on this letter and say, "You know, I am moving, I am only going to be here for a year but we'd like to stay and we'd like to pay dues for a year or two years," however long they are going to be.

And things like that, I believe, happened. That's what happens with clubs.

1 D. Trump

2 Q. Were club members denied access to
3 the club facilities because they stayed on
4 the resignation list?

5 A. That I don't know. I don't know.

6 Q. Do you believe -- do you have --

7 A. There weren't too many of them
8 honestly because most of the people opted in.
9 The vast majority of people have opted in so
10 there weren't that many of them. I would say
11 Eric Trump would answer that question much
12 better than me, or Tony Servideo maybe. But
13 there were really very few people in that
14 category.

15 Q. We understand -- I have not been to
16 the club but I understand from speaking with
17 club members that when you enter the club
18 there is a driveway and there is a gate and
19 there is two lanes?

20 A. Right.

21 Q. One is manned by a security person
22 and one is a gate where if you are a member
23 you have a transponder in your car and the
24 gate opens.

25 A. Okay.

1 D. Trump

2 Q. We have received reports from club
3 members who remained on the resignation list
4 that their transponders were deactivated,
5 that they arrive at the club and the gate
6 would not open and that they would told by
7 the security guard that this is what
8 happened, the transponder was turned off and
9 that is why the gate would not open and that
10 the security guard would not therefore allow
11 them access to the club.

12 Do you have any idea why these club
13 members believe their transponders were
14 turned off?

15 A. I don't know. I am not aware of
16 it, but I don't know.

17 Q. The meeting that you held at your
18 Trump International Club, who actually gave
19 that presentation?

20 A. Eric Trump, and I did to a lesser
21 extent.

22 Q. At the -- when you give a
23 presentation like that, just generally when
24 you give presentations or you send a letter
25 to someone, I would guess, based on your

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D. Trump

reputation and what we have read about you, that you are someone that when you speak, that you expect people to listen to you. Is that fair to say?

A. I think so. It was very well received I can tell you. People were very happy that we were buying it, taking it over, and they were very happy to opt in.

Q. Likewise, in the specific instance of the meeting, like you are indicating, you felt that people heard you. Correct?

A. I think so, yes.

Q. People supported the message you delivered. Is that right?

A. Yes.

Q. And likewise, when you sent this letter to people, you expected people to read it; right?

A. Yes.

Q. You expected they'd understand it; right?

A. I think so.

Q. And you expected they would rely upon what you said in the letter; right?

1 D. Trump

2 A. No. I think they have their own
3 minds. I mean, they are -- it's an option.
4 They don't have to opt in. They can do
5 whatever they wanted to do. In some cases
6 they'd just call and make their own deal.

7 Q. But to the extent that you said,
8 "Here are your options," you expected they
9 would believe those were in fact their
10 options?

11 A. Well, they'd look at it. But a lot
12 of people called and negotiated from that
13 point.

14 Q. You expected that to the extent you
15 said people would not have access to club
16 facilities, that they would believe that;
17 correct?

18 A. I can imagine. I would think so.

19 MR. LEHRMAN: One minute, please.

20 (Pause.)

21 Thank you.

22 THE WITNESS: Thank you very much.
23 Appreciate it. So fast.

24 MR. LEHRMAN: I don't know if other
25 folks have --

DONALD J. TRUMP
NORMAN HIRSCH vs. JUPITER GOLF CLUB

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D. Trump

MR. LINSOTT: Nothing.

MR. RUSSOMANNO: Nothing further.

And we'll read.

THE VIDEOGRAPHER: We are now off
the record. The time on the video monitor is
9:47 a.m.

(Time noted: 9:47 a.m.)

Subscribed and sworn to
before me this day
of , 2015.

Notary Public

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

I, DEBRA STEVENS, a Registered Professional Shorthand Reporter and notary public, within and for the State of New York, do hereby certify:

That DONALD J. TRUMP, the witness whose examination is hereinbefore set forth, was first duly sworn by me, and that transcript of said testimony is a true record of the testimony given by said witness.

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

IN WITNESS WHEREOF, I have hereunto set my hand this day of , 2015.



DEBRA STEVENS, RPR-CRR

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DEPOSITION ERRATA SHEET

Our Assignment No.: 292282

Case Caption: Hirsch v. Jupiter Golf

DECLARATION UNDER PENALTY OF PERJURY

I declare under penalty of perjury that I have read the entire transcript of my Deposition taken in the captioned matter or the same has been read to me, and the same is true and accurate, save and except for changes and/or corrections, if any, as indicated by me on the DEPOSITION ERRATA SHEET hereof, with the understanding that I offer these changes as if still under oath.

DONALD J. TRUMP

Subscribed and sworn to on the ____ day of _____, 20 ____ before me.

Notary Public,
in and for the State of

_____.

DONALD J. TRUMP
NORMAN HIRSCH vs. JUPITER GOLF CLUB

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DONALD J. TRUMP



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DONALD J. TRUMP

