

# **EXHIBIT 6**

1  
2 UNITED STATES DISTRICT COURT  
3 FOR THE SOUTHERN DISTRICT OF NEW YORK

4 CASE No. 20 CIV. 7311 (LAK) (JLC)

5 E. JEAN CARROLL,

6 Plaintiff,

7 -vs-

8 DONALD J. TRUMP,  
9 in his personal capacity,

10 Defendant.  
\_\_\_\_\_ /

11  
12  
13 = = =

14 CONFIDENTIAL

15 = = =  
16

17 VIDEOTAPED DEPOSITION OF DONALD J. TRUMP

18 Wednesday, October 19, 2022  
19 10:22 a.m. - 3:50 p.m.

20 The Mar-a-Lago Club  
21 1100 South Ocean Boulevard  
22 Palm Beach, Florida, Florida

23 Stenographically Reported By  
24 Pamela J. Pelino, RPR, FPR, CLR  
25 Notary Public, State of Florida  
TSG REPORTING  
JOB NO. 218342

- - -

1 D. J. TRUMP

2 (DJT Exhibit 2 was marked for  
3 identification.)

4 BY MS. KAPLAN:

5 Q. I'm handing you a document that's printed  
6 off the Internet, and it has an Internet address at  
7 the bottom. I'm not even going to try to read that.  
8 but it's entitled the April 1987 Penn dinner, and  
9 it's several pages with several photographs. And  
10 the top page -- well, let me read into the document.  
11 It says 24 years ago -- withdrawn.

12 The article is dated April 5, 2011, and  
13 it begins by saying: "24 years ago this month at  
14 the Metropolitan Club, there was a Penn dinner to  
15 beat all previous Penn dinners. It was chaired by  
16 Gayfryd Steinberg, who was then one of the reigning  
17 queens of New York society." Do you see that?

18 A. Yes.

19 Q. And there are various photos throughout  
20 this document. The first photo on the first page is  
21 you and your wife?

22 A. Yes.

23 Q. With Ms. Steinberg?

24 A. Yes.

25 Q. And then if you turn to page 7 of 26.

1 D. J. TRUMP

2 A. (Witness complied.)

3 Q. On the bottom, do you see that picture of  
4 you?

5 A. Yes.

6 Q. Do you recognize who you're with there?

7 A. It's Elaine.

8 Q. And from the restaurant Elaine's?

9 A. Right.

10 Q. Okay. Sitting here today, sir, I take it  
11 you don't recall being at this Penn dinner in 1987?

12 A. No, not much.

13 Q. But you have no reason to believe that  
14 you weren't there as reported in this article?

15 A. No.

16 Q. Now, there's a report from the New York  
17 Times -- let me back up.

18 How often would you go to Elaine's to  
19 your recollection?

20 A. Not very much. I would say maybe a few  
21 times a year.

22 Q. And there's a report in the New York  
23 Times -- I don't have to mark this. You'll see if  
24 you remember. I'm reading from an article from the  
25 New York Times dated October 16 -- excuse me --

1 D. J. TRUMP

2 2022, that -- the title of which is "Nikki Haskell  
3 Learns the Social Costs of Supporting Donald Trump,"  
4 and it's an interview with a woman by the name of  
5 Nikki Haskell. And she says in this article that  
6 "the first night he" -- being you -- "took a Czech  
7 fashion model named Ivana Zelnícková" -- I hope I  
8 got that right -- out on the town, Ms. Haskell,  
9 along with her date. Met up with them at Elaine's."

10 Do you recall very early in your  
11 relationship with your first wife taking her out to  
12 Elaine's?

13 A. No.

14 Q. Sitting here today, do you know if you  
15 ever ate at Elaine's with Ivana Trump?

16 A. Yes, I think.

17 Q. And there's an article -- it's true, sir,  
18 that your first wife in particular liked going to  
19 Elaine's? I have numerous articles talking of her  
20 going there.

21 A. She liked different places. She liked  
22 Elaine's.

23 Q. Okay. Now, are you familiar, sitting  
24 here today, with something known as "the writers  
25 table" at Elaine's?

1 D. J. TRUMP

2 A. A little bit. Not much.

3 Q. What do you mean, "a little bit"?

4 A. Certain celebrity writers would go to  
5 Elaine's. It was known for that. She liked  
6 writers. She liked people that were intelligent,  
7 and they would -- there was a table designated where  
8 she would have dinner with certain -- usually  
9 celebrity writers.

10 Q. Do you recall ever sitting at the  
11 writers' table at Elaine's?

12 A. I might have.

13 Q. I'm going to go through just a few events  
14 that we have records of that you attended during the  
15 period late 1995 to early 1996. It shouldn't take  
16 very long, but I just want to establish this for the  
17 record.

18 MS. KAPLAN: And the first I'm going to  
19 mark is, I guess, DJT 2.

20 (DJT Exhibit 3 was marked for  
21 identification.)

22 BY MS. KAPLAN:

23 Q. So in front of you, you have a document  
24 we've marked as DJT 3. It's a reprint of something  
25 on the Internet from Getty Images, and am I right

1 D. J. TRUMP

2 that this article and this photo indicates that you  
3 attended a roast of the actor Steven Seagal at the  
4 Friars Club in New York on October 6, 1995?

5 A. Well, I have a different article.

6 MS. HABBA: We have the Mark Jacobs  
7 fashion show one.

8 MS. KAPLAN: I'm sorry.

9 (Discussion held off the record.)

10 MS. KAPLAN: I'm remarking as DJT 3 an  
11 article -- a reprint from Getty's Images.

12 (Discussion held off the record.)

13 BY MS. KAPLAN:

14 Q. Let me just scroll back for a second.

15 So in the period in the '80s and '90s,  
16 we've already discussed you would go to benefits and  
17 parties. And is it fair to say that at a lot of  
18 those parties, there would be a -- or benefits there  
19 would be kind of a photography line either at the  
20 beginning or throughout the event?

21 A. Yes.

22 Q. And that people would take photographs  
23 like Getty Images and then put them out?

24 A. Right.

25 Q. So if you look at DJT 3, is it fair to

1 D. J. TRUMP

2 say that this indicates that you were at a roast of  
3 Steven Seagal at the Friars Club in New York City on  
4 October 6, 1995?

5 A. Yes.

6 Q. All right.

7 MS. KAPLAN: Similarly, we're going to  
8 mark as -- DJT 4.

9 (DJT Exhibit 4 was marked for  
10 identification.)

11 BY MS. KAPLAN:

12 Q. And is it fair to say that this shows  
13 that you attended a fashion show with your daughter  
14 and Marla Maples on October 2, 1995, in Bryant Park?

15 A. Yes.

16 (DJT Exhibit 5 was marked for  
17 identification.)

18 BY MS. KAPLAN:

19 Q. You have DJT 5 in front of you, sir?

20 A. Yes.

21 Q. And this is another Getty Images  
22 printout, and is it fair to say that this document  
23 indicates that you were the grand marshal of the New  
24 York City Veterans Day Parade on November 10, 1995,  
25 in New York City?



1 D. J. TRUMP

2 A. Yes.

3 Q. Getty Images would be very proud of  
4 itself.

5 MS. KAPLAN: Another document we'll mark  
6 as DJT 6.

7 (DJT Exhibit 6 was marked for  
8 identification.)

9 BY MS. KAPLAN:

10 Q. DJT 6. Is it fair to say that you and  
11 your then wife, Marla Maples, were sighted at the  
12 Coco Pazzo restaurant in New York City on December  
13 4, 1995?

14 A. Yes. Looks like it.

15 (DJT Exhibit 7 was marked for  
16 identification.)

17 BY MS. KAPLAN:

18 Q. And DJT 7 indicates that you attended a  
19 fashion benefit for the design industry's foundation  
20 Fighting AIDS on April 24, 1996; correct?

21 A. Yes.

22 (DJT Exhibit 8 was marked for  
23 identification.)

24 BY MS. KAPLAN:

25 Q. And, finally, DJT 8, which you should

1 D. J. TRUMP  
2 have in front of you, sir, has a photograph, and the  
3 caption reads "New York Real Estate Giant  
4 Donald Trump Poses in His Trump Tower Office on a  
5 Giant Letter T on May 8, 1996."

6 Do you have that in front of you?

7 A. Yes.

8 Q. And you have no reason to believe that  
9 this photo wasn't taken on May 8, 1996?

10 A. It's fine.

11 Q. When you say this is fine, you mean you  
12 agree that this photo was taken of you on May 8,  
13 1996?

14 A. Yes.

15 Q. Okay. Now, during this period, which  
16 would be late 1995, early 1996, who kept your  
17 calendar?

18 A. Kept my what?

19 Q. Calendar.

20 A. Norma Foerderer.

21 Q. Norma Foerderer. She was your executive  
22 assistant?

23 A. Yes.

24 Q. And sitting here today, do you know -- I  
25 take it was kept like an old-fashioned calendar on

1 D. J. TRUMP

2 (Video played.)

3 BY MS. KAPLAN:

4 Q. We didn't show very much of it, sir.  
5 We're trying not to waste time, but I will represent  
6 to you that that was the beginning of a Charlie Rose  
7 episode from November 5, 1992. And in that episode,  
8 you talked about rumors that you might run for  
9 president.

10 Does that sound right to you?

11 A. Yeah.

12 Q. Your appearance on Charlie Rose was well  
13 received as you recall?

14 A. I think so.

15 Q. You also appeared on Saturday Night Live;  
16 correct?

17 A. Yes.

18 Q. And the first time you appeared on  
19 Saturday Night Live, as far as we can tell, was  
20 September 24, 1989, when Chevy Chase poured popcorn  
21 on your head. Do you recall that?

22 A. Could be, yeah.

23 Q. Okay. Let's go to the video, and I'm  
24 going to do the same thing.

25 MS. KAPLAN: We're going to mark this

1 D. J. TRUMP

2 video clip as DJT 11. And I'll try not to  
3 break any furniture.

4 (DJT Exhibit 11 was marked for  
5 identification.)

6 (Video played.)

7 BY MS. KAPLAN:

8 Q. Now, he's wearing a football helmet, but  
9 do you recall that taping when Chevy Chase was  
10 walking through the audience at Saturday Night Live  
11 and obviously intentionally as a joke dropped  
12 popcorn on your head?

13 A. Yes.

14 Q. And I take it you knew Lorne Michaels,  
15 the producer of Saturday Night Live?

16 A. I did.

17 Q. Were you friends with him?

18 A. He was fine. He'd always want me to be  
19 on the show. They asked me a lot. I'd do it  
20 sometimes. I hosted it. But, you know, I wouldn't  
21 say friends, but we got along.

22 Q. Did you see him from time to time maybe  
23 at social events? Charity events?

24 A. A little bit, yep.

25 Q. Okay. Now, you also -- I'm just kind of

1 D. J. TRUMP

2 going through the shows you appeared on.

3 Another show you appeared on during this  
4 period was Good Morning America?

5 A. Yeah.

6 Q. And based on our research -- and we're  
7 going to mark this as DJT -- well, let me just -- I  
8 don't think I need to mark it.

9 Based on our research -- and we're taking  
10 this from IMDB -- your first appearance on Good  
11 Morning America was April 2, 1990. Does that sound  
12 about right?

13 A. Could be.

14 Q. Okay. We'll show you the document.

15 MS. KAPLAN: Let's mark it as 12.

16 MS. HABBA: I'm just going to object on  
17 the record. I don't know what IMDB's --

18 MS. KAPLAN: Okay.

19 MS. HABBA: -- process is for figuring  
20 out that information.

21 (DJT Exhibit 12 was marked for  
22 identification.)

23 BY MS. KAPLAN:

24 Q. So your counsel just made an objection  
25 saying that she doesn't know what IMDB's process is

1 D. J. TRUMP

2 is it your understanding that it happened before the  
3 excerpt from Ms. Carroll's book was published in  
4 New York Magazine?

5 A. I don't know.

6 (DJT Exhibit 18 was marked for  
7 identification.)

8 BY MS. KAPLAN:

9 Q. I'm handing you a document that's been  
10 marked as DJT 18. It bears the Bates range Carroll  
11 24378 through 24385. Do you have that in front of  
12 you?

13 A. Yeah.

14 Q. Sitting here today, do you recognize this  
15 document?

16 A. No.

17 Q. I will represent to you that this is the  
18 excerpt from Ms. Carroll's book that was published  
19 in New York Magazine online -- originally online on  
20 June 21, 2019.

21 A. Okay.

22 Q. At any point in time, did you read this  
23 article?

24 A. Excuse me?

25 Q. Did you ever read this article? This

1 D. J. TRUMP

2 document in front of --

3 A. No, I don't believe I did.

4 (DJT Exhibit 19 was marked for  
5 identification.)

6 BY MS. KAPLAN:

7 Q. I've handed you a book marked as DJT 19,  
8 a book by E. Jean Carroll. It says What Do We Need  
9 Men For, and if you look at the publication date, it  
10 says first edition July 2019. Do you have that?

11 A. Yes.

12 Q. Do you have that book in front of you?

13 A. Yeah.

14 Q. Sitting here today, sir, have you ever  
15 read this book either in its entirety or any portion  
16 of this book?

17 A. No, never have. I've never seen the book  
18 actually.

19 Q. Okay. Now, the allegations that first  
20 appeared in DJT 18, which is the article -- it was  
21 big news that Ms. Carroll had made this allegation  
22 against you; correct?

23 A. I'd say it was, yeah. Because that's  
24 what she wanted, to sell a book.

25 Q. And it was covered widely in the press;

1 D. J. TRUMP

2 A. Perhaps, yes.

3 Q. Sitting here today, do you stand by this  
4 statement?

5 A. Yes.

6 Q. Sitting here today, are there any  
7 inaccuracies in this statement that you now know of?

8 A. Not that I can see, no. The only thing  
9 that I would say is -- and I've just heard this --  
10 that she has no idea when this event took place, and  
11 somehow 23 years is mentioned, 23 years ago. It's a  
12 long time. But she has no idea supposedly when this  
13 took place, what season, what year, what month, what  
14 day. She knows nothing. And for some reason, it's  
15 put down here 23 years ago. So, you know, at one  
16 point I was told 23 years. But I've heard since she  
17 really has no clue when this took place supposedly,  
18 which -- it didn't take place.

19 Q. So is it your testimony that when  
20 Ms. Carroll made her allegations, she had -- putting  
21 aside what day it happened that she had no idea  
22 whatsoever of what year it took place?

23 A. My lawyers told me that.

24 Q. Okay. I don't want to know what your  
25 lawyers told you.



1 D. J. TRUMP

2 this.

3 BY MS. KAPLAN:

4 Q. And I take it -- is it fair to say that  
5 when you made comments while you were president on  
6 your way to somewhere, on your way to an event, on  
7 your way to boarding Air Force One or Marine One  
8 that a transcript would be created like this and  
9 released by your press office?

10 A. Oftentimes, yeah.

11 Q. Are you better able -- this is a long  
12 one. Let's try to do this, sir. Are you better  
13 able to read the writing in this document than the  
14 previous document?

15 A. I can. You could read it. But why don't  
16 you read it?

17 Q. You want me to read it?

18 A. Yeah.

19 Q. When my son was little, I couldn't stand  
20 reading books to him because you had to read it so  
21 slow, and it would drive me nuts. But I'm going to  
22 try to read it slow.

23 At the bottom of page 1800, it says "The  
24 President," colon, and then it says as follows:

25 "I have no idea who this woman is. This

1 D. J. TRUMP

2 is a woman who has also accused other men of things  
3 as you know. It is a totally false accusation. I  
4 think she was married, as I read. I have no idea  
5 who she is, but she was married to an actually nice  
6 guy, Johnson, a newscaster.

7 "Question: You were in a photograph with  
8 her?

9 "The President: Standing with coat on in  
10 a line -- give me a break -- with my back to the  
11 camera. I have no idea who she is. What she did  
12 is -- it's terrible, what's going on. So it's a  
13 total false accusation, and I don't know anything  
14 about her, and she's made this charge against  
15 others. And, you know, people have to be careful  
16 because they're playing with very, very dangerous  
17 territory."

18 Am I going slow enough?

19 A. Yeah, you're going fine.

20 Q. "And when they do that -- and it's  
21 happening more and more. And when you look at what  
22 happened to Justice Kavanaugh and when you look at  
23 what's happening to others, you can't do that for  
24 the sake of publicity. New York Magazine is a  
25 failing magazine. It's ready to go out of business

1 D. J. TRUMP

2 from what I hear. They'll do anything they can, but  
3 this was about many men. And I was one of the many  
4 men that she wrote about. It's a totally false  
5 accusation. I have absolutely no idea who she is.  
6 There's some picture where we're shaking hands. It  
7 looks like it's some kind of event. I have my coat  
8 on. I have my wife standing next to me. And I  
9 didn't know her husband, but he was a newscaster.  
10 But I have no idea who she is. None whatsoever.  
11 It's a false accusation, and it's a disgrace that a  
12 magazine like New York -- which is one of the  
13 reasons it's failing. People don't read it anymore.  
14 So you're trying to get readership by using me.  
15 It's not good. You know, there were cases that the  
16 mainstream media didn't pick up, and I don't know if  
17 you've seen them, and they were put on Fox. But  
18 there were numerous cases where women were paid  
19 money to say bad things about me. You can't do  
20 that. You can't do that. And those women did wrong  
21 things, that women were actually paid money to say  
22 bad things about me. But here's a case. It's an  
23 absolute disgrace that she's allowed to do that."

24 You made that statement, correct?

25 A. Read the last part, please.

1 D. J. TRUMP

2 Q. "But here's a case. It's an absolute  
3 disgrace that she's allowed to do that."

4 A. Yes.

5 Q. Okay. And I'm going to ask the same  
6 questions I asked last time.

7 I take it you stand by that statement  
8 today?

9 A. Yes.

10 Q. Sitting here today, are you aware of any  
11 inaccuracies in your statement? I'm not asking  
12 about her allegation. About your statement.

13 A. No. I think it's pretty much fine. I  
14 can't -- I haven't reviewed it in great detail, but,  
15 you know, it was standing outside of a helicopter  
16 that was getting ready to take off. But, no, that  
17 was -- that -- the statement is, in my opinion,  
18 correct.

19 Q. Okay. And just so the record is clear,  
20 if at any point you come across any inaccuracies,  
21 please don't hesitate to let us know.

22 Let's go now to the third statement,  
23 which we're going to mark as DJT 22.

24 (DJT Exhibit 22 was marked for  
25 identification.)

1 D. J. TRUMP

2 BY MS. KAPLAN:

3 Q. You have in front of you, sir, a  
4 five-page document. The first page says in bold  
5 type "Exclusive: Trump vehemently denies  
6 E. Jean Carroll allegation. Says she's not my  
7 type."

8 It's from a publication known as The  
9 Hill. It's dated June 24, 2019, and it's attributed  
10 to the gentleman Jordan Fabian and -- or maybe not  
11 the gentleman. It's attributed to two people,  
12 Jordan Fabian and Saagar Enjeti. Do you see that?

13 A. Yes.

14 Q. So this is two days after the last  
15 statement we're looking at, which is on June 22nd.

16 Do you recall having an interview with  
17 reporters from The Hill on June 24, 2019?

18 A. Vaguely, yes.

19 Q. And do you recall where that interview  
20 took place?

21 A. I think it was in the Oval Office.

22 Q. And if you turn to page -- the first  
23 page -- it's really page 2 of the document I gave  
24 you. At the very top it says: "President said  
25 Monday that writer E. Jean Carroll was totally lying

1 D. J. TRUMP

2 when she recently accused him of raping her during  
3 an encounter in a New York department store in the  
4 mid-1990s." And then it talks about an exclusive  
5 interview with The Hill. Do you see that?

6 A. Yeah.

7 Q. And you're quoted just below that  
8 paragraph as saying as follows -- and this one I'll  
9 read: "I'll say it with great respect. Number one,  
10 she's not my type. Number two, it never happened.  
11 It never happened. Okay?"

12 And then the reporters say: "The  
13 president said, 'Well, see you behind the Resolute  
14 Desk in the Oval Office.'" Do you see that?

15 A. Yes, I do.

16 Q. And the statement that I just read that  
17 begins "I'll state with great respect," that was a  
18 statement that you made to the reporter for The Hill  
19 on June 24, 2019; correct?

20 A. Yes.

21 Q. And the same set of questions. I take  
22 it, sir, that you stand by that statement today?

23 A. Yes, I do.

24 Q. And I take it that from what we've been  
25 discussing so far that you don't see any

1 D. J. TRUMP

2 inaccuracies in that statement?

3 MS. HABBA: Objection to form.

4 You can answer.

5 THE WITNESS: No. No. She made up the  
6 story. It's a total lie. She knows it. She  
7 did it to sell a book, I guess, or something.

8 BY MS. KAPLAN:

9 Q. In your June 21 statement, which is DJT  
10 20, which is the Littman tweet, you referred to  
11 Ms. Carroll's claim as a false accusation?

12 A. Where is this?

13 Q. DJT 20.

14 A. Yeah.

15 Q. You say it's a false accusation; correct?

16 A. It's true.

17 Q. And in your June 22 statement made on  
18 your way to Camp David, you said that she made a  
19 false accusation and a totally false accusation;  
20 correct?

21 A. Yes.

22 Q. And in your interview with The Hill on  
23 June 24, you say that Ms. Carroll was totally lying  
24 and it never happened?

25 A. Correct.

1 D. J. TRUMP

2 Smith or by somebody within minutes; okay? So there  
3 were no complaints. There were no stories. There  
4 was no anything because it never happened. It's all  
5 fiction. It's a con job.

6 Q. So before you made your statements that  
7 it never happened in 2019, did you or anyone on your  
8 staff reach out to anyone at Bergdorf Goodman?

9 A. I didn't have to reach out to anybody  
10 because it didn't happen. And by the way, if it did  
11 happen, it would have been reported within minutes.  
12 You're talking about going to a major floor  
13 probably. I assume the most important floor, a  
14 major floor in a major department stores that's a  
15 very busy store, by the way, and checkout counters  
16 and everything else. And I would be in there? I  
17 mean, it's the most ridiculous -- it's the most  
18 ridiculous, disgusting story. It was just made up.

19 MS. HABBA: Just to clarify, the question  
20 is if he reached out to Bergdorf?

21 MS. KAPLAN: If he or anyone before he  
22 made the statement in June 2019.

23 MS. HABBA: If he directed anyone?

24 MS. KAPLAN: Did he or anyone working for  
25 him reach out to Bergdorf Goodman.



1 D. J. TRUMP

2 THE WITNESS: No.

3 BY MS. KAPLAN:

4 Q. After you made the statements that you  
5 made in June of 2019, did you or anyone working for  
6 you reach out to Bergdorf Goodman?

7 A. After the statement was made? No.

8 Q. No?

9 A. No. This would have been public years  
10 ago if it happened. Years ago, many people, very  
11 crowded store.

12 MS. HABBA: Obviously, just to make the  
13 record clear, we're not discussing any  
14 conversations he had with attorneys. That  
15 would be privileged.

16 MS. KAPLAN: But if you had the  
17 statement, you could say had the conversation,  
18 but I don't know what it was. That's fair.  
19 But other than that, I don't want to know. And  
20 I'm talking about Bergdorf Goodman. So I'm not  
21 asking about attorneys.

22 BY MS. KAPLAN:

23 Q. In your June 21 statement, which is --  
24 oh, Exhibit 20.

25 MS. KAPLAN: I thought you were

1 D. J. TRUMP

2 correcting the date. He kept saying 20.

3 BY MS. KAPLAN:

4 Q. In your June 21 statement that's marked  
5 as Exhibit 20, you say -- and this is the Littman  
6 tweet -- "I never met this person in my life."

7 A. Yes.

8 Q. Was that a true statement when you made  
9 it on June 21, 2019?

10 A. It was a true statement when I made it.  
11 I think subsequently or at some point they showed a  
12 picture on a receiving -- I was on a celebrity line  
13 for a charity, and I think I was either shaking her  
14 hand or her husband's hand on a receiving line.  
15 Like I say, I shake a lot of hands with people, but  
16 I had no idea who she was.

17 Q. So if I can understand your testimony,  
18 sir, you're saying that at the time you made the  
19 statement that's in DJT 20, you were not aware of  
20 ever having met Ms. Carroll? You have since seen a  
21 photograph that shows you with Ms. Carroll on a  
22 receiving line; correct?

23 A. Along with a lot of other people.

24 MS. HABBA: Objection to form.

25 THE WITNESS: This was a very public -- I

1 D. J. TRUMP

2 think it was a charity or a celebrity event or  
3 something. And I think that's her big claim to  
4 fame, you know, that she shook my hand at some  
5 celebrity event.

6 BY MS. KAPLAN:

7 Q. So the answer to my question is yes, that  
8 after you made the statement, you became aware that  
9 there's a photo of you with Ms. Carroll in a  
10 receiving line; correct?

11 A. At some point.

12 Q. Okay.

13 A. I saw there was a photo on a receiving  
14 line, yes.

15 Q. Okay.

16 MS. KAPLAN: Let's mark the photo. What  
17 number are we on?

18 (DJT Exhibit 23 was marked for  
19 identification.)

20 BY MS. KAPLAN:

21 Q. You have in front of you a black and  
22 white photograph that we've marked as DJT 23. And  
23 I'm going to ask you: Is this the photo that you  
24 were just referring to?

25 A. I think so, yes.

1 D. J. TRUMP

2 Q. And do you recall when you first saw this  
3 photo?

4 A. At some point during the process, I saw  
5 it. I guess that's her husband, John Johnson, who  
6 was an anchor for NBC. Nice guy, I thought. I  
7 mean, I don't know him, but I thought he was pretty  
8 good at what he did. I don't even know the woman.  
9 I don't know who -- it's Marla.

10 Q. You're saying Marla is in this photo?

11 A. That's Marla, yeah. That's my wife.

12 Q. Which woman are you pointing to?

13 MS. HABBA: No, that's Carroll.

14 THE WITNESS: Oh, I see.

15 BY MS. KAPLAN:

16 Q. The person you just pointed to was  
17 E. Jean Carroll.

18 MS. HABBA: That's your wife.

19 BY MS. KAPLAN:

20 Q. And the person -- the woman on your right  
21 was --

22 A. I don't know. This was the picture. I  
23 assume that's John Johnson.

24 MS. HABBA: That's Carroll.

25 THE WITNESS: That's Carroll? Because

1 D. J. TRUMP

2 A. No. I don't know how I even knew she was  
3 married to him. At some point I heard that she was  
4 married to John Johnson, who I knew as an announcer  
5 or anchor, I thought, for ABC.

6 Q. Now, in your June 21 statement, which  
7 is -- in your June 21 statement, which is DJT 20,  
8 you said that Ms. Carroll was trying to sell a new  
9 book and that you said shame on those who make up  
10 false stories of assault to try to get publicity for  
11 themselves or sell a book?

12 A. Yeah, that's right.

13 Q. Before you made that statement, did you  
14 have any knowledge one way or the other of the  
15 financial arrangements between Ms. Carroll and the  
16 publisher of her book?

17 A. No.

18 Q. Did you even know who her publisher was?

19 A. No.

20 Q. Did you ever see her book contract?

21 A. No.

22 Q. Did you know anything about Ms. Carroll's  
23 financial situation?

24 A. No.

25 Q. Did you know anything about her expected

1 D. J. TRUMP

2 book sales?

3 A. No idea.

4 Q. Before you made this statement, do you  
5 know if you or anyone working for you went on to --  
6 withdrawn.

7 Before you made this statement that  
8 appears in DJT 20, do you know whether you or anyone  
9 working for you did any research on Ms. Carroll?

10 A. I just don't know. It's possible  
11 somebody -- when they heard this horrible  
12 accusation, it's possible that somebody did a little  
13 quick research but not that I know of.

14 Q. Another thing that you say in your June  
15 21 statement is that Ms. Carroll was trying to carry  
16 out a political agenda?

17 A. Yeah.

18 Q. How did you know she had a political  
19 agenda if you didn't know who she was?

20 A. Somebody told me early on that she was  
21 somehow aligned with Hillary Clinton. She was  
22 either aligned with her or -- I thought aligned with  
23 her.

24 Q. Who told you that?

25 A. I think you're aligned with her too

1 D. J. TRUMP

2 actually.

3 Q. Who told you that?

4 A. Somebody had mentioned it.

5 Q. Do you recall who?

6 A. I don't know. I don't know who said it,  
7 but somebody had mentioned it since, that she was  
8 somehow into that whole world.

9 Q. And you just said "I don't know who -- I  
10 don't know who said it, but somebody has mentioned  
11 it since"?

12 A. No. I meant since the accusation.

13 Q. Oh, since the accusation.

14 Do you remember what that person told you  
15 if you don't --

16 A. Just mentioned that they thought she was  
17 somewhat political and aligned with Hillary Clinton.

18 Q. Before issuing your statement on June 21,  
19 did you learn what political party Ms. Carroll  
20 belonged to?

21 A. No, I didn't know that.

22 Q. Before you issued your June 21 statement,  
23 did you have any documents indicating that she was  
24 pursuing a political agenda?

25 A. No.

1 D. J. TRUMP

2 Q. At the end of your statement, your June  
3 21 statement, you say: "If anyone has information  
4 that the Democratic party is working with  
5 Ms. Carroll or New York Magazine, please notify us  
6 as soon as possible."

7 Did anyone ever notify you --

8 A. I don't know.

9 Q. Sitting here today, you can't recall  
10 anyone who notified you?

11 A. I don't know, yeah.

12 Q. Now --

13 MS. KAPLAN: Oh, it's noon. Leah, I know  
14 you wanted to stay on schedule. Did you want  
15 to break now?

16 MS. HABBA: Okay --

17 THE WITNESS: No. No. I'd rather finish  
18 this up.

19 MS. HABBA: How much more time do you  
20 have?

21 MS. KAPLAN: Oh, I'm not going to be  
22 done, but I can get through this section in  
23 probably five or ten minutes.

24 MS. HABBA: Yeah, go ahead.

25



1 D. J. TRUMP

2 BY MS. KAPLAN:

3 Q. Now, in your June 22nd statement, which  
4 appears -- which we've marked as DJT 21, you claim  
5 that Ms. Carroll had falsely accused other men of  
6 sexual assault; correct?

7 A. That's what I heard, yes.

8 Q. And you believed that was a true claim?

9 A. It's what I heard.

10 Q. From whom had you heard it?

11 A. I don't know. I don't know.

12 Q. What other --

13 A. Doesn't she even write about it in her  
14 book? Did I hear that too? She talks about other  
15 men in the book.

16 Q. So from -- you don't remember who told  
17 you this?

18 A. Nope. That's just what I heard.

19 Q. And she does talk about other men in her  
20 book, but who told you that what she says about the  
21 other men in her book is false?

22 A. I don't know. I just heard she -- I  
23 didn't read her book. I never saw her book until  
24 now, but I heard she talked about other men in the  
25 book. And I had heard she accused other men of

1 D. J. TRUMP

2 things.

3 Q. And you say you'd heard that she had  
4 accused other men of things in her book?

5 A. Not in her book -- it could be in the  
6 book but maybe outside of the book. But that she's  
7 been -- you know, she's accused other men of things.

8 Q. Okay. Did whoever told you that she  
9 accused other men of things also tell you that all  
10 those accusations were false?

11 A. No.

12 Q. Did they tell you that --

13 A. It was a statement made. I don't even  
14 know who made it, but I had heard that she was --  
15 that she's accused other men of things, yeah.

16 Q. Did anyone tell you that any of the men  
17 she has accused of other things -- withdrawn.

18 Did anyone tell that you that the  
19 accusations she has made about other men were false?

20 A. I don't know. Just -- I just heard  
21 that -- I just heard that she accused other men of  
22 things. Maybe that's true; maybe it's not. I just  
23 don't know. That was just something that I heard.

24 Q. And you'd agree with me, would you not,  
25 that sometimes women make accusations against men

1 D. J. TRUMP

2 physically; right?

3 A. I saw her in a picture. I didn't know  
4 what she looked like, and I said it -- and I say it  
5 with as much respect as I can, but she is not my  
6 type.

7 Q. And, again, when you say "type," you just  
8 referred to looking at photos. So you mean  
9 physically she's not your type?

10 A. Physically she's not my type, and now  
11 that I've gotten indirectly to hear things about  
12 her, she wouldn't be my type in any way, shape, or  
13 form.

14 Q. But when you were talking back on June  
15 24th, you were referring to her not being your type  
16 physically; correct?

17 A. I saw a photo of her.

18 Q. Okay.

19 A. And the only difference between me and  
20 other people is I'm honest. She's not my type.

21 Q. Do you recall what photo you saw of her  
22 before you made that statement?

23 A. No. No. I saw a photo after the --  
24 after her ridiculous accusation was made, I got to  
25 see a photo -- somebody --

1 D. J. TRUMP

2 allegedly made?

3 A. Just a general statement.

4 Q. Okay. Now, I'm going to go through a  
5 list of people who I think you may have spoken to  
6 about Ms. Carroll's allegations or this lawsuit. I  
7 want to do this carefully. So what I first want to  
8 just ask you is -- I want to give you the person's  
9 name, and you can tell me, yes or no, you spoke to  
10 them. And if it's yes, I may have some follow-up  
11 questions but --

12 A. Okay.

13 MS. HABBA: Just so that I don't have to  
14 object on every ground, obviously executive  
15 privilege. I don't want to go into the  
16 substance of any conversations with any of his  
17 advisers or anyone while he was in the  
18 White House.

19 MS. KAPLAN: I understand that. Let's  
20 take it question by question.

21 MS. HABBA: Sure.

22 BY MS. KAPLAN:

23 Q. Did you ever communicate about  
24 Ms. Carroll or this lawsuit with Dan Scavino?

25 A. I don't remember having done so. It's

1 D. J. TRUMP

2 possible, but I don't remember having done so.

3 Q. Same question for Nicholas Luna.

4 A. I sort of doubt it. I don't think so.

5 Q. Molly Michael?

6 A. I don't think I talked about it  
7 specifically. It's possible, but I don't think so.

8 Q. Hope Hicks?

9 A. No. Pretty sure no.

10 Q. Adam Kennedy?

11 A. Say it again. Who?

12 Q. Adam Kennedy?

13 A. I don't think so.

14 Q. Derek Lyons?

15 A. Pretty sure no.

16 Q. Sara Sanders?

17 A. No.

18 Q. Stephanie Grisham?

19 A. I don't remember exactly. I think -- I  
20 don't -- it's possible I said something. I don't  
21 know. I really don't -- not much.

22 Q. Judd Deere?

23 A. Who?

24 Q. Judd Deere.

25 A. Not that I remember.

1 D. J. TRUMP

2 Q. Nick Mulvaney?

3 A. Not that I remember.

4 Q. Emma Doyle?

5 A. Not that I remember.

6 Q. Heidi Stirrup?

7 A. Not that I remember.

8 Q. Kayleigh McEnany?

9 A. Not that I remember.

10 Q. Erin Perrine?

11 A. Not that I remember.

12 Q. Sarah Matthews?

13 A. Not that I remember.

14 Q. Daniel -- I hope I'm pronouncing this

15 right -- Bucheli, B-U-C-H-E-L-I?

16 A. Not that I remember.

17 Q. Tim Murtaugh?

18 A. Some of these people I don't even know.

19 Q. Okay.

20 A. You're asking me names I don't even know.

21 Q. Well, if you don't know, tell me just so

22 the record is clear.

23 A. Go ahead.

24 Q. Tim Murtaugh?

25 A. No.

1 D. J. TRUMP

2 Q. Matt Wolking?

3 A. No.

4 Q. Zach Parkinson?

5 A. No. I say -- when I say no, I mean I  
6 really have to say not that I remember but --

7 Q. Okay.

8 A. -- pretty much not that I remember.

9 Q. Okay. And in addition to -- let me make  
10 sure I got through the list. Oh, no. I'm not done.  
11 Sorry.

12 Jared Kushner?

13 A. Did I ever speak to him about it?

14 Q. Yeah.

15 A. I don't think so.

16 Q. Your daughter.

17 A. I told my daughter that this was a --  
18 MR. MADAIIO: She's just asking whether or  
19 not you had a conversation about it.

20 MS. HABBA: I don't want you to answer.  
21 It's privileged.

22 THE WITNESS: I mentioned it briefly.

23 BY MS. KAPLAN:

24 Q. Either of your sons?

25 A. I don't think so.

1 D. J. TRUMP

2 Q. And by the sons, I mean your adult sons.

3 A. Yeah. I don't think so.

4 Q. Your current wife?

5 A. Yeah.

6 Q. Okay. And I'm just going to use  
7 categories. In addition to the people that I  
8 mentioned, do you recall any conversations with  
9 anyone in the legislative branch -- and by that I  
10 mean the House or the Senate or people who work  
11 there.

12 A. Well, it's probable that I told people  
13 that there was a false, disgusting lie made about me  
14 because I would say that to a lot of people. Even  
15 if they didn't ask, I was very offended by this.  
16 This woman is sick. There's something wrong with  
17 her, and it's a false story. So I would go around  
18 saying that to people, yes. So it's possible that I  
19 would say that to legislators.

20 Q. What about people in the executive branch  
21 who I didn't mention?

22 A. No. I mean, I think you mentioned a lot  
23 of people.

24 Q. I did, and I take it -- what about anyone  
25 else who worked on your presidential campaign?



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2 Q. Do you recall telling any other woman  
3 that if they had been assaulted as Ms. E. Jean  
4 describes it in a dressing room, that woman would  
5 have fought back?

6 MS. HABBA: Objection.

7 THE WITNESS: No, I don't remember saying  
8 that. I don't remember that. But I didn't --  
9 I don't think I said that. But if you read --  
10 if you see her interview with Anderson Cooper,  
11 she's talking about this not only not being an  
12 assault, but she said other things that were  
13 frankly crazy in terms of what -- that  
14 interview, to me, made her look like, number  
15 one, a liar, and, number two, like she was off.  
16 There's something a little off with her  
17 mentally.

18 BY MS. KAPLAN:

19 Q. So you said a couple of answers ago that  
20 you would have told -- excuse me -- that you did  
21 tell people that if this had happened in a dressing  
22 room of a crowded department store, people would  
23 have heard it, and people would have asked what the  
24 hell is going on.

25 A. Yeah. I would say that that would be

1 D. J. TRUMP

2 reporters by email, there's a designated group, and  
3 it always goes to the same --

4 A. I don't know how they do that, but it  
5 goes to the press.

6 Q. Why did you decide to issue the statement  
7 on Truth Social on October 12th?

8 A. Because I was offended at this woman's  
9 lie. Because I was offended that she could just  
10 make up a story out of cold air, refuted by her  
11 testimony on CNN, but that she could make up a story  
12 just out of nowhere and that I get a phone call  
13 asking me about this ridiculous situation. The  
14 woman -- there's something wrong with her in my  
15 opinion. Okay. But it's a false accusation. Never  
16 happened, never would happen. And I posted and I  
17 will continue to post until such time as -- and then  
18 I will sue her after this is over, and that's the  
19 thing I really look forward to doing. And I'll sue  
20 you too because this is -- how many cases do you  
21 have? Many, many cases, and I know the statements  
22 that were made -- that you made. Keep Trump busy  
23 because this is the way you defeat him, to keep him  
24 busy with litigation. So I will be suing you also,  
25 but I'll be suing her very strongly as soon as this

1 D. J. TRUMP

2 Ms. Carroll; right?

3 A. That's right.

4 Q. And at the deposition in another case  
5 where I was here, you referred to, as I recall,  
6 Ms. Carroll as Madam Bergdorf Goodman. Same idea;  
7 right?

8 A. Same concept, yeah.

9 Q. Now, when you say in here I don't know  
10 this woman and have no idea who she is, even though  
11 you're using the present tense, you're referring  
12 back to your knowledge as of when she first made the  
13 allegation --

14 A. I still don't know this woman. I think  
15 she's a wack job. I have no idea. I don't know  
16 anything about this woman other than what I read in  
17 stories and what I hear. I know nothing about her.

18 Q. Okay. Well, I guess the distinction I'm  
19 trying to make, sir, is that when the allegation  
20 came out in 2019, you said you -- I think it's your  
21 testimony that you had no idea who she was.

22 A. I still don't.

23 Q. Well, today you at least know that she's  
24 a plaintiff in a case suing you; correct?

25 A. Oh, yes. That, I know, but I know

1 D. J. TRUMP

2 you better watch the interview.

3 Q. In the interview when Ms. Carroll talked  
4 about rape being sexy, isn't it true that she said  
5 that's a view that many other people hold?

6 A. Oh, I don't know. I mean, I don't know.  
7 All I know is I believe she said rape is sexy or  
8 something to that effect, but you'll have to watch  
9 the interview. It's been awhile.

10 Q. And just to clarify, I think you said a  
11 few minutes earlier that you used the word "swooned"  
12 as a synonym for -- you said the F word -- for  
13 sexual intercourse?

14 A. Yeah. That's because that's what she  
15 said.

16 Q. What do you mean? She never used the  
17 word "swooned."

18 A. No. She said that I did something to her  
19 that never took place. There was no anything. I  
20 know nothing about this nut job.

21 Q. Okay. Then you go on to say in the  
22 statement: "And while I am not supposed to say it,  
23 I will." Why were you not supposed to say it?

24 A. Because it's not politically correct to  
25 say -- read the next. Go ahead. That she's not my

1 D. J. TRUMP  
2 type? Yeah. Because it's not politically correct  
3 to say it, and I know that, but I'll say it anyway.  
4 She's accusing me of rape, a woman that I have no  
5 idea who she is. It came out of the blue. She's  
6 accusing me of rape -- of raping her, the worst  
7 thing you can do, the worst charge.

8 And you know it's not true too. You're a  
9 political operative also. You're a disgrace. But  
10 she's accusing me and so are you of rape, and it  
11 never took place. And I will tell you I made that  
12 statement, and I said, while it's politically  
13 incorrect, she's not my type. And that's  
14 100 percent true. She's not my type.

15 Q. And when you say "not my type," you want  
16 people -- your intention of saying -- withdrawn.

17 The point of saying she's not my type is  
18 to persuade people that you didn't rape her because  
19 she wasn't attractive enough; correct?

20 MR. MADAIIO: Object to the form.

21 MS. HABBA: Objection to the form.

22 THE WITNESS: When I say she's not my  
23 type, I say she is not a woman I would ever be  
24 attracted to. There is no reason for me to be  
25 attracted to her. I just -- it's not even

1 D. J. TRUMP

2 meant to be an insult. There's no way I would  
3 ever be attracted to her. Now, some people  
4 would be attracted to her perhaps. I would  
5 never be attracted to her.

6 So in addition to the fact that it never  
7 happened, never could happen -- so I say it's  
8 politically incorrect to say essentially she's  
9 not my type on top of everything else.

10 BY MS. KAPLAN:

11 Q. So you also have a reference -- you  
12 have -- withdrawn.

13 At the top of the thing, you say Peekaboo  
14 James?

15 A. Yes.

16 Q. I assume that's the New York attorney  
17 general, Letitia James?

18 A. Or New York State attorney general.

19 Q. Yes.

20 A. You know, your friend Cuomo knows her.

21 Q. And then you talk --

22 A. You should ask Andrew. If you want a  
23 definition, ask Andrew about her. I think  
24 you've been through a lot.

25 Q. And then you talk about the judge, and

1 D. J. TRUMP

2 many times hoax by all these people, the scum  
3 that we have in our country, lying to Congress  
4 hoax, the spying on my campaign hoax. They  
5 spied on my campaign, and now they admit it.  
6 That was another hoax, and I could get a whole  
7 list of them. And this is a hoax too.

8 BY MS. KAPLAN:

9 Q. This -- when you say "this" and "that" --

10 A. This ridiculous situation that we're  
11 doing right now. It's a big, fat hoax. She's a  
12 liar and she's a sick person in my opinion. Really  
13 sick. Something wrong with her.

14 Q. Okay. In addition to the Russia Russia  
15 Russia hoax, the Ukraine Ukraine Ukraine hoax, the  
16 Mueller or Mueller hoax, the lying to FISA hoax, the  
17 lying to Congress hoax, and the spying on your  
18 campaign hoax, isn't it true that you also referred  
19 to the use of mail-in ballots as a hoax?

20 A. Yeah, I do. Sure.

21 MS. HABBA: Objection.

22 THE WITNESS: I do. I think they're very  
23 dishonest. Mail-in ballots, very dishonest.

24 BY MS. KAPLAN:

25 Q. And isn't it true that you yourself have

1 D. J. TRUMP

2 talked about Ms. Leeds.

3 What else did you know about Ms. Leeds  
4 that would indicate to you that she was -- would not  
5 have been your first choice other than how she  
6 looked?

7 A. I don't know. I think I probably saw her  
8 on television or something.

9 But -- I don't want to be insulting, but  
10 when people accuse me of something, I think I have a  
11 right to be insulting, because they're insulting me.  
12 They're doing the ultimate insult. They make up  
13 stories and then I'm not allowed to speak my mind?  
14 No, I disagree with that.

15 She would not have been anywhere on a  
16 list. I just -- just wouldn't have been for me.

17 It's disgusting. What she said was  
18 disgusting.

19 Can you imagine doing that on an  
20 airplane, what she said? I'm doing that on an  
21 airplane? That's almost as ridiculous as doing it  
22 in Bergdorf Goodman in a dressing room.

23 Q. Now, you just testified at some length,  
24 sir, that Ms. Leeds would have remembered the date  
25 or the flight that she was on when she says this



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2 You wanted people to think that; no?

3 A. All I wanted people to know is that this  
4 false story, which is a false, made-up story -- she  
5 made it up probably to sell her book or for her own  
6 ego, because she's, I think -- again, I've said it  
7 before. I think she's a very deranged, sick person,  
8 to make it up.

9 And I look forward to suing her at the  
10 appropriate time.

11 Q. And are you aware, if you look at page 5  
12 of the document in front of you, sir, that  
13 Ms. Humphreys has calculated that what it would cost  
14 to run a corrective campaign to remedy Ms. Carroll's  
15 reputation from the things you have said and the  
16 follow-up millions and millions of times would be in  
17 the range of 9.9 and \$12.5 million?

18 A. This is nonsense. Okay? She made a  
19 statement about me and I responded to her statement.  
20 That's it.

21 Because we could go the other way.  
22 What's it costing me? What will it cost me to get  
23 my reputation back before a wacky person that made  
24 up a story that I took her up to a department store  
25 into a little room with people all over the place

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2 and raped her? That's a sick woman that would say  
3 that. Only a sick -- there's something wrong with  
4 her.

5 And I believe she did it because of her  
6 book. She never mentioned it for years and years  
7 and she doesn't know when it took place, how it  
8 took -- she doesn't know anything. She has no idea  
9 what season it took place, what day it took place,  
10 what year it took place.

11 And I have every right to clear my  
12 reputation.

13 Q. And all of the other women who have made  
14 such accusations against you, including the 24 that  
15 your campaign cited, they're all sick, too; right?

16 A. I don't know about any of these people or  
17 very many of them. I mean, every once in a while,  
18 you get -- I think a lot of famous people have  
19 charges thrown at them, and many of them are false  
20 and some of them are true.

21 But in my case --

22 Q. None of it is true?

23 A. I would say. I mean, I don't see any. I  
24 mean, you haven't shown me anything. I don't even  
25 know what you're even talking about when you say