

# **EXHIBIT 3**

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 A. Other people in the press, yes.

3 Q. If you could read -- if you're able to --  
4 and I apologize for the size of the text.

5 If you could read that statement into the  
6 record.

7 A. You want me to read the whole thing?

8 Q. Please.

9 A. It's a very unclear copy. Do you have a  
10 better copy of it?

11 Q. I think this is the best we have. I  
12 could read it in. I'll read it in.

13 A. Yeah, why don't you read it in.

14 Q. It says: "Statement from President  
15 Donald J. Trump. Regarding the 'story' by  
16 E. Jean Carroll claiming she once encountered me at  
17 Bergdorf Goodman 23 years ago, I've never met this  
18 person in my life. She's trying to sell a new book.  
19 That should indicate her motivation. It should be  
20 sold in the fiction section. Shame on those who  
21 make up false stories of assault, who try to get  
22 publicity for themselves or sell a book or carry out  
23 a political agenda like Julie Swetnick, who falsely  
24 accused Justice Brett Kavanaugh. It's just as bad  
25 for people to believe it, particularly when there is

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zero evidence. Worse still for a dying publication to try to prop itself up by pedaling fake news. It's an epidemic. Ms. Carroll in New York Magazine: No pictures, no surveillance, no videos, no reports, no sales attendants around??? I would like to thank Bergdorf Goodman for confirming they have no video footage of any such incident because it never happened. False accusations diminish the severity of real assault. All should condemn false accusations and any actual assault in the strongest possible terms. If anyone has information that the Democratic party is working with Ms. Carroll or New York Magazine, please notify us as soon as possible. The world should know what's really going on. It's a disgrace, and people should pay dearly for such false accusations." Do you see that? That's what you have in front of you?

A. Yeah.

Q. And I think you've already confirmed that this is a statement that you gave to someone on your staff to give to the press?

A. Yeah.

Q. And that's how it ended up in Laura Littman's tweets?



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A. Perhaps, yes.

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

A. Yes.

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

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

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

A. My lawyers told me that.

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

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2 took place because it didn't take place.

3 BY MS. KAPLAN:

4 Q. So your answer to my question is, no, you  
5 don't have any witnesses?

6 A. If you could give me a date, I could  
7 check on security because I traveled with security  
8 quite a bit, and I would have somebody from security  
9 confirm a statement that it never happened.

10 Q. Is it your testimony, sir, that you  
11 always walked around New York City during the period  
12 late 1995 and early 1996 with security? Is that  
13 your statement?

14 A. Pretty much, yes.

15 Q. Pretty much isn't always. Is that your  
16 testimony?

17 MS. HABBA: Objection.

18 THE WITNESS: I would say pretty much to  
19 always, yeah. I always have a security person  
20 with me.

21 BY MS. KAPLAN:

22 Q. Okay. Who would have been your security  
23 person in late 1995, early 1996?

24 A. Well, I had many. I had many people. So  
25 I would go with many, but if you could give me a

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2 clarify for the record. If we can read from  
3 the complaint the actual record. I believe it  
4 says fall of 1995 --

5 MS. HABBA: It says fall of 1995 and the  
6 spring of 1996.

7 BY MS. KAPLAN:

8 Q. Yeah. Do you know who your security  
9 people were from the fall of 1995 through the spring  
10 of 1996?

11 MS. HABBA: Objection. Asked and  
12 answered.

13 BY MS. KAPLAN:

14 Q. You can answer again.

15 A. I'll find out. I'll check. If I can,  
16 I'll find out. I'll have people ask.

17 Q. That information should have been  
18 provided long ago, but if you have it, we would like  
19 to see it.

20 When you made your statements that  
21 Ms. Carroll's accusation was false and that it never  
22 happened, do you recall you or anyone working for  
23 you looking at any documents before those statements  
24 were made?

25 A. No. They wouldn't be in documents. It



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wouldn't be because it never happened, number one.

But there wouldn't be documents.

Q. Just so the record is clear, other than the possibility of security guards, can you think of any other persons who would be witnesses to -- who could confirm your account that Ms. Carroll's allegation was false?

A. That could confirm my account that nothing happened?

Q. Correct. Anyone other than security?

A. I would have to look for people, but, you know, you're asking them to confirm that something didn't happen. In other words, you're asking them to confirm that they never saw anything happen, and they didn't because it didn't happen. It's a lie.

Q. Again, I'm just trying --

A. It's a made-up story. It's a fairy tale.

Q. I'm trying to get the answer. If you could answer my question, the question I asked, we'd get through this quicker.

MS. HABBA: I think I'm just going to object and state for the record that the client's made clear that he can't find people to say something that didn't happen didn't



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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.

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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

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actually.

Q. Who told you that?

A. Somebody had mentioned it.

Q. Do you recall who?

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

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

A. No. I meant since the accusation.

Q. Oh, since the accusation.

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

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

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

A. No, I didn't know that.

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

A. No.



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2 with something that's called an interrogatory?

3 A. Go ahead. Give me a definition.

4 Q. An interrogatory are written questions  
5 that attorneys ask the other side, and then written  
6 answers are provided.

7 Are you familiar with that general  
8 concept?

9 A. Yes.

10 Q. Okay. I'm going to show you your  
11 interrogatory responses in this case.

12 MS. KAPLAN: We're going to mark it as

13 25.

14 (DJT Exhibit 25 was marked for  
15 identification.)

16 THE WITNESS: Okay. Go ahead.

17 BY MS. KAPLAN:

18 Q. So if you turn to page 2, you'll see  
19 about a quarter of the way down it says Number 2  
20 under the header "Supplemental Responses and  
21 Objections to Interrogatories," and 2 reads:  
22 "Identify all individuals with whom you have  
23 communicated by any means concerning the plaintiff  
24 or this action." And I'll represent to that you  
25 that's E. Jean Carroll or this case, and then

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there's a lot of objections. And then subject to those objections, there's names listed, and it starts with Dan Scavino.

You had told me a few minutes ago that you couldn't remember, but it's possible that you spoke to Mr. Scavino. Does this refresh your recollection?

A. No. I mean, it is possible.

Q. Okay. Nicholas Luna. You had said I doubt it, but he appears in these interrogatories?

A. It's possible.

Q. Molly Michael I think you told me you spoke to. So that checks.

A. Yeah.

Q. Hope Hicks. You had said no, and she appears in this interrogatory.

A. I'd say less likely.

Q. Less likely --

A. I mean, I would say no, but her name is here. So they put the name, but I would say anything is possible with any of these people. These are the people that I deal with.

Q. Derek Lyons. You said pretty sure no and then --

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A. Derek Lyons I think -- I'm fairly sure, but, again, it's possible that I did. But I think -- I think no.

Q. And then Jared Kushner. I think your answer to me was I don't think so, and then his name appears?

A. I don't think so, but it's possible that I spoke to him.

Q. Did you review this document prepared by your attorneys before it was submitted? This was on August 23rd.

A. Yes, very quickly. I don't know if I signed it. Did I sign it?

Q. No. It's signed by --

A. No. I didn't sign it, but I reviewed it, I guess, in concept. I didn't sign it. When I sign something, I guess maybe I look at it more closely. But I didn't sign this. I'm not sure. I was told about the document.

Q. And so --

A. It was just a refutation. That's -- because this was something that never happened, as you know very well.

Q. Well, this question isn't about whether



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or not it happened or not, sir. It's a question about --

A. Let's go. Let's go.

Q. Well, again, this interrogatory is about who you spoke to, and your answers have been somewhat inconsistent --

A. Yeah.

Q. -- between this interrogatory and what I heard today, so what I'm trying to understand is what's your position as of today.

And I take it -- and you can correct me if I'm wrong -- that your position as of today is what you've said here at this deposition; correct?

A. The deposition rules. That's correct. Because this is not signed by me. This is signed by somebody else.

Q. Okay. Okay. Now, a woman by the name of Stephanie Grisham served as your press secretary and communications director from July 1, 2019, to April 7, 2020; correct?

A. Yeah.

Q. And before that she had served as the press secretary for the First Lady?

A. Yes.

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Q. Does that refresh your recollection that Stephanie Grisham's promotion was announced on or about June 25th --

A. Yeah. Sure.

Q. Now, the reason I ask is because June 25th was one day after the statements that you made to The Hill reporters, which is DJT 22. So it's fair to say that at the time of the promotion, the issue of E. Jean Carroll and her allegations was front of mind; fair?

A. Well, I had many other things happening, too, in case you're not aware. So the E. Jean Carroll thing was so false and so ridiculous that I put out a statement, and that was it. I want people to know that it never happened.

But we had a lot of other things happening like China, like Russia, like Ukraine, like inflation, like a lot of other things that we did a great job on. This was not the only thing on my mind.

Q. I certainly understand that, sir, but --

A. I'm sure you do.

Q. -- you'll agree with me, will you not, that the third statement you made, which was on June

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

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

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

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



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2 case ends. But I'll be suing you also.

3 Q. Are you done?

4 A. Yeah.

5 Q. Is there anything in particular that  
6 prompted you to make this statement last week?

7 A. Yeah. Her false story and that I have to  
8 waste a whole day doing these ridiculous questions  
9 with you.

10 Q. Okay.

11 MS. KAPLAN: Let's look at the statement.  
12 Let's mark it as -- what's my next number?

13 MR. MADAIIO: DJT 28.

14 (DJT Exhibit 28 was marked for  
15 identification.)

16 THE WITNESS: I can't read this.

17 MS. KAPLAN: Well, we have a blown-up  
18 version.

19 BY MS. KAPLAN:

20 Q. Let's mark it as 28 and 28A.

21 Oh, so you have a document that's got --  
22 let me back up. I'm not following my own rules that  
23 it's not a conversation.

24 So what we have in front of you as DJT  
25 28, sir, is the post as it appeared on Truth Social

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

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

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

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

MR. MADAIIO: Object to the form.

MS. HABBA: Objection to the form.

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

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you talk about the justice system being broken;  
correct?

A. Yeah. The system in our country is  
broken, and the system in New York City is broken,  
in New York and New York State. It's a broken  
system.

Q. And isn't the reason, sir, that you  
issued this statement in the evening of October 12th  
because the judge in this case denied your motion to  
stay discovery that day?

A. I have no idea. It could be. I mean, it  
could be a factor, but, no, I just issued this  
because I knew it was coming up. I knew that we'd  
be wasting a day doing this, a whole day doing this.  
I don't know how you do it. You've got to be  
connected to get this kind of a time. But a whole  
day doing this stuff on something that never  
happened.

Q. So is it your testimony that it's just a  
coincidence that you issued this on the same day  
that Judge Kaplan denied the stay?

A. I don't know what day he issued it, but  
he issued something that was, I guess, somewhat  
negative. No. He's not a fan of mine obviously,



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2 And I apologize. I'm hoping the  
3 technology works better.

4 (DJT Exhibit 35 was marked for  
5 identification.)

6 (Video played.)

7 BY MS. KAPLAN:

8 Q. That's you in that video, speaking?

9 A. Yes, correct.

10 Q. And am I correct that video was recorded  
11 in January -- withdrawn.

12 Am I correct that that video was recorded  
13 September of 2005?

14 A. I guess that would -- don't know the  
15 date. But whatever date it was is fine with me.

16 Q. And am I correct that you were engaged to  
17 your current wife sometime in 2004?

18 A. I don't know.

19 Q. Am I correct that you married your  
20 current wife in January 2005?

21 A. I don't know relative to that tape, no.

22 Q. Well, relative to that tape, isn't it  
23 true you were married to your current wife?

24 A. I don't know. I don't know when the tape  
25 was done.

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2 Isn't it true that -- withdrawn.

3 When you say in this tape you moved on  
4 her heavily, what you're trying to say is that you  
5 tried to have sex with her; correct?

6 MS. HABBA: Objection. Form.

7 THE WITNESS: Well, no, actually, I said  
8 I didn't. And I said I didn't succeed with it.

9 And this was very heavily litigated  
10 during the campaign, and as you probably heard,  
11 I won. I beat your friend pretty badly and got  
12 more votes, got -- we did a good job.

13 But this was very heavily litigated. In  
14 fact, it was the first question of one of the  
15 debates, and it went on for a while. And at  
16 the end, the public said that's the one we want  
17 for the president.

18 And they made the right decision,  
19 obviously, based on what you're looking at  
20 today and what you were looking at two years  
21 ago.

22 BY MS. KAPLAN:

23 Q. Okay. But this isn't a debate or a  
24 presidential debate --

25 A. No, but this was litigated already by the

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Q. Did you pay for the furniture?

A. No, I didn't. I didn't buy her anything, actually.

Q. And you say -- and again, this has become very famous -- in this video, "I just start kissing them. It's like a magnet. Just kiss. I don't even wait. And when you're a star, they let you do it. You can do anything, grab them by the pussy. You can do anything."

That's what you said; correct?

A. Well, historically, that's true with stars.

Q. True with stars that they can grab women by the pussy?

A. Well, that's what -- if you look over the last million years, I guess that's been largely true. Not always, but largely true. Unfortunately or fortunately.

Q. And you consider yourself to be a star?

A. I think you can say that, yeah.

Q. And -- now, you said before, a couple of minutes ago, that this was just locker room talk?

A. It's locker room talk.

Q. And so does that mean that you didn't



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Ms. Leeds' allegations at campaign events in 2016?

A. I might have. I thought it was so like your client, I thought it was so ridiculous.

Q. Let's take a look at the next video, which is DJT 38.

(DJT Exhibit 38 was marked for identification.)

(Video played.)

BY MS. KAPLAN:

Q. When you said --

A. Is that finished now?

Q. When you said in that video that Ms. Leeds would not be your first choice, you were referring to her physical looks; correct?

A. Just the overall, not -- I looked at her. I see her. I hear what she says. Whatever. You wouldn't be a choice of mine, either, to be honest with you. I hope you're not insulted. I wouldn't under any circumstances have any interest in you. I'm honest when I say it.

She, I would not have any interest in.

Q. Well, other than her looks, did you know anything about -- withdrawn.

I'm an attorney in cases suing you.

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A. Yeah.

Q. But with respect to Ms. Leeds, did you know anything about what she did or what her past life was?

A. Even if you weren't suing me, I would have no interest. Okay?

And with Ms. Leeds, I watched her. I guess I saw her interview.

I mean, the whole concept of it. I'm sitting on a plane. I'm very well known. Very, very well known even then. It was a long time ago.

And all of a sudden -- and I think she said this making out with her went on for quite a while. So why didn't she leave? Why didn't she scream? Why didn't she do something?

And she wasn't able -- as I remember it -- I'm going -- I haven't read this again, because I haven't seen this in years, but I believe she said she didn't know where the plane was, where the flight was, because I don't remember ever sitting next to her. I don't think I did ever sit next to her. I think she made that up, too.

But she couldn't find tickets. She couldn't find anything. She didn't know where the

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(DJT Exhibit 39 was marked for  
identification.)

(Video played.)

BY MS. KAPLAN:

Q. So in that video, you're talking about  
the women who had accused you of sexual impropriety;  
correct?

A. Yeah.

Q. And you say, "These are lies being pushed  
by the media and the Clinton campaign"; correct?

A. Yeah. Not in all cases, but in some,  
yeah. I think that's what's happening with you and  
your client. I don't know if it's Clinton or if  
it's the Democrat party. It's probably not Clinton  
anymore.

Q. Let's watch --

A. But the Democrat party. That's you.

Q. I apologize.

Let's watch another video, tab 86.

(DJT Exhibit 40 was marked for  
identification.)

MS. KAPLAN: This is from the West Palm  
Beach event on October 13, 2016.

(Video played.)



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2 there was nothing -- I think the Anderson Cooper is  
3 very big. But I think in addition to that, there  
4 were no complaints. There was nothing lodged. Your  
5 client doesn't have any idea what time, when, what  
6 year, what decade, I guess. I don't know if they  
7 even know the decade. I think you have it boiled  
8 down to two or three years now.

9 No, it's -- I think it's a whole big  
10 scam. And I think you're doing this for the  
11 Democrat party, okay, your friends over in the  
12 Democrat party.

13 Q. I think we looked at this earlier. At  
14 the end of your statement, the first statement you  
15 made about E. Jean Carroll on June 21, which has  
16 been marked as DJT 20, you say, "If anyone has  
17 information that the Democratic party is working  
18 with Ms. Carroll or New York Magazine, please notify  
19 me as soon as possible."

20 Did anyone ever notify you --

21 A. Well, I'll let you know.

22 MS. HABBA: Objection.

23 MR. MADAIIO: Objection. That was already  
24 asked.

25 THE WITNESS: You'll hear. We'll let you

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A. I heard this case and I said this is one of the most ridiculous cases I've ever heard.

And I guess -- was that just before or just after the Anderson Cooper interview? But both ways, it was ridiculous when I heard it. After listening to the interview, it became even more ridiculous.

Q. Did you ask anyone at the Trump Organization to preserve any documents?

A. No.

Q. Did you ask anyone at your presidential campaign to preserve any documents?

A. No.

Q. Do you know if anyone did that on your behalf?

A. Nobody. I don't think anybody took this seriously.

When they heard this case, most people, without even seeing Anderson Cooper, thought it was a scam.

Q. In the other case, in which I deposed you last week, you testified when talking about documents that Norma Foerderer filed that you said, "We keep documents, yeah. We keep everything."