

# **EXHIBIT B**

1 SUPREME COURT OF THE STATE OF NEW YORK

2 COUNTY OF NEW YORK: CIVIL TERM PART: 37

3 -- -----X

4 PEOPLE OF THE STATE OF NEW YORK, BY  
5 LETITIA JAMES, ATTORNEY GENERAL OF THE  
STATE OF NEW YORK,

6 Plaintiff,

Index No.

7 -against-

452564/2022

8

9 DONALD J. TRUMP; DONALD TRUMP JR.;  
ERIC TRUMP; IVANKA TRUMP; ALLEN  
WEISSELBERG;JEFFREY McConney; THE  
10 DONALD J. TRUMP REVOCABLE TRUST; THE  
TRUMP ORGANIZATION, INC.; DJT HOLDINGS  
11 MANAGING MEMBER; TRUMP ENDEAVOR 12,  
LLC; 401 NORTH WABASH VENTURE, LLC  
12 TRUMP OLD POST OFFICE, LLC; 40 WALL  
STREET, LLC AND SEVEN SPRINGS, LLC,,

13

Defendants.

14 -----X

15 60 Centre Street  
16 New York, New York 10007  
January 11, 202

17 B E F O R E:

HON. ARTHUR F. ENGORON,, JSC.

18

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

20 FOR THE PLAINTIFFS:

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ALEX FINKELSTEIN, ESQ.

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A P P E A R A N C E S: (Cont.)

FOR THE DEFENDANTS:

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DINA M. LUDWICKI, RPR  
Senior Court Reporter

**-Closing Statement-**

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1 had done anything wrong. If that doesn't speak volumes, I  
2 don't know what does.

3 So with 15 seconds left, Your Honor, I would  
4 respectfully request that all the counts against my clients  
5 be dismissed and that there be no order of disgorgement  
6 against him.

7 Thank you.

8 THE COURT: So, Mr. Kise, not only is he an  
9 expert on the CPLR, but he can present a very enthusiastic  
10 argument.

11 MR. KISE: Again, they just put all the weight on  
12 my shoulders and then decided to travel on.

13 I would ask Your Honor, I think I would ask you  
14 reconsider, allow President Trump to address the Court for  
15 two or three minutes. The reason that I didn't feel that  
16 your restrictions were appropriate because, frankly, your  
17 restrictions stated in the email went beyond what was  
18 required under the law. They do have ambiguities. None of  
19 us today have commented on anything outside the appropriate  
20 bounds of closing argument. I don't believe President  
21 Trump will either. I think, under the circumstances you  
22 should hear from him.

23 All these people back here certainly want to hear  
24 from him, and I think as you say in your own email, you  
25 would benefit from hearing everything. There is no one

**-Closing Statement-**

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1 person more impacted by the decision you're going to make  
2 than President Trump here. So I would ask that the Court  
3 allow him to speak now briefly now and address the Court  
4 and present his views to you.

5 THE COURT: Well, this is not how it should have  
6 been done.

7 Mr. Trump, let me address you directly and  
8 Mr. Kise at the same time. If I let you speak for five  
9 minutes, I think that's what I will do, if you promise to  
10 just comment on the law and facts, application of one to  
11 the other and not go outside of that?

12 Mr. Kise, is that reasonable?

13 PRESIDENT TRUMP: Well, I think, your Honor, that  
14 this case goes outside of just the facts.

15 The facts are that the financial statements were  
16 perfect. That there was no witnesses against us. The  
17 banks got all their money paid back. They were great  
18 loans. The banks are happy as can be.

19 I mentioned the name Zurich, and Zurich, one of  
20 the most prestigious property and most prestigious  
21 insurance company in the world. They represent us right  
22 now. Supposed somebody said we defrauded them? I spoke to  
23 an executive at Zurich and they said: You didn't defraud  
24 us. If you defrauded us, we wouldn't be representing --  
25 they represent us right now. They weren't defrauded.

**-Closing Statement-**

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1           There wasn't one witness against us, and this  
2           does go outside of the bounds of what we're talking about.  
3           This is a political witch hunt that was set aside by --  
4           should be set aside. We should receive damages for what  
5           we've gone through, for what they've taken this company  
6           through. We have millions pages of documents and they  
7           don't have one document. They have nothing. They do have  
8           a triplex where they made a mistake and they corrected it  
9           immediately when it was made, and it was di-minimus,  
10          because the amount of the money they're talking about  
11          compared to the billions of dollars of net worth is  
12          irrelevant. It's virtually irrelevant. It's a very small  
13          number. It was a mistake that was corrected. That's the  
14          only thing I ever read in the papers, their triplex. They  
15          made a mistake, it was an honest mistake, some broker told  
16          them 30 because he took -- the floors are approximately  
17          10,000 feet, they heard, as you say, triplex, and they  
18          multiplied times three.

19                 Something like that can happen. When they found  
20                 it was the mistake, they immediately corrected it. I'm not  
21                 so sure that the dollar amount would have been so far off,  
22                 frankly, if you want to know, whatever the amount was. It  
23                 was around the 250 number. But it's a -- it's a very  
24                 small, it's a very small number.

25                 But when you say don't go outside of these

**-Closing Statement-**

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1 things, we have a situation where I'm an innocent man.

2 I've been persecuted by somebody running for office, and I  
3 think you have to go outside the bounds, because people,  
4 and you could read all the articles you want to read, but  
5 you look at the legal prognosticators, the legal scholars  
6 talking about this case, they find it disgraceful. The  
7 first time for a reason like this where there's -- you've  
8 ever used this statute. This statute is viscous. It  
9 doesn't give me a jury. It takes away all my rights. And  
10 it is, in fact, a statute used for consumer fraud. This is  
11 not consumer fraud. This is no fraud. This is a fraud on  
12 me.

13 What's happened here, sir, is a fraud on me. You  
14 know, other companies leave, they did it with Exxon. Exxon  
15 pays billions of dollars in taxes and they're now paying to  
16 Texas, and I went out and forced them that they want to  
17 make sure I'm never --

18 I just added up the other day the amount of taxes  
19 I've paid over the amount of the period that these people  
20 say, which, by the way, is absolutely limited by the  
21 Statute of Limitations. We won that case in the Court of  
22 Appeals. But I said how much tax have I paid over this?  
23 It's close the \$300 million in tax. They don't want me  
24 anymore. They don't want me here. I have done a lot of  
25 great things. I have built buildings all over the City.

**-Closing Statement-**

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1 I've never had a problem. All of a sudden I have a  
2 problem. I guess because I ran for office I have a problem  
3 because they want to make sure that I don't win again, that  
4 this is partially election interference. But, in  
5 particular, the person in the room right now hates Trump  
6 and uses Trump to get elected. And if I'm not allowed to  
7 talk about that, I think it really is a disservice because  
8 that is a very big part of this case. I would say that's  
9 100 percent.

10 Without all of that, Your Honor, with all of  
11 these days and months and years and millions and millions  
12 pages, big company, they found nothing. And now she comes  
13 in and says, we want to make a \$250 million fine, \$370  
14 million. For what? I borrowed money from the bank, much  
15 smaller than the number you are talking about, much smaller  
16 than 370. One of the reasons I borrowed money is the bank  
17 wanted me to. That's how they make money. The bank said  
18 you should actually have -- the head of Deutsche Bank came  
19 to see me -- I know this is boring for you.

20 THE COURT: One minute, Mr. Trump.

21 PRESIDENT TRUMP: You have your own agenda, I can  
22 certainly understand that. You can't listen for more than  
23 one minute. This has been a persecution of somebody that's  
24 done a good job in New York.

25 THE COURT: Mr. Kise, please control your client.

**-Closing Statement-**

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1                   By the way, you said you never had a problem;  
2 haven't you been sued before?

3                   PRESIDENT TRUMP: I have been sued. Sure, I've  
4 been sued.

5                   THE COURT: Isn't that a problem?

6                   PRESIDENT TRUMP: Most suits, but this is a suit  
7 that it seems I should have won many times. We've asked  
8 for directed verdict almost every time a witness took the  
9 stand. We've asked for a directed verdict and we were  
10 immediately shut down.

11                   Your Honor, look, I did nothing wrong. They  
12 should pay me for what we had to go through, what they have  
13 done to me reputationally and everything else. We have a  
14 great company. It's a successful company, a liquid  
15 company, like a lot of real estate companies are.

16                   We sell the best assets in the world, and she  
17 sued me to try to get publicity to run for office, and that  
18 includes running for governor, where she failed.

19                   THE COURT: It's 1:00 o'clock. Mr. Kise, we have  
20 to go anyway, the court officers are looking at me.

21                   Thank you, Mr. Trump.

22                   PRESIDENT TRUMP: Thank you.

23                   THE COURT: See you all at 2:15.

24                   Continued on next page.  
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