

EXHIBIT B

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

E. JEAN CARROLL,)
Plaintiff,)
)
-against-) 20-cv-7311 (LAK)
)
DONALD J. TRUMP, in his)
personal capacity,)
Defendant.)
_____)

CONFIDENTIAL
VIDEOTAPED DEPOSITION OF
E. JEAN CARROLL
New York, New York
Friday, October 14, 2022

Reported By:
CATHI IRISH, RPR, CRR, CLVS

1 CARROLL - CONFIDENTIAL

2 sold the company?

3 A. No.

4 Q. Did you ever use your own website
5 to meet anyone?

6 A. I looked.

7 Q. I'll just repeat my question.
8 Did you ever use the website to meet
9 anyone?

10 A. I didn't see anyone --

11 Q. You didn't --

12 A. -- that I would have dated.

13 Q. Did your sister ever date anybody
14 from the website?

15 A. No.

16 Q. What would have been your
17 criteria for someone you dated at that
18 time, and I can give you a year
19 approximately, but let's say when you sold
20 the company to The Knot?

21 A. Here's the thing, the light had
22 gone out. I just wasn't -- I liked
23 meeting men, I liked meeting new people
24 but my life was not there, you know? In
25 New York there's a taxi and if the light

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2 is on it means it's available, wants to
3 meet people. I didn't have that. My
4 light was gone.

5 Q. But you had been looking on the
6 website to see if there was anyone?

7 A. I'm always curious.

8 Q. Do you go out on dates?

9 MS. KAPLAN: Again, let's have a
10 time frame.

11 BY MS. HABBA:

12 Q. Same time frame, let's stick with
13 that time frame, when you sold it to The
14 Knot.

15 A. Every once in awhile but I rarely
16 let a new acquaintance get to the point
17 where he would ask me out or I would ask
18 him out.

19 Q. So you would go to dinners; is
20 that correct?

21 A. Yes, as friends.

22 Q. Let me ask you this: Did you
23 only date men?

24 A. Yes.

25 Q. Never dated women?

1 CARROLL - CONFIDENTIAL

2 A. No.

3 Q. So who was your last significant
4 relationship that you remember?

5 A. John Johnson.

6 Q. Who was the last man you dated
7 that you recall?

8 A. I don't remember his name.
9 That's how significant it was.

10 Q. Do you remember approximately
11 when?

12 A. No. It's not for lack of trying.
13 I wanted to meet people. I just -- the
14 music had stopped.

15 Q. Why do you think the music had
16 stopped?

17 A. Well, looking back on it, it may
18 have been what happened at Bergdorf's.

19 Q. Is there anything else that you
20 think could have caused it?

21 A. Luck, not -- not meeting people
22 that would make me want to spend time with
23 them.

24 Q. Do you consider yourself asexual
25 at this moment?

1 CARROLL - CONFIDENTIAL

2 A. No.

3 Q. So a sex drive is not the issue;
4 is that correct?

5 A. I had no desire for desire. I
6 don't have the desire to want sex. You
7 have to want sex.

8 Q. Would you describe that as a sex
9 drive for most people?

10 A. Yes.

11 Q. Have you ever tried to fix that
12 in any way, meaning getting help?

13 A. Well, looking back perhaps maybe
14 I should have but in my own way, I started
15 a dating site and then I started another
16 dating site. It's not that I was, you
17 know, staying in the house with a shawl
18 over my head.

19 Q. What type of men do you like?

20 MS. KAPLAN: Objection to form.

21 MS. HABBA: Generally what type
22 of men do you like?

23 MS. KAPLAN: You can answer.

24 THE WITNESS: Men who live
25 fascinating lives, men who are kind,

1 CARROLL - CONFIDENTIAL

2 men who have a great sense of humor,
3 men who are fun to be with, men who
4 love animals, men who love their
5 mothers, men who like women, men who
6 like other men, not sexually but like,
7 you know, athletic men, adventurous
8 men.

9 BY MS. HABBA:

10 Q. Do you like men who are
11 successful?

12 A. Yes.

13 MS. KAPLAN: Objection to form,
14 sorry.

15 THE WITNESS: Yes.

16 BY MS. HABBA:

17 Q. When is the last time you went
18 out with a man -- how do I state this --
19 in hopes of becoming more than friends?

20 A. See, that's the thing. You put
21 your finger on it. I've never met anybody
22 since that time where I felt that hope of
23 wow, I hope this turns into something.

24 Q. So when is last time you had sex?

25 A. '94 or '95.

1 CARROLL - CONFIDENTIAL

2 A. No.

3 Q. Do you recall what your
4 disposition was on that phone call?

5 A. I was in shock and disordered. I
6 felt unbalanced which was a strange
7 feeling for me.

8 Q. When you say unbalanced were you
9 actually physically unbalanced?

10 A. Yes.

11 Q. Did you sit down at any point
12 or --

13 A. No.

14 Q. Did you need to get a water or do
15 anything to take care of yourself after
16 that moment?

17 A. No, what I wanted to do, I needed
18 to talk to somebody, talk to Lisa. Then I
19 just wanted to go home.

20 Q. Is that what you did?

21 A. (Witness nodded.)

22 Q. So did you go to a parking garage
23 to get your car or did you go straight
24 home?

25 A. The parking garage.

1 CARROLL - CONFIDENTIAL

2 A. Model.

3 Q. Thank you.

4 A. It was a 1959. It was a real
5 beauty.

6 Q. What color?

7 A. That aquamarine and white. It
8 was a gorgeous car.

9 Q. So what did you do immediately
10 following the call?

11 A. Walked to the car.

12 Q. Did you call anybody else?

13 A. No.

14 Q. After you --

15 A. No, not particularly after that
16 call. I knew that I wasn't going to tell
17 anybody ever again about this. Lisa
18 shocked me in the call.

19 Q. Why did she shock you?

20 A. She told me I had been raped.

21 Q. Had it occurred to you?

22 A. No.

23 Q. After this conversation, did you
24 discuss this incident with Ms. Birnbach
25 again?

1 CARROLL - CONFIDENTIAL

2 Q. Have you ever questioned if what
3 happened in that dressing room was rape?

4 MS. KAPLAN: Objection to form.
5 You can answer.

6 THE WITNESS: I question whether
7 he thought it was rape. I never
8 questioned what I thought.

9 BY MS. HABBA:

10 Q. During the two decades that
11 followed, how would you say the alleged
12 attack impacted your life?

13 A. Well, four or five years ago I
14 would have told you it had no effect. I'm
15 as good as new. This is great. I'm fine.
16 I rarely think of it but I've come to
17 understand that that rape changed my life
18 which is shocking for me to now
19 understand.

20 Q. When you say four or five years
21 ago, do you mean when you started this
22 lawsuit?

23 A. No, before that, before that.
24 I'm talking about the time before this.

25 Q. Before the lawsuit.

1 CARROLL - CONFIDENTIAL

2 why was -- let me scratch that.

3 During the last two decades, have
4 you ever interacted with the defendant
5 again directly?

6 A. No.

7 Q. Were you aware that the
8 president -- that the defendant was a
9 presidential candidate prior to the 2016
10 election?

11 A. Yes.

12 Q. And are you aware that he ran in
13 2000 as a potential member of the reform
14 party?

15 A. No.

16 Q. Did you ever consider coming
17 forward with your account prior to #MeToo?

18 A. Never.

19 Q. Why not?

20 A. Just -- I'm going to say
21 something that even surprises me because
22 women who have been raped are looked at in
23 this society as less, are looked at as
24 spoiled goods, are looked at as rather
25 dumb to let themselves get attacked. I

1 CARROLL - CONFIDENTIAL

2 mean even you have to say did you scream?

3 I mean every woman who admits to being
4 attacked has to answer that question, why
5 didn't you scream, why did you come
6 forward when you did, why didn't you come
7 forward before and so no, I didn't -- I
8 would have been fired.

9 Q. How did you feel when you found
10 out that the defendant announced he was
11 running for president in 2016?

12 A. I thought oh, boy.

13 Q. What does oh, boy mean?

14 A. Just almost disbelief and a
15 little bit of heartache. I felt really
16 bad, you know.

17 Q. Why did you feel bad?

18 A. I didn't think he would be a good
19 candidate.

20 Q. Why didn't you come forward with
21 your account at that time?

22 A. I was with my mother in
23 Bloomington, Indiana. She was on her
24 deathbed. She was a feisty redheaded
25 Scottish woman, republican politician, so

1 CARROLL - CONFIDENTIAL

2 BY MS. HABBA:

3 Q. Were the timing of your
4 allegations related to the former
5 president's run for reelection?

6 A. No.

7 Q. Was it something you considered?

8 A. No.

9 Q. How did the defendant's
10 statements impact your personal life?

11 A. Totally affected it. I lost my
12 job. I'm looked at as a woman who's
13 untrustworthy, looked at now as a woman
14 who can't be believed. I'm looked at as a
15 woman who was stupid and dumb enough to
16 have happen to her what happened to her.

17 Q. You just said that you're looked
18 at as a woman stupid enough to have had
19 happen to her what happened to her; is
20 that correct?

21 A. (Witness nodded.)

22 Q. How does that relate to Donald
23 Trump, the perception rather?

24 A. He raped me and after that
25 everything I thought was quickly over and

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

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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 work out those problems for herself. Now, like
3 everyone else, she gets paid by a radical,
4 left-leaning publisher to say bad and untrue
5 things." Do you see that?

6 A. Yeah.

7 Q. I want to focus on the very last
8 sentence, which says: "Now, like everyone else, she
9 gets paid by a radical, left-leaning publisher to
10 say bad and untrue things."

11 A. Yeah.

12 Q. Do you know who her publisher was?

13 A. No. I just heard it was a publisher that
14 did some very bad books on us.

15 Q. I'll represent to you her publisher was
16 Harper Collins.

17 A. Yeah. And they haven't been great.

18 Q. Do you know who published your
19 son-in-law, Jared Kushner's book?

20 A. Could be, but they published some very
21 bad ones too.

22 Q. What is Truth Social?

23 A. It's a platform that's been opened by me
24 as an alternative to Twitter.

25 Q. And your handle on Truth Social is

1 D. J. TRUMP

2 @realdonaldtrump?

3 A. I believe so, yes.

4 Q. And as of today, you have approximately
5 four million followers on Truth Social?

6 A. I don't know the number. I know
7 Truth Social is doing very well. I think it was
8 number one ahead of TikTok, number one ahead of
9 Twitter, number one ahead of Instagram and everyone
10 else for the last number of days. I just noticed
11 that. Somebody put it on my desk. They have the
12 ratings, and they said Truth Social is hot.

13 Q. And I'll represent to you, sir, that we
14 looked it up, and it showed, at least as of the last
15 time we looked, you had around four million -- a
16 little bit over four million followers.

17 A. On me personally.

18 Q. On you personally.

19 A. Not Truth Social, on me. I don't know.
20 That's possible.

21 Q. Okay. And like Twitter, people have the
22 ability to repost, or I think as you used the
23 expression in Truth Social, "retruth" posts that you
24 make from your @realdonaldtrump account; correct?

25 A. I think so, yes. Yes, they do.

1 D. J. TRUMP

2 Q. And people have the opportunity to like
3 or heart one of your posts as well; correct?

4 A. Could be.

5 Q. Okay. Now, on October 12, just a few
6 days ago, you issued a statement on Truth Social
7 about Ms. Carroll and this case; correct?

8 A. I believe so, yes.

9 Q. And the statement that you posted, who
10 wrote that statement?

11 A. I did.

12 Q. You yourself?

13 A. Yeah.

14 Q. Did you post the statement yourself?

15 A. Yes.

16 Q. And in addition to posting the statement
17 on Truth Social, you also sent it to the press?

18 A. Yes. It's called truth and post. We
19 post much like -- how would you say it? We put out
20 a statement, and we also put it on Truth.

21 Q. And when you say you put it out --

22 A. Like a public relations statement.

23 Q. It goes, like, to an email list of
24 reporters?

25 A. Yeah, whatever. Yeah. The bigger grab

1 D. J. TRUMP

2 is The Truth, but we also -- we call it posts. We
3 have -- actually it's truth and post. So we call it
4 post. But the bigger -- the more important of the
5 two is The Truth because people are watching it.

6 Q. And in that sentence, you just used the
7 word "we." Does someone help you --

8 A. Well, I'm talking about me.

9 Q. Okay. But --

10 A. But when I say "we," I'm talking about
11 perhaps Truth because Truth has, you know, people
12 working for it, quite a few people.

13 Q. Okay. But you didn't personally send the
14 email to the reporters yourself, did you?

15 A. No. What they do is they take it from
16 Truth, and then they'll put it out as a press
17 release.

18 Q. And that's what I'm trying to ask, sir.
19 Who's "they"?

20 A. Different people that work in the
21 organization in Truth or -- some cases my office.

22 Q. And with this statement, do you recall
23 whether it was people who worked for Truth Social or
24 your office?

25 A. I believe we put it out through my

1 D. J. TRUMP

2 office.

3 Q. And who in your office would have been
4 responsible for doing that?

5 A. Possibly -- maybe Margo or maybe
6 Chamberlain, Chamberlain Harris.

7 Q. So Chamberlain Harris and -- I don't know
8 Margo's last name.

9 A. One or two of the people in the office
10 would have done it.

11 Q. What's Margo's last name?

12 A. Excuse me?

13 Q. Do you know Margo's last name?

14 A. Margo Martin.

15 Q. Trying to interpret the last several
16 questions and answers.

17 When you post something on Truth Social,
18 does it always go to the press ultimately, or does
19 someone make that decision?

20 A. Pretty automatic.

21 Q. Okay.

22 A. It goes to the press really directly on
23 Truth too. So most people have it before they get
24 the Post.

25 Q. And I take it when it goes to the

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 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. MADAIO: 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

1 D. J. TRUMP

2 on October 12, 2022, and a blown-up version because
3 we appreciate that the type is very small. A
4 blown-up version that should be more legible.

5 A. I can see it, yeah.

6 Q. Would you like me to read it into the
7 record?

8 A. Yeah, go ahead. Sure.

9 Q. So it says: "October 12, 2022, statement
10 by Donald J. Trump, forty-fifth President of the
11 United States of America. This 'Ms. Bergdorf
12 Goodman case' is a complete con job, and our legal
13 system in this country but especially in New York
14 State (just look at Peekaboo James) is a broken
15 disgrace. You have to fight for years and spend a
16 fortune in order to get your reputation back from
17 liars, cheaters, and hacks. This decision is from
18 the judge who was just overturned on my same case.
19 I don't know this woman, have no idea who she is
20 other than it seems she had a picture of me many
21 years ago with her husband shaking my hand on a
22 reception line at a celebrity charity event. She
23 completely made up a story that I met her at the
24 doors of this crowded New York City department store
25 and within minutes 'swooned' her." "Swooned" is in

1 D. J. TRUMP

2 quotes.

3 "It is a hoax and a lie just like all the
4 other hoaxes that have been played on me for the
5 past seven years, and while I'm not supposed to say
6 it, I will. This woman is not my type! She has no
7 idea what day, what week, what month, what year, or
8 what decade this so-called 'event' supposedly took
9 place. The reason she doesn't know is because it
10 never happened, and she doesn't want to get caught
11 up with details or facts that could be proven wrong.
12 If you watch Anderson Cooper's interview with her
13 where she was promoting a really crummy book, you
14 will see that it is a complete scam. She changed
15 her story from beginning to end after the commercial
16 break to suit the purposes of CNN and Andy Cooper.
17 Our justice system is broken along with almost
18 everything else in our country. Her lawyer is a
19 political operative and Cuomo crony who goes around
20 telling people that the way to beat Trump is to sue
21 him all over the place. She is suing me on numerous
22 frivolous cases just like this one, and the court
23 system does nothing to stop it.

24 "In the meantime and for the record,
25 E. Jean Carroll is not telling the truth, is a woman

1 D. J. TRUMP

2 I had nothing to do with, didn't know, and would
3 have no interest in knowing her if I ever had the
4 chance. Now all I have to do is go through years
5 more of legal nonsense in order to clear my name of
6 her and her lawyer's phony attacks on me. This can
7 only happen to 'Trump'!"

8 Did I read that correctly?

9 A. Great statement, yeah. True. True.

10 Q. And now that you've heard it again and
11 you have it in front of you, you again confirm that
12 you wrote the whole thing yourself?

13 A. I wrote it all myself. All myself.

14 Q. Did you talk to anyone before you wrote
15 it? Did you talk to anyone about what to say in the
16 statement?

17 A. No. I didn't need to. I'm not Joe
18 Biden.

19 Q. In this statement you say, I think, for
20 the first time that it was a charity event, that
21 photo. It was a charity event that --

22 A. That was what I was told, yeah. I was
23 told it was a charity event. Nobody knows which
24 event it was, but it was like a charity event.

25 Q. Do you know -- remember who told you

1 D. J. TRUMP

2 that?

3 A. No.

4 Q. Do you have any recollection --
5 withdrawn.

6 Did anyone tell you what charity it was
7 for?

8 A. I don't know exactly. I heard it was
9 like a celebrity charity event. It was a large
10 gathering of people but -- and I heard that was
11 actually a line, a celebrity line. But maybe that's
12 wrong.

13 Q. And if you turn -- well, you can look at
14 either page. There's a photo of Ms. Carroll beneath
15 your statement; correct?

16 A. Yes.

17 Q. How did you get that photo?

18 A. It was in one of the newspapers. They
19 just took it from the paper. I think it was in one
20 of the newspapers.

21 Q. So you just copied and pasted it
22 yourself?

23 A. Yeah. I didn't paste it, no, but
24 somebody cut it out. They gave me a picture. This
25 was the picture she gave. I think it's okay.

1 D. J. TRUMP

2 Q. So you wrote the statement and someone in
3 your office gave you the picture?

4 A. They pasted it. They -- it's called
5 pasting. You put it onto a statement. This was a
6 Save America statement, which is very interesting
7 actually because it is saving America, stopping
8 people from doing things like this, trying to
9 save -- it's one big part of saving America. No.
10 But this was the photo that was given of her.

11 Q. Okay. Who gave you the photo?

12 A. I don't know. I don't know.

13 Q. Was it someone in your office?

14 A. I think it's stock. I think it's a stock
15 photo. It was taken from either a periodical or a
16 newspaper.

17 Q. Why did you include -- decide to include
18 this photo in your post?

19 A. I don't know. They just gave me a photo.
20 I don't know. They just added it in.

21 Q. So you weren't given a selection of
22 photos to --

23 A. No. No. They just added it in.

24 Q. Now, at the beginning of your post, the
25 reference "Ms. Bergdorf Goodman" is a reference to

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 nothing about her. I think she's sick, mentally
3 sick.

4 Q. Okay. You say in this post -- you use a
5 strange word, which I want to ask you about. You
6 say she completely made up a story that I met her at
7 the doors of this crowded New York City department
8 store and within minutes swooned her. Do you see
9 that?

10 A. Yeah.

11 Q. What does "swooned her" mean?

12 A. That would be a word, maybe accurate or
13 not, having do with talking to her and talking
14 her -- to do an act that she said happened, which
15 didn't happen. And it's a nicer word than the word
16 that starts with an F, and this would be a word that
17 I used because I thought it would be inappropriate
18 to use the other word. And it didn't happen.

19 Q. Okay. I was curious when I read this.
20 So I looked up the word "swoon" in the dictionary,
21 and under the dictionary, it means "to faint with
22 extreme emotion." That's not what you meant here?

23 MS. HABBA: Objection to the form.

24 THE WITNESS: Well, sort of that's what
25 she said I did to her. She fainted with great

1 D. J. TRUMP

2 emotion. She actually indicated that she loved
3 it. Okay? She loved it until commercial
4 break. In fact, I think she said it was sexy,
5 didn't she? She said it was very sexy to be
6 raped. Didn't she say that?

7 BY MS. KAPLAN:

8 Q. So, sir, I just want to confirm: It's
9 your testimony that E. Jean Carroll said that she
10 loved being sexually assaulted by you?

11 A. Well, based on her interview with
12 Anderson Cooper, I believe that's what took place.
13 And we can define that. You'll have to show that.
14 I'm sure you're going to show that. But she was
15 interviewed by Anderson Cooper, and I think she said
16 that rape was sexy -- which it's not, by the way.
17 But I think she said that rape was sexy, and it
18 was -- she actually said things that were very
19 strange, and then she was a different person after
20 the -- when he said "We'll take a break right now.
21 We're going to take a break right now," he didn't
22 like what she was saying. He was very upset with
23 what -- and then she came back, and she was a much
24 different woman in the second half, so to speak.

25 Q. So, again, just so the testimony is

1 D. J. TRUMP

2 clear, because you tend to give long answers. Is it
3 your testimony, sir, that on Anderson Cooper she --
4 I just lost it. She indicated on the
5 Anderson -- "she" being E. Jean Carroll -- indicated
6 on the Anderson Cooper show that she loved it?

7 A. If you see the front part of her
8 interview, the first part of her interview, before
9 Anderson -- in a panic because she wasn't saying the
10 right thing for him and for CNN -- it was very
11 hostile. In a panic he said we're going to station
12 break. I think he said it twice. He wanted her to
13 stop. He wanted her to stop talking. If you watch
14 that interview -- yeah. She said a lot of things in
15 that interview, things that make her into a total
16 liar.

17 Q. And so the question I'm asking you is did
18 she say in that interview that she loved being
19 sexually assaulted by you?

20 A. Well, she said something to that effect.
21 I mean, you'll have to take a look at the interview
22 yourself. I believe she said rape was sexy, to
23 which Anderson Cooper is dying. He's saying let's
24 get to a commercial break immediately. I think you
25 better watch the interview. I'm sure you have, but

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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

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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

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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 you talk about the justice system being broken;
3 correct?

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

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

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

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

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

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2 but he was overturned, I understand. And it's the
3 same judge. As I understand it, he was overturned,
4 and it's the same judge.

5 Q. Yeah, you reference that in the
6 statement; correct?

7 A. Yeah. That's what I hear. My lawyers
8 tell me that. Maybe it's right; maybe not.

9 Q. Is it your understanding that as a result
10 of the denial of the motion for stay that this
11 deposition that you've been complaining about a lot
12 was going to happen; correct?

13 MS. HABBA: Objection.

14 MR. MADAIIO: Objection.

15 THE WITNESS: I really don't know what it
16 represented actually. I just know that we had
17 something which was a loss and -- but I don't
18 think that had anything to do with the
19 statement itself much.

20 THE VIDEOGRAPHER: Off the record at
21 1:55.

22 (A brief recess was taken.)

23 THE VIDEOGRAPHER: On the record at 2:20
24 p.m.

25

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2 BY MS. KAPLAN:

3 Q. So just before the break, we were talking
4 about the decision by the judge in this case to deny
5 the motion to stay discovery, and I think you
6 testified -- gave some testimony about your general
7 view -- correct me if I'm wrong -- is that this case
8 is a waste of time and ridiculous. I think you just
9 said that even off the record.

10 Sir, are you aware that in a letter to
11 Judge Kaplan back in May, the parties said to him
12 that it was your side -- it was defendant
13 proposed -- who proposed that the parties resume
14 discovery in this case back in May?

15 A. I don't know what my lawyers have done.

16 Q. Now, in your Truth Social statement on
17 October 12, you use the word "hoax." Specifically
18 you say: "It is a hoax and a lie just like all of
19 the other hoaxes that have been played on me for the
20 past seven years." Do you see that --

21 A. Yeah.

22 Q. -- or recall making that statement?

23 And I take it what you're saying there is
24 Ms. Carroll fabricated her claim that you sexually
25 assaulted her; correct?

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2 A. Yes. Totally. 100 percent.

3 Q. Fair to say -- you'd agree with me, would
4 you not, that you use the term "hoax" quite a lot?

5 A. Yes, I do.

6 Q. CNN reported that you used it more than
7 250 times in 2020. Does that sound right?

8 A. Could be. I've had a lot of hoaxes
9 played on me. This is one of them.

10 Q. And how would you define the word "hoax"?

11 A. A fake story, a false story, a made-up
12 story.

13 Q. Something that's not true?

14 A. Something that's not true, yes.

15 Q. Sitting here today, can you recall what
16 else you have referred to as a hoax?

17 A. Sure.

18 MR. MADAIIO: Object to the form.

19 You can answer.

20 THE WITNESS: The Russia Russia Russia
21 hoax. It's been proven to be a hoax. Ukraine
22 Ukraine Ukraine hoax. The Mueller situation
23 for two and a half years hoax ended in no
24 collusion. It was a whole big hoax. The lying
25 to the FISA court hoax, the lying to Congress

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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 voted by mail?

3 MS. HABBA: Objection.

4 THE WITNESS: I do. I do. Sometimes I
5 do. But I don't know what happens to it once
6 you give it. I have no idea.

7 BY MS. KAPLAN:

8 Q. Do you remember there was a story
9 published in the Atlantic in September 2020 that
10 reported that you had disparaged Americans who had
11 died in war?

12 A. That was a hoax.

13 Q. That story was a hoax too?

14 A. Oh, that's a hoax. That was one of the
15 worst of all. That was a total hoax.

16 Q. And so are you -- is it your testimony
17 today that you did not say why should I go to that
18 cemetery? It's filled with losers?

19 MS. HABBA: Objection.

20 THE WITNESS: Not only did I not say
21 that, I had people that said I didn't say it.
22 It was a made-up hoax by a failed magazine.

23 BY MS. KAPLAN:

24 Q. And that's the Atlantic?

25 A. I don't know. Whichever one. I think it

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2 was the Atlantic.

3 Q. And isn't it true, sir, that you also
4 have referred to global warning as a hoax?

5 A. Yeah. I think it's largely a hoax, yes.

6 Q. When you say "largely a hoax," what do
7 you mean?

8 A. Well, I think the whole environmental
9 thing is destroying our country in so many different
10 ways. I think they've weaponized the environment,
11 yeah. A lot of what they do is a hoax, yes.
12 Absolutely.

13 Q. Okay. But just so the record is clear,
14 do you think the scientific consensus that the
15 temperatures on planet Earth have been getting
16 warmer and are continuing to get warmer is a hoax?

17 MR. MADAIIO: Objection.

18 THE WITNESS: I think they go both ways,
19 but I think it has nothing do with this case.
20 I mean, why are you asking -- other than you're
21 a political person, why are you asking this
22 question? What does that have to do with this
23 case?

24 BY MS. KAPLAN:

25 Q. Sir, again, I get to --

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2 A. Yeah, I know. I know --

3 Q. -- ask the question --

4 A. But I don't think you should be allowed
5 to ask that question. That has nothing to do with
6 this case.

7 Q. Isn't it true --

8 MS. KAPLAN: Let's mark these as the
9 next.

10 THE WITNESS: How long do you take
11 between questions. Is that done on purpose?
12 Yes. You shouldn't let this happen.

13 MS. HABBA: We put objections on the
14 record.

15 BY MS. KAPLAN:

16 Q. I don't need to answer this, but it is
17 important. I'm sure your attorney will tell you
18 that the record be clean, and we're making sure that
19 the documents and the questions --

20 A. Oh, oh.

21 Q. -- produce a clean record.

22 MS. KAPLAN: And we're doing -- this one
23 is 30?

24 (DJT Exhibit 29 was marked for
25 identification.)

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2 (DJT Exhibit 30 was marked for
3 identification.)

4 BY MS. KAPLAN:

5 Q. I'm going to hand you two documents. 29
6 is a tweet that you posted on Twitter on December 6,
7 2013?

8 A. I don't know when it was posted.
9 Whatever it says is okay with me.

10 Q. And you said that -- in that tweet you
11 say: "The expensive hoax that is global warming"?

12 A. Yeah. They've weaponized the
13 environment, much to the destruction of our country.

14 Q. And if you look at DJT 30, a little bit
15 later that month, you said something similar, which
16 is: "We should be focused on a clean" -- let me get
17 it right. Withdrawn.

18 "We should be focused on clean and
19 beautiful air - not expensive and business
20 closing" -- all caps -- "global warming - a total
21 hoax!"

22 A. Yeah. They don't call it global warming
23 anymore. You know why? Because it wasn't working.
24 Now it's called climate change.

25 Q. Now, the same night that you posted on

1 D. J. TRUMP

2 Truth Social the posts that's been marked as DJT 28,
3 you also posted a video; correct?

4 A. I don't know. Maybe. I hope.

5 MS. KAPLAN: So let's mark as the next
6 tab a video. We'll mark it as DJT 31, which is
7 a video from Truth Social posted by
8 @realdonaldtrump on October 12, 2022.

9 (DJT Exhibit 31 was marked for
10 identification.)

11 MS. KAPLAN: And I'm going to -- again, I
12 apologize. I'm going to get up and look at it
13 because of the technological problems we've
14 been having.

15 (Video played.)

16 MR. MADAIIO: Just wanted to put on the
17 record that the first about ten seconds or so
18 was very choppy on our end here. It was very
19 difficult to see.

20 BY MS. KAPLAN:

21 Q. So it's my understanding that there's
22 some choppiness from probably the rain outside and
23 the Internet connection. There's also some
24 choppiness that's deliberately in the video, and we
25 will give the court reporter the video. But there

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2 is some deliberate pausing in that where it looks
3 like there's colors and bar graphs. That's
4 deliberately on the video. That's not coming --

5 MR. MADAIO: No. I think just about the
6 first ten seconds or so it was skipping.

7 MS. HABBA: We don't need to see it
8 again.

9 THE WITNESS: Okay. Go ahead.

10 BY MS. KAPLAN:

11 Q. So you don't deny that you posted that
12 video on Truth Social, sir?

13 A. No, not at all.

14 Q. And whose idea was it to --

15 A. Mine.

16 Q. -- create that video? Yours?

17 Who was the involved in the creation of
18 that video?

19 MR. MADAIO: Objection.

20 You can answer.

21 THE WITNESS: Done in house.

22 MS. KAPLAN: What's your objection, sir?

23 MR. MADAIO: It's an objection based on
24 relevance.

25 MS. KAPLAN: There's no relevance

1 D. J. TRUMP

2 objections at depositions.

3 MR. MADAIIO: Well, to the form of the
4 question.

5 BY MS. KAPLAN:

6 Q. Who was involved in creating that video?

7 A. Well, it wasn't much of a creation. We
8 took most of it right off of that stupid Anderson
9 Cooper's bad ratings show.

10 Q. When you say "we" --

11 A. "We," yeah. The group that did it.
12 Whoever did it. I could get you a name of somebody
13 that actually did it if you'd like. Would you like
14 that?

15 Q. Well, sitting here today --

16 A. I don't know.

17 Q. You don't remember --

18 A. No, I have no idea. I mean, we have
19 people that do that. I could find out who did it.

20 Q. We would request that information --

21 A. Oh, sure.

22 Q. Who instructed that it be done?

23 A. Me.

24 Q. Okay. And you have someone working for
25 you that it could be done?

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2 A. Yeah. Sure.

3 Q. Okay. What entity did that person work
4 for?

5 A. I have to check that out.

6 Q. Okay. I take it from your prior
7 testimony that you yourself aren't capable of
8 creating a video like that?

9 A. No, I don't do that. I would like to,
10 but I don't do that.

11 Q. And do you know, sitting here today, who
12 came up with the text that appeared on the screen in
13 that video?

14 A. I really don't know.

15 Q. And do you know who made the cuts that
16 are shown from the Anderson Cooper interview?

17 A. No, I don't. We could play the whole
18 thing, but I guess they were trying to save time
19 because, you know, the interview takes five, ten
20 minutes. So I guess they're trying to save time.
21 So you have to do some cuts. Otherwise you can't do
22 a five-minute commercial.

23 Q. So is it your testimony, sir, that the
24 only reason those cuts were made the way they were
25 is to save time?

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2 A. Well, one of the things. I like people
3 to watch the whole interview. Actually I felt the
4 whole interview was much better than that
5 commercial, than that piece we did. But you can't
6 fit the whole interview because it was, I think,
7 seven minutes or something like that, and there's
8 never been a seven-minute commercial. So it's very
9 standard to do that.

10 Q. Before that video was posted on
11 Truth Social, did you approve it as it was -- did
12 you approve it?

13 A. Yeah, I approved it.

14 Q. Okay. And --

15 A. And I would like the whole show better,
16 but you can't do the whole show because it's too
17 long. So they take snippets, which is very
18 standard.

19 Q. And again, your understanding is the only
20 reason they take the snippets they do is because --
21 to cut it down for length?

22 A. Well, you can't -- I mean, I'd much
23 rather have the whole show. In court, if we ever go
24 there -- because this case is a disgrace that should
25 be not even allowed to happen.

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2 But in court, they'll watch the whole
3 show. They're not going to watch snippets.

4 Q. Have you ever kissed a woman without her
5 consent?

6 A. Well, I don't -- I can't think of any
7 complaints. But no. I mean, I don't think so.

8 I think it's an inappropriate question,
9 but I don't think so.

10 Q. Have you ever touched a woman on her
11 breast or her buttocks or any other sexual part
12 without her consent?

13 MS. HABBA: Objection to form.

14 THE WITNESS: Well, I will tell you no,
15 but you may have some people like your client
16 that lie.

17 BY MS. KAPLAN:

18 Q. Have you ever pressured a woman to engage
19 in sex with you?

20 A. The answer is no. But you may have some
21 people like your client who are willing to lie.

22 Q. Do you know what "sexual harassment"
23 means?

24 A. Yeah, pretty much.

25 Q. Does it accord with your understanding