

SUPREME COURT OF NEW YORK
COUNTY OF NEW YORK

PEOPLE OF THE STATE OF NEW YORK,
by LETITIA JAMES, Attorney General of the
State of New York,

Petitioner,

-against-

THE TRUMP ORGANIZATION, INC.; DJT
HOLDINGS LLC; DJT HOLDINGS
MANAGING MEMBER LLC; SEVEN
SPRINGS LLC; ERIC TRUMP; CHARLES
MARTABANO; MORGAN, LEWIS &
BOCKIUS, LLP; SHERI DILLON;
DONALD J. TRUMP; IVANKA TRUMP;
and DONALD TRUMP, JR.,

Respondents.

Index No.: 451685/2020

**ANSWER TO VERIFIED
SUPPLEMENTAL PETITION**

Respondent, Donald J. Trump (“Respondent” or “Mr. Trump”), by and through his attorneys, Habba Madaio & Associates LLP, as and for his Answer to the Verified Supplemental Petition dated January 18, 2022 (the “Supplemental Petition”) filed by Petitioner, the People of the State of New York by Letitia James Attorney General of the State of New York (“Petitioner”), answers as follows:

RESERVATION OF RIGHTS

Respondent objects to the Supplemental Petition to the extent that it is procedurally improper or otherwise fails to comport with the requirements of the CPLR and/or other applicable laws. In addition, to the fullest extent permitted by law, Respondent reserves the right to supplement, amend, revise, clarify and/or modify his responses, which are made based upon present knowledge, understanding and belief, and to assert additional defenses and objections.

PRELIMINARY STATEMENT

1. Denies knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 1 of the Supplemental Petition.

2. Denies knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 2 of the Supplemental Petition.

3. Denies knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 3 of the Supplemental Petition.

4. Admits that the Office of the Attorney General (“OAG”) has subpoenaed documents and testimony from Mr. Trump, and respectfully refers to the Court to said subpoenas for the true, accurate, and contextual scope thereof. Denies the remainder of the allegations contained in paragraph 4 of the Supplemental Petition.

5. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 5 of the Supplemental Petition, except admits that the OAG has been conducting an investigation.

6. Neither admits nor denies the legal conclusions contained in paragraph 6 of the Supplemental Petition and respectfully refers all questions of law to the Court for a determination thereof.

7. Neither admits nor denies the legal conclusions contained in paragraph 6 of the Supplemental Petition and respectfully refers all questions of law to the Court for a determination thereof.

8. Neither admits nor denies any of the legal conclusions contained in paragraph 8 of the Supplemental Petition and respectfully refers all questions of law to the Court for a determination thereof. Denies knowledge or information sufficient to form a belief as to the truth of the remaining allegations set forth in paragraph 8 of the Supplemental Petition.

9. Denies the allegations contained in paragraph 9 of the Supplemental Petition, except admits that Mr. Trump, Jr. is or has been involved in the management of the Trump Organization; that he is or has been a trustee of the Donald Trump Revocable Trust; and has been involved in the issuance of certain financial statements regarding the assets of the Trust.

10. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 10 of the Supplemental Petition, except admits that Ms. Ivanka Trump was an executive of the Organization.

11. Denies knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 11 of the Supplemental Petition, and respectfully refers all questions of law to the Court for a determination of.

THE PARTIES

12. Denies knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 12 of the Supplemental Petition.

13. Denies knowledge or information sufficient to form a belief as to the allegations contained in paragraph 13 of the Supplemental Petition, except admits that Mr. Trump has been an executive of the Trump Organization and has had an interest in the Trump Organization.

14. Denies knowledge or information sufficient to form a belief as to the allegations contained in paragraph 14 of the Supplemental Petition, except admits that Mr. Trump, Jr. is an Executive Vice President of the Trump Organization; that he and Mr. Eric Trump had management responsibilities of the Trump Org in 2017; and that Mr. Trump, Jr. had oversight over certain aspects of the company's property development.

15. Admits only that Mazars USA LLP ("Mazars") compiled the Statements for a time and that Whitley Penn LLP compiled at least one Statement, and otherwise denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 26

of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof

JURISDICTION, APPLICABLE LAW, AND VENUE

16. Neither admits nor denies the legal conclusions contained in paragraph 16 of the Supplemental Petition and respectfully refers all questions of law to the Court for a determination thereof.

17. Neither admits nor denies the legal conclusions contained in paragraph 17 of the Supplemental Petition and respectfully refers all questions of law to the Court for a determination thereof.

18. Neither admits nor denies the legal conclusions contained in paragraph 18 of the Supplemental Petition and respectfully refers all questions of law to the Court for a determination thereof.

19. Neither admits nor denies the legal conclusions contained in paragraph 19 of the Supplemental Petition and respectfully refers all questions of law to the Court for a determination thereof.

20. Neither admits nor denies the legal conclusions contained in paragraph 20 of the Supplemental Petition and respectfully refers all questions of law to the Court for a determination thereof.

21. Neither admits nor denies the legal conclusions contained in paragraph 21 of the Supplemental Petition and respectfully refers all questions of law to the Court for a determination thereof.

22. Neither admits nor denies the legal conclusions contained in paragraph 22 of the Supplemental Petition and respectfully refers all questions of law to the Court for a determination thereof.

23. Neither admits nor denies the legal conclusions contained in paragraph 23 of the Supplemental Petition and respectfully refers all questions of law to the Court for a determination thereof.

24. Neither admits nor denies the legal conclusions contained in paragraph 24 of the Supplemental Petition and respectfully refers all questions of law to the Court for a determination thereof.

PRELIMINARY FACTUAL FINDINGS

25. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 25 of the Supplemental Petition, except admits the existence of an annual “Statement of Financial Condition of Donald J. Trump.” To the extent that the allegations in Paragraph 25 of the Supplemental Petition purport to characterize the Statements or their creation, Respondent denies such allegations.

26. Admits only that Mazars compiled the Statements for a time and that Whitley Penn LLP compiled at least one Statement, and otherwise denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 26 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

27. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 27 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

28. Admits only that the Statements were provided to various counterparties, and otherwise denies the allegations contained in paragraph 28 of the Supplemental Petition to the extent that they seek a legal conclusion, and respectfully refers the Court to the specific documents between the parties for the true, accurate and contextual understanding thereof.

29. Neither admits nor denies the legal conclusions contained in paragraph 29 of the Supplemental Petition and respectfully refers all questions of law to the Court for a determination thereof. Denies knowledge or information sufficient to form a belief as to the truth of the remaining allegations set forth in paragraph 29 of the Supplemental Petition.

30. Neither admits nor denies the legal conclusions contained in paragraph 30 of the Supplemental Petition and respectfully refers all questions of law to the Court for a determination thereof. Denies knowledge or information sufficient to form a belief as to the truth of the remaining allegations set forth in paragraph 30 of the Supplemental Petition.

31. Denies knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 31 of the Supplemental Petition.

32. Admits only that the Seven Springs Estate (“Seven Springs”) is a parcel of real property that consists of approximately 212 acres within the towns of Bedford, New Castle, and North Castle in Westchester County, and otherwise denies knowledge or information sufficient to form a belief as to the allegations contained in paragraph 32 of the Supplemental Petition and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

33. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 33 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

34. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 34 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

35. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 35 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

36. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 36 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

37. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 37 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

38. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 38 of the Supplemental Petition, and respectfully refers the Court to the cited documents, including the transcript of Mr. McCardle's testimony, for the true, accurate, and contextual meaning thereof.

39. Denies knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 39 of the Supplemental Petition.

40. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 40 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

41. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 41 of the Supplemental Petition, respectfully refers the Court to the cited documents, including the transcript of Mr. McCardle's testimony, for the true, accurate, and contextual meaning thereof.

42. Denies knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 42 of the Supplemental Petition.

43. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 43 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

44. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 44 of the Supplemental Petition, and respectfully refers the Court to the cited documents, including the transcript of Mr. McCardle's testimony, for the true, accurate, and contextual meaning thereof.

45. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 45 of the Supplemental Petition, and respectfully refers the Court to the cited documents, including the transcript of Mr. McCardle's testimony, for the true, accurate, and contextual meaning thereof.

46. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 46 of the Supplemental Petition, and respectfully refers the Court to the cited documents, including the transcript of Mr. McCardle's testimony, for the true, accurate, and contextual meaning thereof.

47. Denies the allegations contained in paragraph 47 of the Supplemental Petition.

48. Neither admits nor denies the legal conclusions contained in paragraph 48 of the Supplemental Petition and respectfully refers all questions of law to the Court for a determination thereof. To the extent a response is required, Mr. Trump denies knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 48 of the

Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

49. Denies the allegations contained in paragraph 49 of the Supplemental Petition.

50. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 50 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

51. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 51 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

52. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 52 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

53. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 53 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

54. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 54 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

55. Denies the allegations contained in paragraph 55 of the Supplemental Petition.

56. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 56 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

57. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 57 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

58. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 58 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

59. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 59 of the Supplemental Petition, and respectfully refers the Court to the cited documents, including the transcript of Mr. Weisselberg's examination, for the true, accurate, and contextual meaning thereof.

60. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 60 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

61. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 61 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

62. Admits only that Trump International Golf Club Scotland ("Trump Aberdeen") is a parcel of land containing a golf course, a country club, and undeveloped land in Aberdeen, Scotland, and otherwise denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 62 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

63. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 63 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

64. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 64 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

65. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 65 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

66. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 66 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

67. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 67 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

68. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 68 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

69. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 69, and respectfully refers the Court to the cited sources, including Mr. Trump's testimony before the Scottish Government, for the true, accurate, and contextual meaning thereof.

70. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 70 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

71. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 71 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

72. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 72 of the Supplemental Petition, and respectfully refers the Court to cited documents, including the full transcript of Mr. Weisselberg's examination, for the true, accurate, and contextual meaning of his testimony.

73. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 73 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

74. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 74 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

75. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 75 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

76. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 76 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

77. Denies knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 77 of the Supplemental Petition.

78. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 78 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

79. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 79 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

80. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 80 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

81. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 81 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

82. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 82 of the Supplemental Petition.

83. Neither admits nor denies the legal conclusions contained in paragraph 83 of the Supplemental Petition and respectfully refers all questions of law to the Court for a determination thereof. Denies knowledge or information sufficient to form a belief as to the truth of the remaining allegations set forth in paragraph 83 of the Supplemental Petition.

84. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 84, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

85. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 85, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

86. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 86, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

87. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 87, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

88. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 88, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

89. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 89, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

90. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 90, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

91. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 91, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

92. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 92, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

93. Admit that certain loans were guaranteed and denies knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 93, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

94. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 94, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

95. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 95, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

96. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 96, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

97. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 97, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

98. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 98, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

99. Denies that Mr. Trump personally purchased the property and denies knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 99, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

100. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 100, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

101. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 101, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

102. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 102, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

103. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 103, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

104. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 104, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

105. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 105, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

106. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 106, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

107. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 107, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

108. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 108, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

109. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 109, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

110. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 110, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

111. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 111, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

112. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 112, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

113. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 113, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

114. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 114, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

115. Denies the allegations contained in paragraph 115 of the Supplemental Petition.

116. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 116, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

117. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 117, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

118. Denies the allegations contained in paragraph 118 of the Supplemental Petition.

119. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 119, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

120. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 120, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

121. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 121, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

122. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 122, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

123. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 123, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

124. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 124, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

125. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 125, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

126. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 126, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

127. Denies knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 127 of the Supplemental Petition.

128. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 128, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

129. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 129 of the Supplemental Petition, and respectfully refers the

Court to the cited sources, including Mr. McConney's testimony, for the true, accurate, and contextual meaning thereof.

130. Denies knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 130 of the Supplemental Petition.

131. Admits only that Ms. Ivanka Trump resided in the Trump Park Avenue building, and otherwise denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 131 of the Supplemental Petition.

132. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 132, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

133. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 133, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

134. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 134, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

135. Neither admits nor denies the allegations contained in paragraph 135, and respectfully refers the Court to the cited sources for the true, accurate, and contextual meaning thereof.

136. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 136 of the Supplemental Petition.

137. Admits the allegations contained in paragraph 137 of the Supplemental Petition.

138. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 138, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

139. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 139, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

140. Denies the allegations contained in paragraph 140 of the Supplemental Petition.

141. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 141, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

142. Admits only that 40 Wall Street is an office building located on Wall Street in New York and that Mr. Trump has an interest, and otherwise denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 142 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

143. Denies knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 143 of the Supplemental Petition.

144. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 144, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

145. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 145, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

146. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 146, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

147. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 147, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

148. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 148, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

149. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 149, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

150. Admits the allegations contained in paragraph 150 of the Supplemental Petition.

151. Denies knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 151 of the Supplemental Petition.

152. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 152, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

153. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 153, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

154. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 154, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

155. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 155, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

156. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 156, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

157. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 157, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

158. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 158, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

159. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 159, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

160. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 160 of the Supplemental Petition.

161. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 161 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

162. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 162 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

163. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 163 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

164. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 164 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

165. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 165 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

166. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 166 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

167. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 167 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

168. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 168 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

169. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 169 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

170. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 170 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

171. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 171 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

172. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 172 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

173. Admit that Deutsche Bank issued a loan and deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 173 of the Supplemental Petition, and respectfully refers the Court to the cited documents, including the personal guarantee, for the true, accurate, and contextual meaning thereof.

174. Denies knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 174 of the Supplemental Petition.

175. Admit that certain loans contained guarantees and deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 175 of the Supplemental Petition, and respectfully refers the Court to the cited documents, including the personal guarantee, for the true, accurate, and contextual meaning thereof.

176. The allegations contained in paragraph 176 reference documents which speak for themselves. To the extent a response is required, Mr. Trump denies knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 176 of the Supplemental Petition.

177. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 177 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof, except admits that Mr. Trump, Jr. would sign certain documents.

178. Denies knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 178 of the Supplemental Petition.

179. Denies knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 179 of the Supplemental Petition.

180. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 180 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

181. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 181 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

182. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 182 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

183. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 183 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

184. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 184 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

185. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 185 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

186. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 186 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

187. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 187 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

188. Denies knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 188 of the Supplemental Petition.

189. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 189 of the Supplemental Petition.

190. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 190 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

191. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 191 of the Supplemental Petition, except admits that an entity donated a conservation easement over land used as a driving range on the Trump National Golf Course – Los Angeles (“Trump Golf LA”) property.

192. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 192 of the Supplemental Petition.

193. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 193 of the Supplemental Petition except that the property was purchased in 2002 and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

194. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 194 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

195. Denies knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 195 of the Supplemental Petition.

196. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 196 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

197. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 197 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

198. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 198 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

199. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 199 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

200. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 200 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

201. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 201 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

202. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 202 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

203. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 203 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

204. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 204 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

205. Denies the allegations set forth in paragraph 205 of the Supplemental Petition.

206. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 206 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

207. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 207 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

208. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 208 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

209. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 209 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

210. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 210 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

211. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 211 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

212. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 212 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

213. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 213 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

214. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 214 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

215. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 215 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

216. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 216 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

217. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 217 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

218. Denies knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 218 of the Supplemental Petition.

219. Denies knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 219 of the Supplemental Petition.

220. Neither admits nor denies the conclusions of law contained in paragraph 220 of the Supplemental Petition, and respectfully refers all questions of law to the Court for a determination thereof.

221. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 221 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

222. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 222 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

223. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 223 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

224. Denies knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 224 of the Supplemental Petition.

225. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 225 of the Supplemental Petition.

226. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 226 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

227. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 227 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

228. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 228 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

229. The Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 229 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

230. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 230 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

231. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 231 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

232. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 232 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

233. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 233 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

234. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 234 of the Supplemental Petition, except that the property was purchased in 1995 for approximately \$7.5 million and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

235. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 235 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

236. Denies knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 236 of the Supplemental Petition.

237. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 237 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

238. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 238 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

239. Denies knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 239 of the Supplemental Petition.

240. Denies knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 240 of the Supplemental Petition.

241. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 241 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

242. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 242 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

243. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 243 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

244. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 244 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

245. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 245 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

246. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 246 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

247. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 247 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

248. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 248 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

249. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 249 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

250. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 250 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

251. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 251 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

252. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 252 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

253. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 253 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

254. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 254 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

255. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 255 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

256. Denies knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 256 of the Supplemental Petition.

257. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 257 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

258. Denies knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 258 of the Supplemental Petition.

259. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 259 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

260. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 260 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

261. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 261 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

262. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 262 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

263. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 263 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

264. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 264 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

265. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 265 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

266. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 266 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

267. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 267 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

268. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 268 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

269. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 269 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

270. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 270 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

271. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 271 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

272. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 272 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

273. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 273 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

274. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 274 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

275. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 275 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

276. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 276 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

277. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 277 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

278. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 278 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

279. Denies knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 279 of the Supplemental Petition.

280. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 280 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

281. Denies knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 281 of the Supplemental Petition.

282. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 282 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

283. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 283 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

284. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 284 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

285. Denies the allegations contained in paragraph 285 of the Supplemental Petition.

286. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 286 of the Supplemental Petition, and denies any practice of preventing the creation of written records with regards to the Seven Springs projects.

287. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 287 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

288. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 288 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

289. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 289 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

290. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 290 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

291. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 291 of the Supplemental Petition.

292. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 292 of the Supplemental Petition.

293. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 293 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

294. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 294 of the Supplemental Petition.

295. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 295 of the Supplemental Petition.

296. Admits the allegations contained in paragraph 296 of the Supplemental Petition.

297. Denies knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 297 of the Supplemental Petition.

298. Denies knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 298 of the Supplemental Petition.

299. Admits the allegations contained in paragraph 299 of the Supplemental Petition.

300. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 300 of the Supplemental Petition.

301. Admits counsel's acceptance of service. Denies knowledge or information sufficient to form a belief as to the truth of the remaining allegations set forth in paragraph 301 of the Supplemental Petition.

302. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 302 of the Supplemental Petition.

303. Admits the allegations contained in paragraph 303 of the Supplemental Petition.

304. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 304 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

305. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 305 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

306. Admits only that on September 19, 2019 an action was filed in the United States District Court for the Southern District of New York, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

307. Admits the allegations contained in paragraph 307 of the Supplemental Petition, but respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

308. Admits only that the DANY investigation was covered extensively by the press, but otherwise denies knowledge of the allegations contained in paragraph 308 of the Supplemental Petition.

309. Admits that there has been correspondence between counsel for the Trump Organization and the OAG, but otherwise denies knowledge of the allegations contained in paragraph 309 of the Supplemental Petition.

310. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 310 of the Supplemental Petition.

311. Admits only that the OAG corresponded with Trump Organization on or about July 21, 2021, but otherwise denies knowledge of the allegations contained in paragraph 311 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

312. Admits only that the OAG corresponded with Trump Organization on or about July 21, 2021, but otherwise denies knowledge of the allegations contained in paragraph 312 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

313. Admits only that the OAG corresponded with the Trump Organization on April 27, 2021, but otherwise denies knowledge of the allegations contained in paragraph 313 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

314. Admits the allegations contained in paragraph 314 of the Supplemental Petition.

315. Admits only that Mr. Trump is aware of assertions made in counsel's Motion to Quash and supporting documents dated January 3, 2022 (ECF 321-54), and Reply in Support of the Motion to Quash, dated February 1, 2022 (ECF 632-642), but otherwise denies knowledge of the allegations contained in paragraph 315 of the Supplemental Petition.

316. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 316 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

317. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 317 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

318. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 318 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

319. Admits the allegations contained in paragraph 319 of the Supplemental Petition.

320. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 320 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

321. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 321.

322. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 322.

323. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 323 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

324. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 324 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

325. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 325 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

326. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 326 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

327. Denies knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 327 of the Supplemental Petition.

328. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 328 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

329. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 329 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

330. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 330 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

331. Denies knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 331 of the Supplemental Petition.

332. Denies knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 332 of the Supplemental Petition.

333. Denies knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 333 of the Supplemental Petition.

334. Denies knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 334 of the Supplemental Petition.

335. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 335 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

336. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 336 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

337. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 337 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

338. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 338 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

339. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 339 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

340. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 340 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

341. Denies the allegations contained in paragraph 341 of the Supplemental Petition.

342. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 342 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

343. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 343 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

344. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 344 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

345. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 345 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

346. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 346 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

347. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 347 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

348. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 348 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

349. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 349 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

350. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 350 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

351. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 351 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

352. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 352 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

353. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 353 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

354. Denies the allegations contained in paragraph 354 of the Supplemental Petition.

355. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 355 of the Supplemental Petition, except admits that Donald Trump, Jr. is an Executive Vice President of the Trump Organization who manages the Trump Organization with Eric Trump.

356. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 356 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

357. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 357 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

358. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 358 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

359. Admits that Ivanka Trump was an executive and left the company in 2017 and denies knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 359 of the Supplemental Petition.

360. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 360 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

361. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 361 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

362. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 362 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

363. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 363 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

364. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 364 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

365. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 365 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

366. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 366 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

367. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 367 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

368. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 368 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

369. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 369 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

370. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 370 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

371. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 371 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

372. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 372 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

373. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 373 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

374. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 374 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

375. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 375 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

376. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 376 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

377. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 377 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

378. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 378 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

379. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 379 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

380. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 380 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

381. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 381 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

382. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 382 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

383. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 383 of the Supplemental Petition, and respectfully refers the Court to the cited documents for the true, accurate, and contextual meaning thereof.

CLAIM FOR RELIEF

384. Repeat and reallege the responses to the allegations contained in the proceeding paragraphs as through fully set forth herein.

385. Denies the allegations contained in paragraph 385 of the Supplemental Petition.

386. Denies the allegations contained in paragraph 386 of the Supplemental Petition.

387. Denies the allegations contained in paragraph 387 of the Supplemental Petition.

FIRST AFFIRMATIVE DEFENSE
(Statute of Limitations)

388. The applicable statute of limitations has expired and the OAG is barred from bringing an action.

SECOND AFFIRMATIVE DEFENSE
(Selective Prosecution)

389. This action arises from Petitioner’s selective prosecution of Respondent. Respondent incorporates by reference herein his Motion to Quash and supporting documents dated January 3, 2022 (ECF 321-54), and Reply in Support of the Motion to Quash, dated February 1, 2022 (ECF 632-642).

THIRD AFFIRMATIVE DEFENSE
(Circumvention of Respondent’s Rights)

390. The OAG is actively participating in a criminal prosecution where a grand jury is impaneled, and which criminal investigation is targeting certain people – including Respondent – and circumstances. Simultaneous to conducting this criminal investigation, the OAG has requested testimony that will be used in the criminal investigation under the guise of a supposedly administrative “Office” subpoena. Such circumvention is impermissible and violates the rights Respondent under the New York Constitution and CPL 190.40.

FOURTH AFFIRMATIVE DEFENSE
(Standing)

391. The Supplemental Petition should be dismissed in its entirety because Petitioner lacks standing under Executive Law § 63(12) because its investigation exceeds its statutory authority granted thereunder.

FIFTH AFFIRMATIVE DEFENSE
(Business Judgment Rule)

392. The Supplemental Petition is barred in whole or in part by the business judgment rule.

SIXTH AFFIRMATIVE DEFENSE**(Documentary Evidence)**

393. The Supplemental Petition and any subsequent action are barred in whole or in part by documentary evidence.

SEVENTH AFFIRMATIVE DEFENSE**(Impermissible Search)**

394. The subject subpoenas and subsequent requests for documents, information and testimony made by Petitioner are objectionable in that, among other things, they call for irrelevant and immaterial records, are overly broad and unduly burdensome, and do not state the documents sought with reasonable particularity.

WHEREFORE, Respondent, Donald J. Trump, demands judgment in his favor and against Petitioner dismissing the Supplemental Petition in its entirety, together with costs and disbursements, and for such other relief as this Court deems just and proper.

Dated: February 14, 2022
New York, New York



Alina Habba, Esq.
Habba Madaio & Associates, LLP
1430 U.S. Highway 206, Suite 240
Bedminster, NJ 07921
-and-
112 West 34th Street, 17th & 18th Floors
New York, NY 10120
Phone: (908) 869-1188
Fax: (908)-450-1881
ahabba@ahabbalaw.com
Attorneys for Respondent, Donald J. Trump