

Exhibit D:

March 16, 2022 Email from John Wilson to
Austin Thompson

Thompson, Austin

From: John Wilson <jwilson@haystackid.com>
Sent: Wednesday, March 16, 2022 10:17 PM
To: Thompson, Austin; Alan Garten; Faherty, Colleen; Wallace, Kevin; Finkelstein, Alex; Podolny, Paige; Stern, Samantha
Cc: Matthew L. Miller, Esq.; Lawrence Rosen; Amy Carlin
Subject: Re: People v. Trump Organization, Index No. 451685/2020 N.Y. Cty. Sup. Ct.

Dear Austin,

I want to provide an update and clarification on several points in your letter to TTO.

First, I want to assure you that Haystack has been conducting its investigation independently and without any interference from TTO. TTO has not denied Haystack access to any source of potentially responsive material and has been fully cooperative and promptly responded to all of our requests. Second, Haystack has been making diligent progress in its investigation. Haystack has been working to rapidly complete interviews. We understand the importance of moving quickly, and we are making it a priority.

Haystack has completed item four of the Stipulation. Haystack anticipates completing item one of the Stipulation within two weeks. As for items two and three of the Stipulation, Haystack likewise estimates that it will complete its interviews of custodians identified on the three lists below by within the next two weeks. Our current progress is below:

Docket.314 (Stipulated Order) (25 custodians listed)

16	Complete
7	Former employees (seeking to contact)
2	Remaining to be scheduled
25	25 Total

NYAG Ltr-9.30.21 pages 12 -13 (42 other custodians listed)

34	Complete
4	Former employees (seeking to contact)
0	Remaining to be scheduled
4	Scheduled for this week
42	42 Total

NYAG 2021.11.01.tto.letter Tab A (14 executive assistants and additional custodians listed)

3	Complete
10	Former employees (seeking to contact)
0	Remaining to be scheduled
1	Scheduled
14	14 Total

We expect to complete our interviews of additional potential custodians identified during our primary interviews by mid-April (subject to scheduling).

Your letter suggests that Haystack should provide more detailed monthly reports, and also perform the collections and searches described in item 5 of the Stipulation. The scope of Haystack's work as the independent eDiscovery Firm is governed by a December 7, 2021 Project Agreement between Haystack and TTO. Per that agreement, TTO engaged Haystack to perform items one through four of the September 2, 2021 Stipulated Order. There is no reporting requirement in those items. However, we understand that TTO and your office agreed on monthly *progress* reports, which we have been doing. Haystack has not been engaged to perform item five of the Stipulated Order (which would be a significant undertaking, requiring detailed instructions, and a modified Project Agreement), nor to issue more detailed monthly reports. I further note that preparation of a detailed report would require significant time and effort (estimated to be at least 10 days). It could not be prepared in just days, as suggested in your letter, and its preparation would divert resources away from conducting interviews and delay completion of our work.

Haystack will continue to perform its independent investigation proficiently and diligently. It will also continue to issue monthly progress reports. It will issue a detailed report after it completes its investigation. My team and I remain willing and able to perform additional work if we are engaged to do so. Please let me know if you have any questions.

Best regards,

John Wilson

HAYSTACK

John Wilson
Chief Information Security Officer
ACE AME CBE

Phone +1 (773) 710-7448
Email jwilson@haystackid.com



From: Thompson, Austin <Austin.Thompson@ag.ny.gov>

Date: Wednesday, March 9, 2022 at 3:29 PM

To: John Wilson <jwilson@haystackid.com>, Alan Garten <alan.garten@trumporg.com>, Faherty, Colleen <Colleen.Faherty@ag.ny.gov>, Wallace, Kevin <Kevin.Wallace@ag.ny.gov>, Finkelstein, Alex <Alex.Finkelstein@ag.ny.gov>, Podolny, Paige <Paige.Podolny@ag.ny.gov>, Stern, Samantha <Samantha.Stern1@ag.ny.gov>

Cc: Matthew L. Miller, Esq. <mmiller@haystackid.com>, Lawrence Rosen <lrosen@lhr gb.com>, Amy Carlin <ACarlin@lhr gb.com>

Subject: RE: People v. Trump Organization, Index No. 451685/2020 N.Y. Cty. Sup. Ct.

[EXT]

Larry and John,

I've attached a letter. We look forward to hearing from you promptly.

Best,
Austin

From: John Wilson <jwilson@haystackid.com>
Sent: Friday, February 18, 2022 5:25 PM
To: Thompson, Austin <Austin.Thompson@ag.ny.gov>; Alan Garten <alan.garten@trumporg.com>; Faherty, Colleen <Colleen.Faherty@ag.ny.gov>; Wallace, Kevin <Kevin.Wallace@ag.ny.gov>; Finkelstein, Alex <Alex.Finkelstein@ag.ny.gov>; Podolny, Paige <Paige.Podolny@ag.ny.gov>; Stern, Samantha <Samantha.Stern1@ag.ny.gov>
Cc: Matthew L. Miller, Esq. <mmiller@haystackid.com>; Lawrence Rosen <lrosen@lhrgb.com>; Amy Carlin <ACarlin@lhrgb.com>
Subject: Re: People v. Trump Organization, Index No. 451685/2020 N.Y. Cty. Sup. Ct.

Good afternoon,

I am writing to provide the attached status update detailing HaystackID's ongoing work.

~ Forensic Collections ~ Early Case Insight ~ Processing ~ Hosting ~ Attorney Review ~

Please note that my working hours might vary substantially from yours. Thus, please do not feel any pressure or obligation to respond to messages on my schedule.

Regards,

HAYSTACK

John Wilson
Chief Information Security Officer
ACE AME CBE

Phone +1 (773) 710-7448
Email jwilson@haystackid.com



From: John Wilson <jwilson@haystackid.com>
Date: Monday, January 17, 2022 at 1:21 PM
To: Thompson, Austin <Austin.Thompson@ag.ny.gov>, Alan Garten <alan.garten@trumporg.com>, Faherty, Colleen <Colleen.Faherty@ag.ny.gov>, Wallace, Kevin <Kevin.Wallace@ag.ny.gov>, Finkelstein, Alex <Alex.Finkelstein@ag.ny.gov>, Podolny, Paige <Paige.Podolny@ag.ny.gov>, Stern, Samantha <Samantha.Stern1@ag.ny.gov>
Cc: Matthew L. Miller, Esq. <mmiller@haystackid.com>, Lawrence Rosen <lrosen@lhrgb.com>, Amy Carlin

<ACarlin@lhr gb.com>

Subject: Re: People v. Trump Organization, Index No. 451685/2020 N.Y. Cty. Sup. Ct.

Good afternoon,

I am writing to provide the attached status update detailing HaystackID's ongoing work.

Regards,

John Wilson
Chief Information Security Officer
Phone +1 (773) 710-7448

From: Thompson, Austin <Austin.Thompson@ag.ny.gov>

Date: Friday, December 31, 2021 at 3:39 PM

To: John Wilson <jwilson@haystackid.com>, Alan Garten <alan.garten@trumporg.com>, Faherty, Colleen <Colleen.Faherty@ag.ny.gov>, Wallace, Kevin <Kevin.Wallace@ag.ny.gov>, Finkelstein, Alex <Alex.Finkelstein@ag.ny.gov>, Podolny, Paige <Paige.Podolny@ag.ny.gov>, Stern, Samantha <Samantha.Stern1@ag.ny.gov>

Cc: Matthew L. Miller, Esq. <mmiller@haystackid.com>, Lawrence Rosen <lrosen@lhr gb.com>, Amy Carlin <ACarlin@lhr gb.com>

Subject: Re: People v. Trump Organization, Index No. 451685/2020 N.Y. Cty. Sup. Ct.

[EXT]

Thanks John. We appreciate that you are attempting to remain independent, but we don't agree that conducting this project without reporting to or oversight by OAG makes sense or is contemplated by the stipulated order.

OAG asked the Trump Organization to retain a third party on November 1. On November 19, the Trump Organization designated Haystack. OAG promptly interviewed you on two occasions; checked two of your references; and, given Haystack's prior work with the Trump Organization, asked Haystack and the Trump Organization for assurances regarding Haystack's independence and ability to perform this project promptly. Based on those representations, among other things, we provided approval for Haystack to begin work.

It is our understanding that, because of the Trump Organization's delay in retaining Haystack and the holidays, Haystack has not made significant progress as of today, December 31. That is a significant delay, especially when Haystack has not provided any estimated completion date. As Haystack ramps up its work, OAG needs to be able to monitor and verify both Haystack's and the Trump Organization's compliance with the stipulated order—OAG uncovered the issues that necessitated Haystack's involvement and Haystack is ensuring compliance with OAG's subpoenas. Acknowledging that need, paragraph 6 of the stipulated order requires “[t]o issue monthly reports to the Stipulating Parties articulating its progress carrying out the responsibilities described herein, and identifying any source of potentially responsive materials to which it has not been provided access.”

Given developments since the stipulation was signed, including the identification of numerous custodians and sources of information—and the delay in Haystack's initiation of the project—we think weekly reports and discussions would make more sense. It is in all parties' shared interest for Haystack to complete its work in a way satisfactory to both OAG and

the Trump Organization. If the Trump Organization won't agree that Haystack will provide interim updates along the lines described in John's December 23 email below, we'll need to bring the matter before Justice Engoron.

Larry and Amy, we appreciate that folks are beginning a holiday weekend; let's schedule a call on Tuesday morning to discuss the Trump Organization's position. Because Haystack has said that they will do whatever OAG and the Trump Organization agree on, John does not need to join. I will send you a calendar invitation for 10 AM—please let us know if you prefer another time.

Best,
Austin

From: John Wilson <jwilson@haystackid.com>
Date: Wednesday, December 29, 2021 at 1:27 PM
To: Thompson, Austin <Austin.Thompson@ag.ny.gov>, Alan Garten <alan.garten@trumporg.com>, Faherty, Colleen <Colleen.Faherty@ag.ny.gov>, Wallace, Kevin <Kevin.Wallace@ag.ny.gov>, Finkelstein, Alex <Alex.Finkelstein@ag.ny.gov>, Podolny, Paige <Paige.Podolny@ag.ny.gov>, Stern, Samantha <Samantha.Stern1@ag.ny.gov>
Cc: Matthew L. Miller, Esq. <mmiller@haystackid.com>, Lawrence Rosen <lrosen@lhrgb.com>, Amy Carlin <ACarlin@lhrgb.com>
Subject: Re: People v. Trump Organization, Index No. 451685/2020 N.Y. Cty. Sup. Ct.

Good afternoon,

I hope you all had a joyous holiday. Following up on my December 23 email, I want to let the parties know that as the designated independent, HaystackID is continuing to move forward under the current scope of work to which we are engaged on by the Trump Organization – working through items one through four of the Stipulation.

HaystackID's last call with the NYAG was held for the purpose of answering questions related to the finalized investigative plan detailing the work HaystackID would be performing to complete items one through four of the Stipulation. During that call, the NYAG requested additional information, as noted in my December 23 email, that went beyond the scope of HaystackID's engagement agreement and the pre-negotiated Stipulation. To that end, after conferring with HaystackID's outside counsel Latham & Watkins, HaystackID will not be participating in additional calls with the NYAG, or entertaining additional requests while investigative tasks are ongoing, as not to compromise HaystackID's role as an independent. Of course, should the NYAG and the Trump Organization agree to modify the Stipulation, and amend HaystackID's engagement agreement accordingly, Haystack will be ready, willing, and able to perform those tasks.

Haystack will continue to work on behalf of both parties, completing the designated work as quickly, and thoroughly as possible.

Thank you,

~ Forensic Collections ~ Early Case Insight ~ Processing ~ Hosting ~ Attorney Review ~

HaystackID will be closed on Friday, December 24th in observance of Christmas and Friday, December 31st in observance of New Year's Day.

Please note that my working hours might vary substantially from yours. Thus, please do not feel any pressure or obligation to respond to messages on my schedule.

Regards,

HAYSTACK

John Wilson
Chief Information Security Officer
ACE AME CBE

Phone +1 (773) 710-7448
Email jwilson@haystackid.com



From: Thompson, Austin <Austin.Thompson@ag.ny.gov>

Date: Friday, December 24, 2021 at 12:34 PM

To: John Wilson <jwilson@haystackid.com>, Alan Garten <alan.garten@trumporg.com>, Faherty, Colleen <Colleen.Faherty@ag.ny.gov>, Wallace, Kevin <Kevin.Wallace@ag.ny.gov>, Finkelstein, Alex <Alex.Finkelstein@ag.ny.gov>, Podolny, Paige <Paige.Podolny@ag.ny.gov>, Stern, Samantha <Samantha.Stern1@ag.ny.gov>

Cc: Matthew L. Miller, Esq. <mmiller@haystackid.com>, Lawrence Rosen <lrosen@lhr gb.com>, Amy Carlin <ACarlin@lhr gb.com>

Subject: RE: People v. Trump Organization, Index No. 451685/2020 N.Y. Cty. Sup. Ct.

[EXT]

John,

We'll respond on the rest next week, but because we'd like you to get up to speed as quickly as possible, I've attached the Trump Organization's weekly reporting since the Stipulated Order.

A good holiday / weekend to all.

Best,
Austin

From: John Wilson <jwilson@haystackid.com>
Sent: Thursday, December 23, 2021 7:22 PM
To: Alan Garten <alan.garten@trumporg.com>; Faherty, Colleen <Colleen.Faherty@ag.ny.gov>; Thompson, Austin <Austin.Thompson@ag.ny.gov>; Wallace, Kevin <Kevin.Wallace@ag.ny.gov>; Finkelstein, Alex <Alex.Finkelstein@ag.ny.gov>; Podolny, Paige <Paige.Podolny@ag.ny.gov>; Stern, Samantha <Samantha.Stern1@ag.ny.gov>
Cc: Matthew L. Miller, Esq. <mmiller@haystackid.com>
Subject: People v. Trump Organization, Index No. 451685/2020 N.Y. Cty. Sup. Ct.

[EXTERNAL]

Good evening,

I hope is well with everyone as we head into the holiday week.

A few housekeeping items to get in order:

1. We understand from NYAG that the Trump Organization is providing weekly updates to the NYAG, can you please also forward those to us?
2. I wanted to raise the issue of reporting for this project. The NYAG would like to receive weekly reports from HaystackID in its role as an independent for this project.
 - a. HaystackID would like confirmation from both parties that weekly reporting is acceptable?
 - b. The contents of the weekly report would include:
 - i. Overall engagement status
 1. Recent accomplishments
 2. Next week's activities
 3. Any new requests?
 - ii. Project health
 1. Are we on schedule?
 2. Are we within scope?
 3. Are additional/less resources needed?

4. Budget status?
5. Any issues?
3. Further to the reporting request, the NYAG would like to have weekly status calls to discuss the previous week's report.
 - a. The NYAG would like to receive the reporting on Tuesdays and the weekly calls on Wednesdays at 4 PM ET.
 - b. Is a weekly status call approved by both parties?
 - i. If yes, Would the Trump Organization also like a weekly status call?
4. The NYAG would also like to receive an estimated timeline for completion of items one thru four of the stipulated order.
 - a. HaystackID is working towards putting a timeline together and expects to have an estimated timeline late in the first week of January.
 - b. Can HaystackID share its work timelines with both parties?
5. For the custodian interviews, HaystackID would like to know for scheduling purposes, will there be counsel present for each interview?
 - a. HaystackID would like a response from both parties?
 - b. Will we be sharing the information from each custodian interview with both parties after the interview is completed?
 - i. Will they be shared shortly after completed?
 - ii. As part of the final report?

Please provide replies as requested so we can move the plan forward.

Warm regards and holiday wishes

John Wilson

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Out of Office Notice – I will be out of the office from Friday, December 24th to Jan 3rd, 2022.

HaystackID will be closed on Friday, December 24th in observance of Christmas and Friday, December 31st in observance of New Year's Day.

Please note that my working hours might vary substantially from yours. Thus, please do not feel any pressure or obligation to respond to messages on my schedule.

Regards,



John Wilson
Chief Information Security Officer
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