

AFFIDAVIT OF KATHLEEN MEESE

STATE OF NEW YORK)
)ss.:
COUNTY OF SCHOHARIE)

KATHLEEN MEESE being duly sworn, deposes and says:

1. I reside at 613 Sunnyside Road, Schoharie, New York 12157.
2. I make this statement concerning the business acts and practices of Trump University (“Trump”) of my own knowledge.
3. I received an invite in the mail in June 2009, from Trump for a free two hour seminar in real estate at the Palace Theater in Schenectady. At that seminar, we were told that if we signed up for Trump’s three-day seminar, we would learn everything we needed to know about investing in real estate and about how to buy and sell real estate using other people’s money. We were also told that at the three-day seminar we would get to have our pictures taken with Donald Trump. It ended up being a cardboard cutout of Mr. Trump.
4. I attended the three-day seminar at Hyatt Place Saratoga/Malta, 20 State Farm Place, Malta, New York, 12020, for \$1,495.
5. Steven Goff was one of the speakers at the three-day seminar. The other two — Tiffany Brinkman and Scott Leitzell — did not speak as much. Mr. Goff said that he was trained to teach our seminar by Donald Trump’s main real estate advisor. He also told us that he started out with nothing and had no money before he began buying real estate using Trump techniques. Mr. Goff said that Mr. Trump “handpicked” him to teach the session because he had worked with Mr. Trump before through his brother Chris Goff. He also said that New York was Mr. Trump’s home state and he would never send

anyone other than the best of the best to teach there, and that he, Steven Goff, was the best of the best.

6. Mr. Goff made you feel that Donald Trump was going to review everything that was taught during the program.

7. I thought we were going to learn everything we needed to know about buying and selling real estate at the three-day seminar. However, the information Trump provided was very vague and did not prepare me to invest in real estate on my own. Trump staff gave us the pitch about going the extra mile and enrolling in the Trump Elite programs, because “Donald Trump will not steer you wrong and that is how he made his money.” They also said that Donald Trump sent them to teach the seminar because Mr. Trump is trying to help us make money.

8. While the other Trump instructors spoke to the class, Mr. Goff pulled people aside one by one and told us that we would make money faster if we enrolled in Trump Elite programs and worked with a personal mentor. Mr. Goff asked me if I could come up with \$25,000 to sign up for the Gold Elite Program. I told him that I had a credit card with a \$30,000 limit, but I did not want to pay that much for the Trump Gold Elite program.

9. I told Mr. Goff that I could not fly to the Trump Elite seminars because I have a son with Down 's syndrome and a protein deficiency who needs to be close to the hospital in case he needs to receive his medical treatments. Mr. Goff told me that I had to sign up for Trump Gold Elite for \$25,000 to help my family. He said he had a son, so he knew how family meant everything to me. He said that I had to find resources to invest in my future, promised to personally work with me, and guaranteed that I would make my \$25,000 back within sixty days.

10. Mr. Goff told us to write a check to ourselves for \$1,000,000 payable three years from that day, saying that we will be able to cash it then with the profit from our real estate investments.

11. During the seminar, one of the homework assignments required everyone to bring to class a list of properties for sale in our area. Mr. Goff was going to call the contacts for those properties and negotiate deals with them over the phone for the whole class to hear. However, he told the whole class that he was going to work with me personally on the properties that I found. I did not sign the agreement to enroll in the Trump Elite program until Mr. Goff told the class he was going to work with me personally.

12. Mr. Goff also promised to send me a work plan that he designed, supposedly worth \$5,000, for free, but when I received it, it turned out to be the same kind of material we were taught in the three-day seminar.

13. Because Mr. Goff promised to personally work with me, I bought the Trump Gold Elite package for \$25,000. However, I called him in three days, the last day I could cancel the program, and told him that I could not go through with the program and could not spend that money on Trump. Mr. Goff reassured me and reiterated his promise to work with me personally. He said that he was not going to let me quit, that he knew I was scared, but that I shouldn't be because he was going to be there working with me every step of the way.

14. Mr. Goff called me in a few days, when it was already too late to cancel the mentorship program, and told me that instead of coming to work with me personally, he was sending another mentor, Medith Webb. All I was told about Mr. Webb was that he was hired by Trump as a mentor and he was from Oklahoma City.

15. Mr. Goff also promised to call the owners of the properties that I gave him during the three-day seminar, but he never called anyone. I checked with the owners and they have never heard from him or anyone from Trump.

16. I wrote a letter to Steven Goff and sent it to Trump before Mr. Webb arrived for our mentorship session. I demanded my \$25,000 back because Mr. Goff lied to me — he never called any of the property owners and he was not working with me personally as promised. I received a call about my letter from Jason Schauer at Trump and I re-iterated to him what I wrote in the letter to Trump.

17. Because of the confusion before Mr. Webb's rushed arrival to New York to work with me, Mr. Webb and I ended up looking at some rental properties that were not for sale. Mr. Webb talked to the owners so that I could see how to talk to people about properties, what to ask, and how to negotiate. Mr. Webb asked me to give him a good evaluation, and I did because he did what Mr. Goff told him to do and was a nice man.

18. Mr. Webb said it was his fault I wasn't prepared for our meeting, and that he had never mentored anyone on such a short notice as usually mentees need time to prepare. I told Mr. Webb that Mr. Goff sent him so fast because I wanted my money back. I told Mr. Webb that Mr. Goff lied about everything and that I was still dissatisfied with Trump because Mr. Goff promised to personally help me and he did not keep his promise.

19. As part of the Gold Elite program, I was promised a lifetime membership with Trump, unlimited phone calls to Mr. Goff, to my mentor and others at Trump, including Tiffany Brinkman and Jason Schauer, access to website seminars, webinars, real estate leads, and legal forms for life, but nothing is available any longer. Trump

speakers and mentors all gave me their phone numbers, but none of them work at Trump any more, and I have not been able to get in touch with anyone after I signed up for the Trump Gold Elite program. In December 26, 2010, I received an automatic email that said that I would no longer have access to the foreclosure sites. Jason Schauer is no longer working at Trump and none of the other phone numbers work.

20. I was unable to get my refund and am still paying off debts from my Trump tuition. Donald Trump received \$25,000 of my money. For my \$25,000, I have a lifetime membership to nothing! No one contacted me and I have not been able to contact anyone because the phone numbers have been all disconnected. There is no Trump University.

Kathleen Meese
KATHLEEN MEESE

Sworn before me this 16 day of August, 2012

Angela R Frank
Notary Public
State of NY
My Commission Expires: 1/23/14

ANGELA R. FRANK
Notary Public, State of New York
Qual. in Mont. Co. No. 01FR6140157
My Commission Expires Jan. 23, 2014