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24 UNITED STATES DISTRICT COURT
25 SOUTHERN DISTRICT OF CALIFORNIA

26 TARLA MAKAEFF, et al., on Behalf of
27 Themselves and All Others Similarly
28 Situated,

Plaintiffs,

vs.

TRUMP UNIVERSITY, LLC, et al.,

Defendants.

Case No.: 3:10-CV-00940-CAB(WVG)

CLASS ACTION

**DECLARATION OF CORINNE SOMMER
DECLARATION IN SUPPORT OF
PLAINTIFFS' MOTION FOR CLASS
CERTIFICATION**

District Judge: Hon. Cathy Ann Bencivengo
Magistrate Judge: Hon. William V. Gallo

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1 I Corinne Sommer, hereby declare and state as follows:

2 1. I am a resident of New York, New York. If called as a witness, I could and
3 would competently testify as to all facts within my personal knowledge.

4 2. I worked for Trump University from May 2007 through October 2007. My title
5 was Manager of Events Department. I worked at Trump University’s headquarters located at
6 40 Wall Street, New York, New York, which is also where Trump Organization is located.
7 My job duties as Manager of the Events Department included the coordination of Trump
8 University live events, seminars and training.

9 3. The first Trump University live event took place in Florida in May of 2007, and
10 the second one took place in Los Angeles, California approximately one month later. Before
11 these two live events, my understanding is that Trump University “courses” were only offered
12 online. These two events had approximately 500 attendees each. After that, Trump University
13 held live seminars nearly every week in different areas of the country.

14 4. In my experience, the focus of Trump University was on making sales rather
15 than on providing quality educational services. Trump University would lure consumers into
16 the initial free course based upon the name and reputation of Donald Trump, and then once
17 they were there, Trump University personnel would try to up-sell consumers to the next course
18 using high-pressure sales tactics. Far from providing a “complete real estate education,” as
19 advertised, Trump University personnel only provided enough information to get students to
20 sign up for the next seminar or program. I recall instances in which consumers had paid for a
21 class to learn how to make money investing in real estate, ask for more information, and the
22 teacher would say, “if you want to get that, you have to buy the next package.” I don’t
23 remember who said it, but this is the general gist of things.

24 5. During the time that I was employed at Trump University, many of the
25 speakers, instructors, and mentors lacked real estate experience. Many of them did not even
26 own houses, and had no experience buying or selling real estate. For example, I recall that
27 David Stamper had no real estate experience; he was a jewelry salesman. However, after
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1 working for Trump University for approximately a year on the sales team, he began speaking
2 as an instructor at seminars.

3 6. Trump University instructors and mentors were not hand-picked by Donald
4 Trump. I believe that in many instances Donald Trump had neither met the instructors or
5 mentors, nor did he know who they were. Instead, I recall that Trump University hired its
6 speakers and mentors through Mark Dove in New Hampshire who hired and trained a number
7 of real estate salespeople that he provided to Trump University. These people did not
8 necessarily have real estate experience, but they were skilled at high-pressure sales. I recall
9 that Trump University fired two of Mike Dove's salespeople because they kept trying to get
10 Trump University students to invest in their own personal businesses.

11 7. I am aware that instructors were trained to, and witnessed them, asking students
12 during the \$1,500 seminars to call their credit card companies and raise their credit limits two,
13 three or four times so that they would be able to invest in real estate. They would tell students
14 to max out their credit card because they would make their money back. They couldn't raise
15 their limit and use it the same day.

16 8. While Trump University's advertisements claimed it wanted to help consumers
17 make money in real estate, in fact, based upon my experience, I believe that Trump University
18 was only interested in selling every person the most expensive seminars they could possibly
19 buy on credit. I recall that some consumers had showed up who were homeless and could not
20 afford the seminars, yet I overheard Trump University representatives telling them, "it's ok;
21 just max out your credit card." I also witnessed representatives instructing consumers to
22 charge the course to multiple credit cards if they lacked a high enough limit on one credit card
23 to pay for the seminar. In fact, I recall representatives telling consumers to open up as many
24 credit cards as they could to increase their credit score.

25 9. Trump University used a standardized PowerPoint presentation and scripts for
26 all of its seminars, so that the seminars were standardized and substantially the same across the
27 country regardless of the particular speaker or location. A few speakers had their own, but
28 those who did not were given presentations.

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1 10. Trump University did not provide one-year of real estate mentoring as promised
2 to the public. My understanding is that mentors were paid up front on commission before the
3 student completed their mentorship. Because of the pay structure, mentors had no incentive to
4 call consumers back or work with them once the consumer signed up and the mentor was paid.
5 The focus of the mentors seemed to be on getting new sales and new commissions. As a
6 result, I recall that mentors rarely returned phone calls from students or spent much time
7 talking with them. I received calls from many angry students telling me that they had been
8 trying to reach their mentor to no avail.

9 11. I do not believe that Trump University taught Donald Trump’s investing
10 “secrets.” Donald Trump came from a wealthy family and had resources at his disposal to
11 purchase real estate – that is the secret – one that the average consumer could not replicate.

12 12. At the seminars I attended, Trump University presenters pressured consumers
13 into purchasing the Elite program because they said that students would make their money
14 back in the first deal or two. They told students that even though \$25,000 or \$35,000 for the
15 Elite program sounded like a lot of money, “Don’t worry, you’ll get your money back right
16 away in your first deal, or first two deals.”

17 13. In the time that I worked for Trump University, I only met Donald Trump once.
18 He was not an active presence there; though he occasionally went over numbers with Michael
19 Sexton. Based upon my interaction with Donald Trump, he seemed only concerned with
20 Trump University’s revenues and profits.

21 14. In my experience, many students were dissatisfied with Trump University.
22 When consumers first signed up and took the course, they were hyped up due to the high-
23 drama atmospherics of the seminars, and they tended to give positive reviews as they were
24 asked for them. But, after purchasing the Elite Program, I saw many students who realized
25 they did not get what they were promised, and they were unable to get through to their mentor,
26 and then they became more and more dissatisfied over time.

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I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 19 day of September, 2012, at New York, New York.



CORINNE SOMMER

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