

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF DUTCHESS

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ROBERT S. TRUMP,

Plaintiff,

- against -

MARY L. TRUMP and SIMON & SCHUSTER,  
INC.,

Defendants.  
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Index No. 2020-51585

**AFFIRMATION OF ANNE  
CHAMPION IN SUPPORT OF  
OPPOSITION TO  
PLAINTIFF’S MOTION FOR  
PRELIMINARY INJUNCTION  
AND TEMPORARY  
RESTRAINING ORDER**

I, Anne Champion, an attorney duly admitted to practice before the courts of the State of New York and not a party in the above-captioned action, affirm under penalty of perjury, pursuant to CPLR 2106, that the following is true and correct:

1. I am a partner at the law firm of Gibson, Dunn & Crutcher LLP, counsel for Mary L. Trump in the above-captioned action. As such, I have personal knowledge of the facts set forth herein unless otherwise noted and if called upon to testify would testify competently thereto.
2. I respectfully submit this affirmation in support of Defendant Mary L. Trump’s Opposition to Plaintiff’s Motion for Preliminary Injunction and Temporary Restraining Order.
3. Attached hereto as Exhibit 1 is a true and correct copy of the Settlement Agreement dated April 10, 2001, between Donald J. Trump (in various capacities), Robert S. Trump (in various capacities), Maryanne Trump Barry (in various capacities), Fred C. Trump III, Mary L. Trump, Lisa Trump, Linda Trump, Apartment Management Associates, Inc., Trump Management, Inc., Louis De. Laurino, Stephen J. Schwartz, and John J. Barnovsky. **This Exhibit is filed under seal.**

4. Attached hereto as Exhibit 2 is a true and correct copy of a record obtained from the New York Department of State stating that no registration record can be found for Apartment Management Associates, Inc. We also checked the Delaware Department of State and found no registration for Apartment Management Associates, Inc. We were unable to identify any registration for this entity or to determine who its officers and directors are, if any.

5. Attached hereto as Exhibit 3 is a true and correct copy of a registration record for Trump Management, Inc., obtained from the New York Department of State, identifying John W. Walter as CEO of Trump Management, Inc.

6. Attached hereto as Exhibit 4 is a true and correct copy of a news article published on October 7, 2018 by Politico, titled “Did the Trump Family Historian Drop a Dime to the New York Times?”

7. Attached hereto as Exhibit 5 is a true and correct copy of a news article published on June 21, 2020 by Axios, titled “Trump Says Niece ‘Not Allowed’ to Write Book Because of Nondisclosure Agreement.”

8. Attached hereto as Exhibit 6 is a true and correct copy of a June 25, 2020 order issued by the Surrogate’s Court for the County of Queens, File No. 1999-3949/A.

9. Attached hereto as Exhibit 7 is a true and correct copy of a news article published on November 18, 2002 by New York Magazine, titled “New York’s Power Siblings.”

10. Attached hereto as Exhibit 8 is a true and correct copy of a news article published on January 2, 2016 by The New York Times, titled “For Donald Trump, Lessons From a Brother’s Suffering.”

11. Attached hereto as Exhibit 9 is a true and correct copy of a news article published on August 18, 2015 by The New York Times, titled “Familiar Talk on Women, From an Unfamiliar Trump.”

12. Attached hereto as Exhibit 10 is a true and correct copy of a news article published on January 17, 2016 by Page Six, titled “Donald Trump’s Brother Robert Emerges.”

13. Attached hereto as Exhibit 11 is a true and correct copy of a January 19, 2017 statement signed by Donald J. Trump, confirming his resignation from hundreds of business entities, including Trump Management, Inc.

14. Attached hereto as Exhibit 12 is a true and correct copy of a news article published on January 23, 2017 by CNN Money, titled “Trump Organization Documents Say He Has Resigned From More Than 400 Businesses.”

15. Attached hereto as Exhibit 13 is a true and correct copy of a news article published on June 15, 2020 by The Daily Beast, titled “Revealed: The Family Member Who Turned On Trump.”

16. Attached hereto as Exhibit 14 is a true and correct copy of a news article published on December 19, 2000 by the New York Daily News, titled “Inside Trumps’ Bitter Battle: Nephew’s Ailing Baby Caught In The Middle.”

17. Attached hereto as Exhibit 15 is a true and correct copy of a news article published on August 8, 2019 by The Washington Post, titled “Trump Pressured His Alcoholic Brother About His Career. Now He Says He Has Regrets.”

18. Attached hereto as Exhibit 16 is a true and correct copy of a news article published on December 2, 2008 by the New York Post, titled “Big Bucks At Stake in Another Trump Divorce.”

19. Attached hereto as Exhibit 17 is a true and correct copy of a news article published on July 2, 2020 by The Washington Post, titled “Now The World Can Read Mary Trump’s Blistering Book About Her Uncle. Holding It Back Would Have Been Pure Censorship.”

20. Attached hereto as Exhibit 18 is a true and correct copy of a news article published on October 2, 2018 by The New York Times, titled “Trump Engaged in Suspect Tax Schemes as He Reaped Riches From His Father.”

21. Attached hereto as Exhibit 19 is a true and correct copy of a news article published on October 26, 2019 by The Washington Post, titled “Company With Ties to Trump’s Brother Robert Awarded \$33 Million Government Contract.”

22. Attached hereto as Exhibit 20 is a true and correct copy of a news article published on December 6, 2019 by the Daily Mail, titled “Donald Trump’s Younger Brother Robert Says The President Is Doing ‘Fantastic’ Despite Impeachment Drama In Rare Interview At LAX.”

23. Attached hereto as Exhibit 21 is a true and correct copy of a webpage titled “About the Book,” published by Simon & Schuster, Inc., which includes a description of Mary L. Trump’s book, *Too Much and Never Enough: How My Family Created the World’s Most Dangerous Man*, available at <https://www.simonandschuster.com/books/Too-Much-and-Never-Enough/Mary-L-Trump/9781982141462> (last accessed July 2, 2020).

24. Attached hereto as Exhibit 22 is a true and correct copy of an Amazon webpage titled “Best Sellers in Books,” available at <https://www.amazon.com/best-sellers-books-Amazon/zgbs/books> (last accessed July 2, 2020).

25. Gwenda Blair’s 2000 book (reprinted in 2015), *The Trumps: Three Generations of Builders and a Presidential Candidate*, is a biography of the Trump family and “a world in which the aura of wealth alone can guarantee a fortune.” The book is reported to discuss the Trumps’ immigrant grandfather, his son, Fred Trump Sr.’s, construction of “hugely successful housing developments,” and the Trump children’s accession to the family fortune.

26. A search of book titles using Google search engine demonstrates that President of the United States Donald J. Trump has written at least nine books that contain discussion of his business and financial dealings. See, e.g., Donald Trump, *Trump: The Art of the Deal* (1987); Donald Trump, *Trump: Surviving on the Top* (1990); Donald Trump, *The Art of the Comeback* (1997); Donald Trump, *The America We Deserve* (2000); Donald Trump, *Trump: How to Get Rich* (2004); Donald Trump, *Trump: Think Like a Billionaire* (2004); Donald Trump, *Think Big: Make It Happen in Business and Life* (2007); Donald Trump & Robert Kiyosaki, *Midas Touch: Why Some Entrepreneurs Get Rich—And Why* (2011); Donald Trump, *Time to Get Tough: Making America #1 Again* (2011).

27. Additionally, a search of book titles using Google search engine demonstrates that President of the United States Donald J. Trump has had at least five books written about him, all of which discuss his business and financial dealings. See, e.g., Gwenda Blair, *The Trumps: Three Generations that Built an Empire* (2000); Timothy L. O'Brien, *TrumpNation: The Art of Being The Donald* (2005); David C. Johnston, *The Making of Donald Trump* (2016); Michael Kranish & Marc Fisher, *Trump Revealed: An American Journey of Ambition, Ego, Money, and Power* (2016); David Enrich, *Dark Towers: Deutsche Bank, Donald Trump, and an Epic Trail of Destruction* (2020). In addition, there have been multiple non-fiction accounts of his time as President, including Bob Woodward (*Fear*), John Bolton (*The Room Where It Happened*), and Omarosa Manigault Newman (*Unhinged*).

28. I hereby affirm under penalty of perjury of the laws of New York that the foregoing is true and correct.

Executed this 2nd day of July, 2020, at Iowa City, Iowa.



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Anne Champion