



ATTORNEY GENERAL OF TEXAS
GREG ABBOTT

January 6, 2010

Certified Mail No. 7005 2570 0000 2876 6089
Return Receipt Requested

TO: Trump University, LLC
40 Wall St., 32nd Floor
New York, NY 10005-1304

CIVIL INVESTIGATIVE DEMAND

Pursuant to the authority granted by Section 17.61 of the Texas Deceptive Trade Practices and Consumer Protection Act, Sections 17.41 *et seq.* of the TEX. BUS. & COM. CODE ANN., you are hereby directed to produce the documentary material specified in Attachment A for inspection and copying.

You are to make available the material described in Attachment "A" to the person designated below as "authorized agent." Copies of the described documentary material may be sent certified mail or via courier to be received on or **before February 1, 2010 at our offices, located at 808 Travis, Suite 1520, Houston, Texas 77002.** Please refer to the additional instructions and definitions below.

This material is relevant to the subject matter of an investigation of possible violations of §17.46(a) and §17.46(b) of the Texas Deceptive Trade Practices—Consumer Protection Act. The general subject matter of this investigation is your company's advertising and business practices in connection with offering real estate investment classes to Texas consumers.


TAKE NOTICE THAT pursuant to §17.62, Tex. Bus. & Com. Code, any person who attempts to avoid, evade, or prevent compliance, in whole or in part, with this directive by removing, concealing, withholding, destroying, mutilating, altering, or by any other means falsifying any documentary material is guilty of a misdemeanor and on conviction is punishable by a fine of not more than \$5,000.00 or by confinement in the county jail for not more than one year, or both.

TAKE FURTHER NOTICE THAT information contained on your computer systems may be relevant to the investigation. No potentially discoverable data should be deleted or modified. Procedures that may alter or erase computer data should be suspended and affirmative steps should be taken to prevent deleting, overwriting, defragmenting or


compressing. Please preserve archived back-up tapes, local hard drives and network drives, floppy disks, and other portable drives, information on portable computers, and data from retired computers.

ISSUED: Wednesday, January 06, 2010.

Sincerely,

A handwritten signature in black ink, appearing to read "Rick Berlin", written over a horizontal line.

Rick Berlin
Assistant Attorney General
Consumer Protection and Public Health Division
808 Travis, Suite 1520
Houston, Texas 77002
(713) 223-5886

A handwritten signature in black ink, appearing to read "Carlos Fernandez, Jr.", written over a horizontal line.

Carlos Fernandez, Jr., Investigator
Authorized Agent
(713) 223-5886

DEFINITIONS AND INSTRUCTIONS

1. The terms “you” and “your” means Trump University, LLC, and all current and former predecessors, successors, affiliates, parent companies, subsidiaries, or wholly-owned or controlled entities, and any affiliated business venture or entity that is involved in providing the services of your business, and all principals, operating divisions, employees, servants, officers, directors, agents, representatives, attorneys, accountants, independent contractor or other persons or entities acting on behalf of or under the direction, authorization, or control of Trump University, LLC or their subsidiaries and affiliates involved in providing the services of your business.
2. “Document” shall be construed in its broadest possible sense to include within its scope all writings, recordings, photographs and things contemplated in TEX. R. CIV. P. 192.3(b) and TEX. R. EVID. 1001.
3. It is not sufficient to fail to provide responsive paper or electronic documents if you can obtain them from persons reasonably available to you or under your control. If any of the paper or electronic documents requested are in existence, but not in your possession, custody, or control, please identify the name and address of the person or firm having possession, custody, or control of said documents. If any paper or electronic document requested is no longer in existence, state whether it is missing, has been destroyed, or has been otherwise disposed of, and, in each instance, explain the circumstances surrounding, the reason for, and the manner of such disposition, and state the date or approximate date thereof and a description of its contents and subject matter.
4. If any paper or electronic documents called for in this request are not produced or given because of a claim of privilege, work product, or trade secret, state the privilege claimed and identify each such document by its title, date, originator(s) and recipient(s) and the identity and address of its custodian, and a brief description of the general subject matter of the document.
5. Electronic data should be provided in native format. If this information is not available in a readily accessible and usable form, you must include all necessary glossaries, keys, indices, and software necessary for interpretation of the material.
6. Each document and other tangible thing produced shall be clearly designated as to which Request, and each sub-part of a Request, that it satisfies.
7. In any situation in which it is not clear in which capacity you are responding, you are to designate all relevant capacities.
8. The relevant time period for these requests is January 1, 2008 through the present.

ATTACHMENT "A"

1. An organizational chart for Trump University, LLC.
2. Documents evidencing the contractual relationship with all licensees, affiliates, subsidiaries, sponsors, partnerships, corporations, or any other individual or entity that operates or with whom you do business or coordinate to do business in Texas.
3. All promotional material, used or available in Texas during the relevant time period including television, newspaper, magazine, and internet ads, flyers, brochures, signs, postcards, letters, notices, emails, and websites.
4. All workshop or mentoring program training material created, used or intended for use by you in Texas during the relevant time period. Include materials aimed at:
 - a) Selling the programs to the attendees;
 - b) Signing up the attendees for the programs;
 - c) Sales techniques of your staff for selling the programs to the attendees;
 - d) Profit or projections of profit discussed in the workshop;
 - e) Talking points and sales scripts; and
 - f) Testimonials used at the workshop.
5. A complete copy of all materials used or distributed in any workshop, including all slide presentations, worksheets, testimonials, transcripts, contracts and other materials.
6. A complete copy of all materials used or distributed during the mentoring program, including all worksheets, references, testimonials, transcripts, contracts and other materials.
7. A list of all Texas consumers who purchased your workshop or mentoring program during the relevant time period. Include their name, address and phone number, the amount paid, the date purchased, the dates they attended any workshops, and any evidence that such person successfully implemented your methods.
8. Any and all evidence of complaints or requests for refunds from Texas consumers, including evidence of any action taken by you related to or in response to such complaints or requests.
9. All assumed name certificates filed in any county in the State of Texas or with the Texas Secretary of State under which you conduct business.
10. Copies of all professional licenses and registrations held by you (or relied upon by you), your agents, your independent contractors, or your employees, including any held by Steven Goff.
11. All documents evidencing any continuing education (e.g. Texas Real Estate Commission Mandatory Continuing Education) credit offered in conjunction with your workshops, including applications, approvals, certifications, etc.

12. All documents related to any real estate contracts negotiated by a representative of yours, including but not limited to Steven Goff, on behalf of or in conjunction with your students.

If possible, please produce copies of documents responsive to this request in both hard copy and electronic format as available. Each page of the hard copy must be Bates labeled (or numbered consecutively).