

EXHIBIT 6

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STATE OF NEW YORK
OFFICE OF THE ATTORNEY GENERAL
ERIC T. SCHNEIDERMAN

-----x
IN THE MATTER OF THE INVESTIGATION OF
DONALD J. TRUMP FOUNDATION, INC.
-----x

October 4, 2017
10:14 a.m.

CONFIDENTIAL EXAMINATION of ALLEN
WEISSELBERG, held at the offices of The New York
State Office of the Attorney General, located at
120 Broadway, 3rd Floor, New York, New York
10271, before Anthony Giarro, a Registered
Professional Reporter and a Notary Public of the
State of New York.

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2 Q Do you recall discussing
3 with Mr. Trump anything concerning the
4 operation of the Donald J. Trump
5 Foundation?

6 A Sir, can you clarify? When
7 you say "operation," what do you mean?

8 Q I mean broadly, anything
9 that the Trump Foundation was doing.

10 A Well, years ago, it was a
11 very simple operation going on there, an
12 occasional request for a contribution
13 would be made and a check would be
14 issued. That was really the extent of
15 the operation. There wasn't much more
16 than that.

17 So I don't recall having a
18 conversation beyond maybe just a check
19 being issued, a check being signed and a
20 check being sent out.

21 Q Did you ever play any role
22 either in making a decision or discussing
23 any of the grants that the Trump
24 Foundation made?

25 A No.

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2 Char 500s?

3 A I did not review them here,
4 no.

5 Q So you would look at the
6 Char 500, the cover page, sign it?

7 A Sign and return it. That
8 was it.

9 Q Did you discuss the return
10 at all with Mr. Trump, either before or
11 after he signed it but around the time
12 you received it?

13 A I did not.

14 Q And is it your testimony
15 that it's your understanding that at
16 least for the last 10 or 15 years, you
17 did not understand that you were on the
18 board of directors of the Trump
19 Foundation?

20 A I did not.

21 Q During that time period, the
22 last 10 or 15 years, you did not attend
23 any meeting of the board of directors?

24 A I did not.

25 Q Aside from whether you

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2 attended or not, do you know if -- strike
3 that.

4 To your knowledge, did the
5 board of directors of the Trump
6 Foundation meet?

7 A Well, it was an informal --
8 we're all in the same corporate office.
9 It isn't like they're all scattered
10 around the country and they come together
11 for a meeting. And there may have been
12 discussions of people. But I wasn't
13 there for those discussions. But it
14 could have been informal.

15 Q Yeah. I'm not asking you to
16 speculate whether or not, just --

17 A Okay. I did not attend.

18 Q -- whether you know.

19 A I do not know.

20 Q Do you know who the
21 directors of the Trump Foundation are?

22 A Currently?

23 Q During the past 15 years, do
24 you know who they were?

25 A Well, based on the first

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2 MR. SHIFFMAN: Actually, I
3 showed him the document in 2013 for a
4 different reason. I was asking him
5 about a directorship all along, not
6 whether he was a director only in
7 2013. After he didn't recall, I went
8 to that document.

9 But let's not get into
10 arguments here over the facts. And
11 the witness will testify as to his
12 knowledge. And we can talk about the
13 facts and what they are later and
14 what our arguments from those facts
15 are later.

16 Q Was Ms. Foerderer succeeded
17 by a Ms. Rhona Graff?

18 A Correct.

19 Q Do you know if Ms. Graff was
20 ever on the board of directors of the
21 Trump Foundation?

22 A I don't believe so.

23 Q Do you recall ever
24 discussing with Mr. Trump or any of his
25 children whether or not the Trump

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1
2 Foundation would participate in the
3 veterans' fundraiser that was held in
4 January of 2016?

5 A So I can tell you what I do
6 know. There was a time. I think it was
7 in January of 2016. And there was some
8 issue -- I got a phone call that late
9 morning that there's a possibility I
10 might have to go to Iowa that evening. I
11 actually had a dental appointment. I had
12 to rush and get through it in order to be
13 able to go. And I wanted to know why I
14 was going to Iowa. I had never gone
15 anywhere with Donald on any kind of --
16 anything. He said it's possible that we
17 could have a fundraiser. We may have to
18 write some checks that night. I thought
19 somebody from our accounting department
20 should go. So I thought you'd might like
21 to go. I said okay. And I asked Jeff
22 McConney if he'd like to go with me. And
23 he said sure. So he grabbed the
24 checkbook. And later, we flew to Des
25 Moines, Iowa.

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2 Q What day are you talking
3 about? Is it the same day of the
4 fundraiser?

5 A Yes. It all happened that
6 same day.

7 Q And who did you receive the
8 phone call from that you just described?

9 A I don't recall.

10 Q Was it from Mr. Trump
11 himself?

12 A Again, I don't recall. It
13 could have been Rhona through Mr. Trump.
14 I just don't recall.

15 Q Could it have been somebody
16 from the Trump campaign?

17 A Could have been. I don't
18 recall.

19 Q What do you recall about
20 being told about the need to bring the
21 checkbook?

22 A If there was going to be any
23 checks that had to be issued for some
24 reason, we should have a checkbook with
25 us, in case there was any money being

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2 collected, which I thought was -- it
3 doesn't matter what I thought. He's my
4 boss. I went.

5 Q So you were told that
6 Mr. Trump was the one who instigated this
7 request, whether or not he was the one
8 relaying the request to you?

9 A Sorry. Say that one more
10 time.

11 Q I could rephrase it.
12 It's your understanding that
13 Mr. Trump was the one who was making the
14 request, even if he was not the person
15 communicating the request to you; is that
16 fair to say?

17 A I don't know where it was
18 from. It could have been anybody. I
19 don't know. You're asking me to guess at
20 something I don't know the answer to.

21 Q The reason why I asked it
22 that way, I think you said he's my boss.
23 If he wanted me to go, I would go.

24 A Yeah. I didn't want some
25 clerk somewhere telling me to go to Iowa

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2 Q You don't recall, one way or
3 another?

4 A I recall what I assumed was
5 going to happen. I didn't know if it was
6 actually going to happen or not.

7 Q Putting aside that first day
8 when you're preparing to go out to the --

9 A It was the only day.

10 Q It was the only day that you
11 went to Iowa?

12 A Correct.

13 Q But my question is: Putting
14 aside what you heard on that first day
15 there, did anybody ever tell you that the
16 Foundation was going to be involved in
17 the fundraiser or the distribution of
18 funds raised at the fundraiser?

19 A I don't recall. What I do
20 recall, though, is somebody was trying
21 to -- I think Jeff McConney was involved
22 in trying to create a Web site with
23 another individual in order to be able to
24 receive contributions that would go to
25 veteran groups. And I believe the

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2 Foundation was going to be used and
3 mentioned in that Web site.

4 Q Do you recall when
5 Mr. McConney was working with another
6 individual to set up the Web site?

7 A Well, it couldn't have been
8 the time we were flying to Iowa. I don't
9 recall which one.

10 Q You don't recall if it was
11 before or after the fundraiser?

12 A Correct.

13 Q Do you recall who he was
14 working with?

15 A A fellow, the last name
16 begins with -- Brad Pascal or something
17 like that. I don't recall the exact
18 spelling of his name.

19 Q And he was an independent
20 contractor?

21 A Independent contractor,
22 yeah.

23 Q Do you know who retained
24 Mr. Pascal or his company?

25 A I don't.

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2 Q Mr. McConney reported to
3 you; right?

4 A Correct.

5 Q Did you assign Mr. McConney
6 to work on the creation of the Web site?7 A I did. Well, to work with
8 the person who was going to create the
9 Web site, yes.10 Q And do you recall when you
11 did that -- putting aside when he
12 actually worked on it, do you recall when
13 you assigned him to work on that?14 A Do you want an exact time
15 when we started to do that?

16 Q As best as you can recall.

17 A I don't recall. I knew he
18 wanted to do it quickly because it was
19 going to happen fast. So it may have
20 been upon the return immediately from
21 Iowa, once we knew that we knew -- once
22 we knew it was going to be a fundraiser,
23 it happened.24 So now we had to get going
25 and get this thing started so the money

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2 A I didn't.

3 Q Did anybody ever tell you
4 you were needed there?

5 A Nope.

6 Q Did you play any role in --
7 strike that. I'll go back a second.

8 When you asked Mr. McConney
9 to assist in the preparation of the Web
10 site with this contractor, Mr. Pascal,
11 what did you tell him the Web site needed
12 to have?

13 A I didn't tell him anything.

14 Q Did you tell him who he
15 should get information from on the Trump
16 Foundation side?

17 A I gave him no instructions
18 at all other than to work with this
19 individual to get the Web site off the
20 ground.

21 Q And how did you know that a
22 Web site needed to be set up?

23 A I was told that. I don't
24 recall who told him, that a site was
25 needed in order to have the money flow

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2 through it.

3 Q You don't recall who told
4 you that?

5 A I don't.

6 Q Do you recall which
7 organization, the person who told you
8 that was affiliated with?

9 A I'm sorry. Can you repeat
10 the question?

11 Q So somebody told you that
12 you needed to get a Web site set up and
13 you don't recall who it was?

14 A Correct.

15 Q Do you recall if the person
16 who told you that was affiliated with the
17 Trump Organization, with the Trump
18 campaign or something else?

19 A I don't. I don't recall
20 that.

21 Q Do you recall if it was
22 Mr. Trump himself, Donald Trump?

23 A No. It was definitely not
24 Mr. Trump.

25 Q So it was somebody working

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2 A Correct.

3 Q He was an employee or worked
4 on the Trump campaign; right?

5 A He worked on the campaign,
6 correct.

7 Q You said he was just an
8 administrator with respect to the
9 veterans' fundraiser; right?

10 A Yeah. It's just --

11 Q It's just a yes-or-no
12 question.

13 MR. SITARCHUK: No. He's
14 going to answer the question the way
15 he sees fit.

16 A Yeah. Corery Lewandowski in
17 this particular situation, the way I
18 perceived him, this was not a campaign
19 issue. This was purely a
20 fundraising-type issue. And he was -- he
21 was working with us on being able to get
22 the information to us in order to be able
23 to dispense the funds out to the various
24 veteran organizations.

25 Q What is your understanding

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2 that that was what his role was limited
3 to based on?

4 A It's the only involvement I
5 had with him on this fundraiser. That
6 was it, just giving us information on
7 getting the funds out. He did nothing
8 else.

9 Q He just gave you
10 instructions on how to distribute the
11 funds; right?

12 A Not how to. Just to whom to
13 give it to.

14 Q Mr. Lewandowski is the one
15 telling you and your organization how to
16 distribute the funds from the veterans'
17 fundraiser; correct?

18 A He's telling us, here's a
19 list of organizations, let's get some
20 checks drawn, and let's get these folks
21 taken care of right away.

22 Q And you had no personal
23 knowledge of what he was doing in order
24 to come up with the lists and give you
25 those instructions, do you?

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2 it.

3 Q My question was just:
4 Mr. Trump was the only one authorized to
5 sign for the Foundation; right?

6 A Yes, correct.

7 Q And did you ever approve
8 checks before -- approve a check being
9 cut from the Foundation before Mr. Trump
10 signed it?

11 A No.

12 Q It was your staff who would
13 cut the checks and present them?

14 A Yeah. I wasn't involved in
15 the day-to-day operation of the process.

16 Q Were you involved in setting
17 any of the policies concerning how your
18 accounts payable staff would determine
19 which account to use for a particular
20 payment?

21 A Well, there really was no
22 policy. There was instructions. And it
23 was pretty simplistic, I must say. If a
24 charity was a 501(c)(3) charity and their
25 name appeared in an IRS publication that

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2 we had at the time, if they were in
3 there, then a check would be issued to
4 the charity from the Foundation.

5 If that name did not appear
6 in there, no check could be issued from
7 the Foundation. It would have to come
8 from Mr. Trump or not come at all.

9 Q So was there a policy in
10 place that if the --

11 A There's no policy, just so
12 you understand.

13 Q Then I'm sorry. What did
14 you say? Instructions?

15 A General instructions. That
16 was really the only instruction we ever
17 gave our accounts payable department.
18 They had to check that book first. If
19 they didn't qualify based on that book,
20 no check would come out of the
21 Foundation.

22 Q Did you give an instruction
23 to your accounts payable staff that if
24 the recipient was a 501(c)(3) charity,
25 that the Trump Foundation should be the

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2 payor?

3 A If the -- if there was a
4 piece of paper from a charity, requesting
5 a payment that was okayed by someone,
6 Donald or someone else that had
7 authority, the first thing, Deborah
8 Tarasoff, our accounts payable person,
9 would do is go to that publication. If
10 that institution was not in that book,
11 she was not allowed to write a check from
12 the Foundation.

13 Q My question is a different
14 one.

15 If the recipient charity was
16 in that book and was a 501(c)(3)
17 charity --

18 A Okay.

19 Q -- would the Trump
20 Foundation be the one pursuant to your
21 department's instructions to make the
22 check to that charity?

23 A Correct.

24 Q And was there any
25 instruction to determine whether the

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2 purpose of the payment related to the
3 business of the Trump Foundation?

4 A That was not -- no. As long
5 as the name was in the book, a check was
6 issued from the Foundation, yes.

7 MR. SITARCHUK: Could we
8 take a quick break?

9 MR. SHIFFMAN: Sure. It's
10 about eleven o'clock. Why don't we
11 take five or ten minutes.

12 (A short recess was taken.)

13 MR. SHIFFMAN: Let's go back
14 on the record.

15 Let's mark as the next
16 exhibit a document that's three pages
17 long. And it's what's called a Char
18 410-A from October 20th, 2016.

19 (The above-referred-to
20 document was marked as AW Exhibit 3
21 for identification, as of this date.)

22 Q Do you recognize the
23 document that we've marked as Exhibit 3?

24 A Yes.

25 Q And is that your signature

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2 Q Do you know if the Trump
3 Foundation has an investment policy?

4 A We do not.

5 Q Do you know what the
6 return -- strike that.

7 Where are the assets in the
8 Trump Foundation held?

9 A Specific cash? What type of
10 assets are you referring to?

11 Q What assets does it have?

12 A Well, cash that would have
13 been put into an operating account to pay
14 out to various charities. If we had some
15 excess funds, it may have been put into a
16 money market account to get some small
17 interest on the money.

18 Q Do you know who determined
19 where the assets in the Trump Foundation
20 would be held?

21 A No. We open a money market
22 account at a local bank, and money was
23 put there.

24 Q And who made that decision?

25 A It may have been Jeff

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2 McConney, or it could have been me. It
3 was, you know, ministerial. It wasn't
4 any real study that we did.

5 Q The Trump Foundation had
6 over a million dollars of assets usually
7 in its accounts; right?

8 A Not always.

9 Q Often?

10 A At times.

11 Q Let's take a look at
12 Exhibit 2, for example. Let's take a
13 look at that, if you take a look at
14 page 9 under the exhibit.

15 A Okay.

16 MR. SITARCHUK: I can't tell
17 if that's page 9.

18 A What did that say?

19 Q It's under Roman Numeral X.
20 This is for the return for 2013.

21 A Okay.

22 Q The average monthly cash
23 balance was \$1.5 million, a little bit
24 over that; right?

25 A In this particular year.

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2 Q Was that an unusually large
3 amount of cash in the account?

4 A I mean going back to the
5 initial -- the opening of the Foundation
6 many years ago, we didn't always have
7 large balances like that. Over the
8 years, it grew. And money was expended,
9 so on and so forth.

10 Q Who made the decision where
11 to keep that \$1.5 million? Was it you or
12 Mr. McConney?

13 A Yes.

14 Q But you were not a director
15 of the Trump Foundation at that time, to
16 your knowledge; right?

17 A Correct.

18 Q As the treasurer, were you
19 responsible for determining where the
20 Foundation's assets would be held?

21 A It was held in a bank, FDIC
22 insured.

23 Q My question was a little
24 different, not where was it held.

25 Was it part of your

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2 responsibilities as treasurer to decide
3 where it would be held?

4 A My responsibilities are
5 really outlined carefully. So I did what
6 I would normally do for any one of our
7 companies: Keep the money relatively
8 liquid in a safe place.

9 Q Did you think it was a
10 reasonable investment to keep
11 \$1.5 million at a bank as opposed to
12 getting something that would have a
13 higher return?

14 A There was no risk.

15 Q The Foundation had to give
16 out a certain amount of money each year,
17 didn't it?

18 A I'm not aware of it.

19 Q You're not aware of what the
20 regulations governing foundations are?

21 A I'm not aware of the
22 regulations regarding giving out specific
23 amounts of money.

24 Q Do you see on this page,
25 there's a reference in line 6 of the

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2 section we were just looking at, line
3 No. 6 that has the minimum investment
4 return? It has a 5 percent number.

5 A Okay.

6 Q Do you see that says about
7 74,000 was the minimum investment return
8 there. And then there's a reference to
9 the distributable amount.

10 Does that refresh your
11 recollection at all that there was a
12 requirement concerning how much the
13 Foundation had to give out?

14 A No.

15 Q Do you see on page 1 of the
16 990, so it's the third page of this
17 document, that the actual investment
18 return here was just over \$4,000? Line 3
19 of Part 1.

20 A I see it now, yes.

21 Q Do you think that was a
22 reasonable return on the \$1.5 million
23 that the Trump Foundation held?

24 A Are you asking for an
25 opinion?

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2 Q I'm asking, yes, whether you
3 thought it was a reasonable return on the
4 \$1.5 million of assets held.

5 A I think we could have done
6 more with more risk.

7 Q Could you have done more
8 without assuming undue risk?

9 A No. I mean in order to get
10 a 5 percent return, we'd have to go
11 toward the kind of investments which we
12 didn't choose to do.

13 Q Did you discuss with
14 Mr. Trump or his children whether the
15 assets should be invested in any manner
16 other than in a bank account or money
17 market?

18 A I did not.

19 Q Are you familiar with the
20 \$25,000 payment that the Trump Foundation
21 made to And Justice For All in or about
22 September of 2013?

23 A I'm familiar with it.

24 Q And how did you learn about
25 that payment?

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2 Q The entity that was not
3 shown on the return for 2013, which is in
4 the exhibit we marked as Exhibit 2, is a
5 different entity than the entity that was
6 referred to in Ms. Tarasoff's files;
7 right?

8 A Correct.

9 Q So there's three different
10 entities we have; right?

11 A It's called The Perfect
12 Storm.

13 Q Is that right?

14 A Three different entities,
15 correct. Well, two are the same name;
16 one with a different name, yes.

17 Q The one with the different
18 name is the one that's in the return for
19 the Donald Trump Foundation for 2013;
20 right?

21 A Correct.

22 Q And that one is listed as
23 Justice For All; right?

24 A Justice For All.

25 Q Do you know how that error

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2 occurred?

3 A I wish I could answer. The
4 answer is no.5 Q Did you speak with the
6 accountants for the Donald Trump
7 Foundation in order to prepare your
8 letter or to assist in the preparation of
9 the letter from June 28th, 2016?10 A Yes. We went back to find
11 out -- actually, before that, back in
12 March of 2016 when this whole thing first
13 came up, we went back to the return to
14 look at what was on the return. And I
15 asked Jeff McConney at that time, where
16 did this come from. You did not give
17 that information to the accounting firm.
18 They may have made a mistake and left off
19 the And and just put a Justice For All
20 because we didn't give that information
21 to them.22 Q What information did you
23 give to the accountants?24 A I believe what Jeff normally
25 gives them is a general ledger with a

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2 saw the second and third page in any
3 form?

4 A Not before --

5 Q Not before preparing for
6 this examination?

7 A Correct.

8 Q Do you know who -- I think
9 we talked about him before --
10 Mr. Lewandowski is?

11 A I do.

12 Q He was the campaign manager
13 for Trump's campaign for president;
14 right?

15 A Correct.

16 Q Who's Stuart Jolly? Do you
17 know him?

18 A No, I don't.

19 Q Have you ever corresponded
20 with him?

21 A I don't recall, no.

22 Q Do you recall that
23 Mr. Lewandowski sent a list of charities
24 that were to be recipients of grants from
25 the veterans' fundraiser?

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2 A Yeah. Now that I see this,
3 clearly, Mr. Trump had approved every
4 contribution that was going out to a
5 veteran group. He clearly was the one
6 directing where the money was going. A
7 list was I guess prepared. And Mr. Trump
8 approved every payment that was going out
9 to the veterans groups.

10 Q And that's not what I asked
11 you.

12 How do you know that
13 Mr. Trump approved every payment that
14 went out to the veterans groups?

15 A I said based on what I'm
16 reading, that he has approved this list.

17 Q But you don't have personal
18 knowledge that he approved every payment
19 that went out to the veteran groups or do
20 you?

21 A Well, I mean I did hear
22 around the office that he was clearly
23 involved, making sure these groups got
24 their money. And he was definitely
25 involved in the entire process of getting

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2 A Do I know who spoke to
3 Mr. Trump to get it approved?

4 Q Yes.

5 A I don't know.

6 MR. SHIFFMAN: Let's mark
7 the next exhibit in order. It's a
8 document Bates Stamped DJTF-VETS378
9 through 380. And it's a
10 January 29th, 2016 e-mail from
11 Mr. Weisselberg to Mr. Lewandowski.

12 (The above-referred-to
13 document was marked as AW Exhibit 9
14 for identification, as of this date.)

15 A I'm just going to read
16 through it if you don't mind.

17 Q Sure, and just tell me when
18 you're ready.

19 A Okay.

20 Q This is an e-mail chain
21 between you and Mr. Lewandowski; correct?

22 A Yes.

23 Q And at the time,
24 Mr. Lewandowski was campaign manager for
25 Mr. Trump; correct?

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2 A Correct.

3 Q At this time, weren't you
4 seeking direction from Mr. Lewandowski on
5 how he wanted to distribute the proceeds
6 from the veterans' fundraiser?

7 A I was seeking direction,
8 whether he got it from Mr. Trump directly
9 and passed it on to me. I didn't care
10 how he got me the information. I just
11 needed the information in order to be
12 able to cut checks.

13 Q The first e-mail, which is
14 the one on pages 379 to 380, is your
15 e-mail to Mr. Lewandowski from 10:28 in
16 the morning on the 29th; right?

17 A Correct.

18 Q There, you ask him -- you
19 state, "We should start thinking how you
20 want to distribute the funds collected
21 for the vets"; right?

22 A Yeah. The general you, not
23 specifically Mr. Lewandowski.

24 Q Did you refer to anyone else
25 in your e-mail?

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2 A Truthfully, I really wasn't
3 focused on anything of that nature.4 Q You didn't understand
5 Mr. Lewandowski to be referring to making
6 disbursements at campaign events in
7 advance of the Iowa caucus when he wrote
8 that e-mail to you?9 A I knew they were going to be
10 in Iowa. And he wanted some checks with
11 him when he went there.

12 Q Did he tell you that?

13 A No. That's from what I'm
14 reading here.15 Q So Mr. Lewandowski wanted
16 some checks when he was in Iowa?17 A Based on what I'm reading
18 here, yes.19 Q They were in Iowa
20 campaigning for the primary that was
21 going to be held on February 1st;
22 correct?23 A I don't know. I had nothing
24 to do with the political side of
25 anything. I just wanted to get checks

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1
2 prepared. Whenever they wanted them, I
3 wanted to be ready to have those checks
4 for them, whatever date it may have been.
5 It didn't matter what day of the week it
6 was.

7 Q Mr. Weisselberg, you then
8 write back to Mr. Lewandowski shortly
9 after he asks you about making the
10 disbursements while in Iowa. You say,
11 "You can use Donald's \$1 million at this
12 time."

13 What did you mean by
14 Donald's 1 million?

15 A He was going to contribute a
16 million dollars of his own money into the
17 Foundation. And that clearly is a number
18 that I could work with because I know the
19 amount. So if you want to make out
20 checks from that number, I could do that.
21 It's a very definite number.

22 The other moneys, I didn't
23 have access to. So if he wanted some
24 checks to be written, I could do that.
25 But we have to use a million dollars that

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2 Mr. Lewandowski to you.

3 (The above-referred-to
4 document was marked as AW Exhibit 17
5 for identification, as of this date.)

6 A Okay.

7 Q Is this an e-mail you
8 received?

9 A Yes.

10 Q Do you recall discussing
11 this e-mail with anybody?

12 A So many conversations, I
13 don't recall.

14 Q Do you recall if you cut a
15 check for this \$100,000 that's being
16 requested?

17 A Based on what I'm reading
18 it, it says we withdraw a check, we'll
19 cut a check. I'm assuming we did. I
20 don't know.

21 MR. SHIFFMAN: Let's mark as
22 the next document, a document Bates
23 Stamped DJTF-VETS206 through 209.

24 (The above-referred-to
25 document was marked as AW Exhibit 18

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2 A I don't recall.

3 MR. SHIFFMAN: We'll mark
4 another document, a one-page e-mail.
5 This one is from Mr. McConney to
6 Mr. Lewandowski, dated February 16th,
7 2016.

8 (The above-referred-to
9 document was marked as AW Exhibit 19
10 for identification, as of this date.)

11 A Okay.

12 Q This is an e-mail you
13 received; correct?

14 A I was copied on it.

15 Q In this e-mail, Mr. McConney
16 is asking Mr. Lewandowski for a list of
17 veterans' charities that he wants funds
18 sent to and how much have you sent to
19 each charity. Do you see that?

20 A I do see that.

21 Q And this is after that
22 earlier e-mail that we looked at that had
23 the list of the approved charities;
24 right?

25 A Okay.

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2 A Yes.

3 Q Who is he?

4 A He's a fellow who used to
5 work for us many years ago. And then he
6 worked on the campaign.

7 Q Did you have any
8 conversations with him about this
9 request?

10 A Not that I recall.

11 MR. SHIFFMAN: The next
12 exhibit will be a document Bates
13 Stamped DJTF-VETS196 through 202.

14 (The above-referred-to
15 document was marked as AW Exhibit 23
16 for identification, as of this date.)

17 Q Why don't you just let me
18 know when you're ready.

19 A Okay.

20 Q Did you receive any of the
21 e-mails in this e-mail chain? And if so,
22 which ones?

23 A I'm CC'd on an e-mail.

24 Q Which page? You could use
25 the numbers at the bottom of the page.

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2 A Three.

3 Q So that's the one with
4 DJTF-VETS198 on it at the bottom?

5 A Yes, 198.

6 Q So that one is CC'd, as well
7 as the three preceding e-mails,
8 chronologically, so going back towards
9 page 199, 200.

10 A I haven't gotten there yet.
11 Yes. 199, my name's on there. And 200,
12 my name is on there as well. That's it.

13 Q The e-mail on page 197
14 doesn't indicate who received it.

15 Do you know, one way or
16 another, whether you received the e-mails
17 on 197? I'm talking about the one at the
18 bottom of the page where it's from Jeff
19 McConney. But we don't know who it's to.
20 And there's another one from Larry Glick
21 too. That's the same thing.

22 A This was -- this e-mail
23 you're referring to now, is that the one
24 sent from my iPhone?

25 Q The ones that are from the

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1
2 Q Does the fact that Ms. Burr
3 and Mr. Lewandowski, who were on the
4 campaign, were part of the people keeping
5 track of the organizations and
6 communicating about the organizations
7 receiving grants, refresh your
8 recollection that the campaign was more
9 than merely a conduit to Mr. Trump
10 concerning how the donations would be
11 made?

12 A Yeah. I think that Corey --
13 and she may just be a record keeper,
14 helping Corey out because he was being
15 given responsibility as the administrator
16 to make sure these funds got to where
17 they had to get to in an administrative
18 role where Rhona would have done that if
19 it was an organizational-type situation.
20 And Campbell may have just been helping
21 along. Corey, he had no assistance from
22 us to help him.

23 Q Mr. Lewandowski had no role
24 in the Foundation; right?

25 A Correct.