

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

PEOPLE OF THE STATE OF NEW YORK, BY
LETITIA JAMES, Attorney General of the State of
New York,

Plaintiff,

vs.

DONALD J. TRUMP, DONALD TRUMP, JR., ERIC
TRUMP, IVANKA TRUMP, ALLEN
WEISSELBERG, JEFFREY MCCONNEY, THE
DONALD J. TRUMP REVOCABLE TRUST, THE
TRUMP ORGANIZATION, INC., TRUMP
ORGANIZATION LLC, DJT HOLDINGS LLC, DJT
HOLDINGS MANAGING MEMBER, TRUMP
ENDEAVOR 12 LLC, 401 NORTH WABASH
VENTURE LLC, TRUMP OLD POST OFFICE LLC,
40 WALL STREET LLC, and SEVEN SPRINGS
LLC,

Defendants.

Index No. 452564/2022

**AFFIRMATION OF
CLIFFORD S. ROBERT
IN SUPPORT OF MOTION
TO DISMISS COMPLAINT**

CLIFFORD S. ROBERT, an attorney duly admitted to practice law before the Courts of the State of New York, hereby affirms the following statements to be true under the penalties of perjury:

1. I am the principal of the law firm of Robert & Robert PLLC, attorneys for defendants DONALD TRUMP, JR. and ERIC TRUMP in the above-referenced matter. I am fully familiar with the facts and circumstances set forth herein based on the files and materials maintained by my firm.

2. This Affirmation is submitted in support the within Motion for an Order: (a) pursuant to CPLR 3211(a)(1), (2), (3), (5) and (7), dismissing the Complaint of plaintiff PEOPLE OF THE STATE OF NEW YORK, BY LETITIA JAMES, Attorney General of the State of New

York (“Plaintiff”) ([NYSCEF No. 1](#)) (“Complaint”), in its entirety and with prejudice; and (b) granting all such other and further relief as this Court may deem just, equitable and proper.

3. Annexed hereto as Exhibit A is a true and correct copy of the Complaint, with Exhibits 1 through 24 (NYSCEF Nos. 3-26).

WHEREFORE, it is respectfully requested that the Court dismiss Plaintiff’s Complaint in its entirety and with prejudice.

Dated: Uniondale, New York
November 21, 2022

Clifford S. Robert
CLIFFORD S. ROBERT

CERTIFICATION

Pursuant to Rule 202.8-b of the Uniform Civil Rules for the Supreme Court & the County Court, I certify that, excluding the caption, signature block, and this certification, the foregoing Affirmation contains 196 words. The foregoing word counts were calculated using Microsoft® Word®.

Dated: Uniondale, New York
November 21, 2022

Respectfully submitted,

Clifford S. Robert
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