

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

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: THE PEOPLE OF THE STATE OF NEW :  
YORK, :

- against -

DONALD J. TRUMP,

:

Defendant. :::

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Index No. 71543-23

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: SUBPOENA DUCES TECUM

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IN THE NAME OF THE PEOPLE OF THE STATE OF NEW YORK

To: Michael D. Cohen

**Greetings:**

**YOU ARE HERBEY COMMANDED**, that all business and excuses being  
laid aside, to produce, at the Supreme Court of the State of New York, of the County  
of New York, Part 59, 100 Centre Street, New York N.Y., 10013, on or before  
November 10, 2023, at 10:00 a.m., all documents and communications regarding the  
topics below that are stored on any medium under your possession or control,  
including but not limited to phones (including encrypted messaging applications),  
tablets, computers, and hard copy:

1. For the period January 1, 2017, to the present, all communications, or  
documents memorializing or otherwise referencing such communications,

including any transcripts, notes, emails, texts, or tapes, between you and current or former prosecutors or other staff of: the Manhattan District Attorney's Office, including former ADA Mark Pomerantz and Detective Jeremy Rosenberg; the U.S. Attorney's Office for the Southern District of New York; the Federal Bureau of Investigation; and the New York Attorney General's Office; regarding or relating to Donald J. Trump, Melania Trump, the Trump Organization, Stephanie Clifford, or alleged "catch-and-kill" or hush money payment schemes;

2. For the period January 1, 2017, to June 1, 2018, all documents and communications regarding or relating to any legal or non-legal work done on behalf of Donald J. Trump or Melania Trump, including any press appearances or statements.
3. All documents or communications regarding or relating to Stephanie Clifford, or alleged "catch-and-kill" or hush money payment schemes;
4. For the period January 1, 2015 to the present, documents sufficient to identify all clients that have retained you (*i.e.*, in your individual capacity or as a member of any firm), or Michael D. Cohen & Associates, PC, or Essential Consultants LLC, including payments you received, and documents sufficient to demonstrate whether you entered into retainer agreements with each client, including copies of all retainer agreements between you and any client;



5. For the period January 1, 2017 to June 1, 2018, documents sufficient to demonstrate all statements made by you, or on your behalf, to any media outlet concerning the lawfulness of payments made to Stephanie Clifford;
6. For tax years 2016, 2017 and 2018, all documents and communications relating to any tax liabilities—state or federal—owed by you or by any entity in which you hold or held, directly or indirectly, an ownership interest, including all federal and state tax returns you filed (including amended tax returns), all draft tax returns, all documents related to income calculations or deductions from income, all communications with accountants, and all accountant work papers;
7. Documents sufficient to show which accountants prepared and filed your tax returns for the tax years 2016, 2017, and 2018;
8. All draft manuscripts for the books *Disloyal* and *Revenge*; and
9. Your contract with the publisher for the books *Disloyal* and *Revenge*, as well as documents sufficient to show the compensation you received from the books *Disloyal* and *Revenge*, and from the podcast *Mea Culpa*.

**Your failure to comply with this subpoena is punishable as a contempt of court.**

October 17, 2023

NECHELES LAW LLP

*/s/ Susan Necheles*

By: \_\_\_\_\_

Susan R. Necheles

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