

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

THE PEOPLE OF THE STATE OF NEW YORK,

- against -

DONALD J. TRUMP,

Defendant.

Index No. 71543-23

**AFFIRMATION OF TODD  
BLANCHE IN SUPPORT OF  
PRESIDENT DONALD J.  
TRUMP'S OMNIBUS  
MOTIONS**

Todd Blanche, a partner at the law firm Blanche Law PLLC, duly admitted to practice in the courts of the State of New York, hereby affirms the following to be true under penalties of perjury:

1. I represent President Donald J. Trump in this matter and submit this affirmation in support of President Trump's Omnibus Motions to inspect the grand jury minutes and, upon such inspection, to dismiss the indictment, grant a bill of particulars, strike the People's certificate of compliance, and grant related relief.

2. I have read the factual representations contained in the accompanying Memorandum of Law in Support of President Trump's Omnibus Motions, and those representations are true or I believe to be true.

3. The representations and statements are made upon personal knowledge, or upon information and belief, the source of my knowledge being a review of documents in the Court file in this case, a review of the documents provided to the defense by the People, and the defense investigation in this matter.

4. Attached as Exhibit 1 is a true and accurate copy of the grand jury subpoena issued to the Trump Organization on August 1, 2019.

5. Attached as Exhibit 2 is a true and accurate copy of [REDACTED] January 27, 2017 email, as provided to the defense by the People.

6. Attached as Exhibit 3 is a true and accurate copy of President Trump's request for a bill of particulars on April 27, 2023, and the People's response on May 12, 2023.

7. Attached as Exhibit 4 is a true and accurate copy of Addendum A to the People's July 24, 2023 Automatic Discovery Form.

Dated: September 29, 2023  
New York, N.Y.

By: /s/ Todd Blanche  
Todd Blanche  
Blanche Law PLLC  
99 Wall Street, Suite 4460  
New York NY 10005  
212-716-1250  
toddblanchelaw.com

# EXHIBIT 1



CYRUS R. VANCE, JR.  
DISTRICT ATTORNEY

DISTRICT ATTORNEY  
OF THE  
COUNTY OF NEW YORK  
ONE HOGAN PLACE  
New York, N. Y. 10013  
(212) 335-9000

August 1, 2019

**VIA EMAIL ([marc.mukasey@mukaseylaw.com](mailto:marc.mukasey@mukaseylaw.com))**

The Trump Organization  
Attn: Custodian of Records  
727 Fifth Avenue  
New York, NY 10022

**Re: Investigation Number 2018-00403803**  
**Return Date: August 15, 2019**

To Whom It May Concern:

Enclosed please find a subpoena seeking records relating to the above-referenced investigation. These records are needed on or before August 15, 2019.

In lieu of appearing personally with the requested documents, you may email electronic copies to paralegal [REDACTED] ([kennyd@dany.nyc.gov](mailto:kennyd@dany.nyc.gov)) or deliver CDs, DVDs, or USB 2.0 external hard drives to the New York County District Attorney's Office, 80 Centre Street, Major Economic Crimes Bureau, New York, NY 10013, for the attention of Assistant District Attorney Solomon Shinerock, c/o [REDACTED]. Please note that electronic copies are preferred.

To the extent that you withhold documents pursuant to a claim of privilege, please provide a log setting forth, as to each document, the legal basis for the claim of privilege, the type of document, its general subject matter, date, author, sender and recipient where applicable, and such other information as is sufficient to determine the claim of privilege.

If you have any problems or questions concerning the subpoena or the manner of delivery, please contact me at the number below. Your attention to this matter is greatly appreciated.

Sincerely,

Solomon Shinerock  
Assistant District Attorney  
[REDACTED]

Enc.

# SUBPOENA

(Duces Tecum)

FOR A WITNESS TO ATTEND THE

## GRAND JURY

In the Name of the People of the State of New York

To: Custodian of Records  
The Trump Organization

**YOU ARE COMMANDED** to appear before the **GRAND JURY** of the County of New York, at the Grand Jury Room 907, of the Criminal Courts Building at One Hogan Place, between Centre and Baxter streets, in the Borough of Manhattan of the City, County and State of New York, on August 15, 2019 at 2:00 p.m. of the same day, **as a witness in a criminal proceeding:**

Investigation into the Business and Affairs of John Doe (2018-00403803),

**AND**, YOU ARE DIRECTED TO BRING WITH YOU AND PRODUCE AT THE TIME AND PLACE AFORESAID, THE FOLLOWING ITEMS IN YOUR CUSTODY:



SEE EXHIBIT A – ATTACHED



**IF YOU FAIL TO ATTEND AND PRODUCE SAID ITEMS**, you may be adjudged guilty of a Criminal Contempt of Court, and liable to a fine of one thousand dollars and imprisonment for one year.

Dated in the County of New York,  
August 1, 2019

CYRUS R. VANCE, JR.  
District Attorney, New York County

By:

  
Solomon Shinerock  
Assistant District Attorney  


**Note:** In lieu of appearing personally with the requested documents, you may email electronic copies to paralegal @dany.nyc.gov) or deliver CDs, DVDs, or USB 2.0 external hard drives to the New York County District Attorney's Office, 80 Centre Street, Major Economic Crimes Bureau, New York, NY 10013, for the attention of Assistant District Attorney Solomon Shinerock, c/o 

Inv. Number: 2018-00403803

**EXHIBIT A TO SUBPOENA TO THE TRUMP ORGANIZATION**  
**DATED AUGUST 1, 2019**

ITEMS TO BE PRODUCED are those in the actual and constructive possession of the Trump Organization, its entities, agents, officers, employees and officials over which it has control, including without limitation its subsidiaries:

1. For the period of June 1, 2015, through September 20, 2018, any and all documents and communications that relate to, reference, concern, or reflect:
  - a. payments made for the benefit of or agreements concerning [REDACTED]
  - b. payments made for the benefit of or agreements concerning [REDACTED]  
[REDACTED]
  - c. payments made to or agreements with [REDACTED] or American Media, Inc. that concern [REDACTED] or [REDACTED]

including but not limited to documents and communications involving:

- Resolution Consultants LLC
- Essential Consultants LLC aka EC LLC
- Entities owned or controlled by [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- American Media, Inc.
- National Enquirer
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

The items sought by this demand include without limitation: emails, memoranda, and other communications; invoices; agreements, including without limitation retainer agreements; accounting and other book entries or backup documents; general ledger records; wire transfer requests and related records, check images, bank statements, and any other evidence of payments or installments; and organizational documents and agreements, including without limitation articles of incorporations, limited liability agreements, and minutes of director or member meetings.

2. For the period of June 1, 2015, through September 20, 2018, any and all documents and communications that relate to, reference, concern, or reflect [REDACTED] employment by or work on behalf of Donald Trump or the Trump Organization at any time, including without limitation:

invoices, payment records, human resource records, W2s, 1099s, emails, memoranda, and other communications.

3. For any responsive documents or communications withheld under a claim of privilege, please provide a log setting forth, as to each such document or communication, the legal basis for the claim of privilege, the type of document or communication, its general subject matter, date, author, sender and recipient where applicable, and such other information as is sufficient to determine the claim of privilege.

## DEFINITIONS AND INSTRUCTIONS

As used herein, unless otherwise indicated, the following terms shall have the meanings set forth below:

- A. The terms "relate," "reference," "concern," "reflect," "include," and "including without limitation," in whatever tense used, shall be construed as is necessary in each case to make the request to produce inclusive rather than exclusive, and are intended to convey, as appropriate in context, the concepts of comprising, respecting, referring to, embodying, evidencing, connected with, commenting on, concerning, responding to, showing, refuting, describing, analyzing, reflecting, presenting, and consisting of, constituting, mentioning, defining, involving, explaining, or pertaining to in any way, expressly or impliedly, to the matter called for.
- B. The words "and," "or," "any" and "all" shall be construed as is necessary in each case to make each request to produce inclusive rather than exclusive.
- C. Terms in the plural include the singular and terms in the singular include the plural. Terms in the male include the female and terms in the female include the male. Neutral gender terms include all.
- D. "Document" includes without limitation, any written, printed, typed, photocopied, photographic, recorded or otherwise created or reproduced communication or representation, whether comprised of letters, words, numbers, pictures, sounds or symbols, or any combination thereof, in the form maintained, having access to, constructively possessed, physically possessed, and controlled. This definition includes copies or duplicates of documents contemporaneously or subsequently created that have any non-conforming notes or other markings, and drafts, preliminary versions, and revisions of such. It includes, without limitation, correspondence, memoranda, notes, records, letters, envelopes, telegrams, faxes, messages, emails, voice mails, instant messenger services, studies, analyses, contracts, agreements, working papers, summaries, work papers, calendars, diaries, reports. It includes, without limitation, internal and external communications of any type. It includes without limitation documents in physical, electronic, audio, digital, video existence, and all data compilations from which the data sought can be obtained, including electronic and computer as well as by means of other storage systems, in the form maintained and in usable form.
- E. "Communication" includes every means of transmitting, receiving or recording transmission or receipt of facts, information, opinion, data, or thoughts by one person, and between one and more persons, entities, or things.

# EXHIBIT 2

Message

**From:** [REDACTED] [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=7322445B154D45BBA27F7955270967FF-[REDACTED]]  
**Sent:** 1/27/2017 10:40:30 AM  
**To:** Trump Main Office [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=8825aa2a3ae244ac84ec4bcec9f0a7be-Trump Main]  
**Subject:** "Says Who"  
**Flag:** Follow up

Dear All:

I cannot express how difficult it is for me to write this farewell e-mail. Ten years ago, when Mr. Trump offered me my position at the Trump Organization, I distinctly remember this indescribable feeling as I took my place in Ivanka's old office. As I am now cleaning out my office to embark on this new journey, that feeling has returned. This time, with a degree of sadness included.

Over these 10 years, we have shared as a company, as friends, as family so many joyous occasions together, and unfortunately, some sad ones as well.

I will be in and out of the office with my final day to say goodbye this Tuesday. We all know too well how the liberal media and anti-Trump advocacy groups intend on attacking our boss. It is for this reason that I am truly excited to begin my new position as Personal Attorney to President Donald J. Trump. It is an incredible honor for me and I look forward to productive and exciting times with President Trump. However, I will very much miss each and every one of you here at the Trump Organization and I would like to thank all of you for making my years here memorable ones. You have all been fantastic -- and I know you will continue to be so with Don and Eric.

If anyone should need me, or just to drop a note telling me how quiet the 26<sup>th</sup> floor is now that I am gone, I will be retaining my cellular number and effective Tuesday, my new e-mail address will be [REDACTED]

Yours,

**T R U M P**  
THE TRUMP ORGANIZATION

[REDACTED]  
Executive Vice President and  
Special Counsel To Donald J. Trump  
725 Fifth Avenue | New York, NY | 10022  
p. 212.836.3212 | f. 212.980.3821  
c. [REDACTED] | [trump.com](http://trump.com)

# EXHIBIT 3

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF NEW YORK: PART 59

THE PEOPLE OF THE STATE OF NEW YORK

-against-

DONALD J. TRUMP,

Defendant.

PEOPLE’S RESPONSE TO  
DEFENDANT DONALD J.  
TRUMP’S APRIL 27 REQUEST  
FOR A BILL OF PARTICULARS

Ind. No. 71543-23

Pursuant to CPL 200.95(2) and 200.95(4), the People provide the following response to defendant Donald J. Trump’s April 27, 2023 request for a bill of particulars, attached hereto as Exhibit 1.

**I. Legal standard.**

A bill of particulars specifies “items of factual information which are not recited in the indictment and which pertain to the offense charged . . . including the substance of each defendant’s conduct encompassed by the charge which the people intend to prove at trial on their direct case.” CPL 200.95(1)(a). “The sole function of a bill of particulars is to clarify . . . the indictment.” *People v. Elliott*, 299 A.D.2d 731, 732 (3d Dep’t 2002). A bill of particulars is not a statement of the prosecution’s legal theory or a discovery device. *See* CPL 200.95(1)(a) (limiting a bill of particulars to “items of factual information”); *People v. Davis*, 41 N.Y.2d 678, 680 (1977) (“A bill of particulars serves to clarify the pleading; it is not a discovery device.”).

To be entitled to a bill of particulars, a defendant must demonstrate that the requested information is “authorized to be included in a bill of particulars” and “necessary to

enable the defendant adequately to prepare or conduct his defense.” CPL 200.95(4); *see* CPL 200.95(1)(b), 200.95(5).

The People “are not required to list every action undertaken by the defendant in the course of the crime.” *People v. Kessler*, No. 11307/95, 1996 WL 903952, at \*3 (Sup. Ct. N.Y. Cty. Dec. 2, 1996); *see also People v. Iannone*, 45 N.Y.2d 589, 599 (1978) (“To require a listing of every action undertaken by the defendant in the course of this crime would serve no useful purpose, and would instead mark a step back towards the needless complexities of the common-law indictment.”); *People v. Rondon*, 67 Misc.3d 1228(A), at \*5 (Cty. Ct. Orange Cty. 2020) (denying the defendant’s “overly broad” request for “all factual information which is not recited in the indictment that pertains to each offense charged”). In addition, the People are not required to include “matters of evidence relating to how the people intend to prove the elements of the offense charged or how the people intend to prove any item of factual information included in the bill of particulars.” CPL 200.95(1)(a).

## **II. The People are already providing defendant with more information than a bill of particulars would require.**

Defendant has already received and will receive far more factual information than the People are required to provide in a bill of particulars, and has more than sufficient information to prepare his defense.

First, the facts set forth in the Indictment and the accompanying Statement of Facts provide all the particulars to which defendant is entitled because they provide “the substance of . . . defendant’s conduct encompassed by the charge[s] which the people intend to prove at trial on their direct case.” CPL 200.95(1)(a). The 15-page, 34-count Indictment and 13-page Statement of Facts fully inform defendant of the nature of the charges against him,

including by specifying the business records defendant allegedly falsified and by describing the details of his allegedly unlawful scheme. *See, e.g., People v. Morris*, 28 Misc.3d 1215(A), at \*48-49 (Sup. Ct. N.Y. Cty. July 29, 2010) (denying the defendant’s motion for a bill of particulars where, among other things, the indictment included a 17-page narrative of the allegedly unlawful scheme).

Second, as the People advised the Court and defendant at arraignment, the People are prepared to provide millions of pages of discovery to defendant pursuant to CPL Article 245 once defendant has been advised on the record of the terms and content of, and conduct prohibited by, the protective order entered by this Court on May 8, 2023. *See* Tr. of Apr. 4, 2023 Arraignment at 16-17 (describing the People’s intent to make rolling productions of discovery in several stages once a protective order is in place). That discovery will include grand jury minutes, grand jury exhibits, prior witness statements, financial documents, subpoena compliance, and extensive additional materials. The production of these voluminous discovery materials further ensures that defendant is fully informed of the charges against him so he may prepare a defense. *See, e.g., People v. Kyoung Ja Choi*, 259 A.D.2d 423, 424 (1st Dep’t 1999) (“The indictment together with the People’s response to defendant’s omnibus motion and discovery material provided to defendant gave adequate notice of the charges against her and the prosecution was not required to include evidentiary material in a bill of particulars.”); *Morris*, 28 Misc.3d 1215(A), at \*48-49 (denying motion for a bill of particulars and noting that where the People “turned over two million documents it had in its possession from its investigation into the defendants and their co-conspirators’ activities, . . . [the defendant] cannot in good faith complain that he needs a bill of particulars

in order to prepare for trial”); *see generally Iannone*, 45 N.Y.2d at 598 (“[T]he development of modern discovery rules in criminal cases has diminished the significance of the indictment’s function as a provider of information.” (citing CPL Article 240, which was replaced in 2020 by the more expansive CPL Article 245)).

Third, to the extent that defendant asks the People to identify specific pieces of evidence or preview the People’s legal strategy, defendant has failed to meet his burden of demonstrating that the requested information is “authorized to be included in a bill of particulars.” CPL 200.95(4); *see also* CPL 200.95(1)(b), 200.95(5); *Davis*, 41 N.Y.2d at 680.

### **III. Responses to defendant’s specific requests.**

The People’s further responses to each of defendant’s specific requests follow.

Request No. 1: “Describe the substance of Donald J. Trump’s conduct and specify as to each offense charged:”

People’s Response to Request No. 1: To the extent that Request No. 1 seeks factual information describing the substance of defendant’s conduct as to each offense charged, that factual information is contained in the Indictment and Statement of Facts, and will be contained in the discovery that the People will provide pursuant to CPL Article 245. Defendant is not entitled to any further information in response to this request. *See* CPL 200.95(1)(a).

To the extent that Request No. 1 is an attempt to incorporate Request Nos. 2, 3, and 4 into the request for information describing the substance of defendant’s conduct as to each offense charged, the People refer to the responses below.

Request No. 2: “Specify the criminal statute (i.e., ‘other crime’) which Donald J. Trump is alleged to have committed or intended to commit or to aid or conceal the commission thereof by means of the allegedly false business record; a. If the ‘other crime’ you are relying on is N.Y. Elec. Law § 17-152, please identify (i) what are the ‘unlawful means,’ and (ii) who are the other members of the alleged conspiracy. b. If the ‘other crime’ is a tax crime, identify the tax returns which were intended to be incorrect or false and specify the manner in which they were intended to be false or incorrect.”

People’s Response to Request No. 2: Defendant is not entitled to the information requested in Request No. 2. Where an intent to commit or conceal another crime is an element of an offense, the People need not prove intent to commit or conceal a particular crime; thus, the indictment need not identify any particular crime that the defendant intended to commit or conceal, and defendant is not entitled to such information in a bill of particulars. *See People v. Mackey*, 49 N.Y.2d 274, 277-79 (1980). Notwithstanding that defendant is not entitled to the requested information, and expressly without limiting the People’s theory at trial, *see People v. Barnes*, 50 N.Y.2d 375, 379 n.3 (1980); the People respond that the crimes defendant intended to commit or to aid or conceal may include violations of New York Election Law § 17-152; New York Tax Law §§ 1801(a)(3) and 1802; New York Penal Law §§ 175.05 and 175.10; or violations of the Federal Election Campaign Act, 52 U.S.C. § 30101 *et seq.*; and the People further refer defendant to certain facts, among others, set forth in the Statement of Facts relating to:

- an agreement to unlawfully suppress negative stories about defendant before an election in order to influence the outcome of the election (Statement of Facts ¶¶ 1-2, 7, 9-14, 17-21, 23);
- multiple false statements in the business records of different entities to advance that agreement, including but not limited to a series of false statements that both furthered the conspiracy and concealed earlier unlawful conduct and payments (Statement of Facts ¶¶ 2-4, 13, 26, 28-33);
- disguising reimbursement payments by doubling them and falsely characterizing them as income for tax reasons (Statement of Facts ¶¶ 2, 25); and
- multiple admissions of specific crimes by participants, including by guilty pleas to felonies (Statement of Facts ¶¶ 2-3, 7, 40, 42-44).

The factual information requested in Request Nos. 2(a)(i), 2(a)(ii), and 2(b) is contained in the Indictment and Statement of Facts, and will be contained in the discovery that the People will provide pursuant to CPL Article 245.

Request No. 3: “Identify the person or entity who Donald J. Trump is alleged to have intended to defraud by means of the allegedly false business record.”

People’s Response to Request No. 3: Defendant is not entitled to the information requested in Request No. 3. Under Penal Law § 175.10, the People are not required to establish that a defendant “acted with intent to defraud a particular person or business entity.” *Morgenthau v. Khalil*, 73 A.D.3d 509, 510 (1st Dep’t 2010); *see also People v. Coe*, 131 Misc. 2d 807, 813 (Sup. Ct. N.Y. Cty. 1986) (“Intent to defraud anyone is sufficient.”).

Request No. 4: “Identify what Donald J. Trump intend to defraud from the person or entity identified in response to item 1(b).”

People’s Response to Request No. 4: The People note that there is no item “1(b)” in defendant’s requests and it is unclear what is requested by “[i]dentify what Donald J. Trump intend to defraud.” To the extent that Request No. 4 seeks factual information, that factual information is contained in the Indictment and Statement of Facts, and will be contained in the discovery that the People will provide pursuant to CPL Article 245. To the extent that Request No. 4 seeks “matters of evidence relating to how the people intend to prove the elements of the offense charged,” CPL 200.95(1)(a), that information is outside the scope of a bill of particulars.

Respectfully submitted,

*/s/ Becky Mangold*

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Becky Mangold  
Assistant District Attorney

Dated: New York, New York  
May 12, 2023

# Exhibit 1

# NechelesLaw, LLP

1120 Avenue of the Americas  
New York, NY 10036

Susan Necheles  
srn@necheleslaw.com  
212-997-7400

April 27, 2023

By Email

Susan Hoffinger, Esq.  
Catherine McCaw, Esq.  
New York County District Attorney's Office  
1 Hogan Place, Room 847  
New York, NY 10013  
[REDACTED]

Re: *People v. Donald Trump*, Ind. No. 71543-23

Dear ADAs Hoffinger and McCaw,

Pursuant to New York Criminal Procedure Law ("CPL") § 200.95 we request a Bill of Particulars on behalf of Donald J. Trump. We are entitled to this Bill of Particulars because the factual information sought by these requests is needed by the defense to adequately prepare and conduct the defense in this case. Specifically, the requests seek factual information that is not recited in either the indictment or the People's statement of facts and which pertains to the offenses charged. *See* CPL § 200.95(1)(a). Pursuant to CPL § 200.95(2), within fifteen (15) days of service of this request please serve upon the undersigned and file with the Court a Bill of Particulars specifying the following items of factual information for each count of the indictment:

For each count of the Indictment:

1. Describe the substance of Donald J. Trump's conduct and specify as to each offense charged:

2. Specify the criminal statute (*i.e.*, "other crime") which Donald J. Trump is alleged to have committed or intended to commit or to aid or conceal the commission thereof by means of the allegedly false business record;

a. If the "other crime" you are relying on is N.Y. Elec. Law § 17-152, please identify (i) what are the "unlawful means," and (ii) who are the other members of the alleged conspiracy.

b. If the “other crime” is a tax crime, identify the tax returns which were intended to be incorrect or false and specify the manner in which they were intended to be false or incorrect.

3. Identify the person or entity who Donald J. Trump is alleged to have intended to defraud by means of the allegedly false business record; and

4. Identify what Donald J. Trump intend to defraud from the person or entity identified in response to item 1(b).

Respectfully,

/s/

Susan R. Necheles, Esq.  
Gedalia Stern, Esq.  
NechelesLaw, LLP.

Todd Blanche, Esq.  
Blanche Law, P.C.

Joseph Tacopina, Esq.  
Law Offices of Tacopina, Seigel & Deoreo

# EXHIBIT 4

**ADDENDUM A TO AUTOMATIC DISCOVERY FORM**

- Dan Alexander, *White House, Inc.: How Donald Trump Turned the Presidency into a Business* (Portfolio, 2020).
- William P. Barr, *One Damn Thing After Another: Memoirs of an Attorney General* (William Morrow 2022).
- Geoffrey Berman, *Holding the Line: Inside the Nation's Preeminent US Attorney's Office and Its Battle with the Trump Justice Department* (Penguin Press, 2022).
- Michael Cohen, *Disloyal: A Memoir: The True Story of the Former Personal Attorney to President Donald J. Trump* (Skyhorse Publishing, 2020).
- Michael Cohen, *Revenge: How Donald Trump Weaponized the US Department of Justice Against His Critics* (Melville House, 2022).
- Kellyanne Conway, *Here's the Deal: A Memoir* (Threshold Editions, an Imprint of Simon & Schuster, Inc., 2022).
- Stormy Daniels, *Full Disclosure* (St. Martin's Press, 2018).
- Ronan Farrow, *Catch and Kill: Lies, Spies, and a Conspiracy to Protect Predators* (Little, Brown and Company, 2019).
- Stephanie Grisham, *I'll Take Your Questions Now: What I Saw at the Trump White House* (Harper, 2021).
- Maggie Haberman, *Confidence Man: The Making of Donald Trump and the Breaking of America* (Penguin Press, 2022).
- Elie Honig, *Untouchable: How Powerful People Get Away with It* (Harper, 2023).
- The House Committee on Oversight and Reform, *Michael Cohen's House Testimony: The Complete Transcripts and Case Documents* (Diversion Books, 2019).
- Jonathan Karl, *Betrayal: The Final Act of the Trump Show* (Dutton, 2021).
- Jared Kushner, *Breaking History: A White House Memoir* (Broadside Books, 2022).
- Corey R. Lewandowski and David N. Bossie, *Let Trump Be Trump: The Inside Story of His Rise to the Presidency* (Center Street, 2017).
- Joe Palazzolo and Michael Rothfeld, *The Fixers: The Bottom-Feeders, Crooked Lawyers, Gossipmongers, and Porn Stars Who Created the 45th President* (Random House, 2020).

- Mike Pence, *So Help Me God* (Simon & Schuster, 2022).
- Mark Pomerantz, *People v. Donald Trump: An Inside Account* (Simon & Schuster, 2023).
- George H. Ross, *Trump-Style Negotiation: Powerful Strategies and Tactics for Mastering Every Deal* (Wiley, 2006).
- Dino Sajudin, *Trump Doorman* (Page Publishing, 2019).
- Donald J. Trump, *Our Journey Together* (Winning Team Publishing, 2021).
- Donald J. Trump and Bill Zanker, *Think Big: Make It Happen in Business and Life* (Harper Business, 2008).
- Donald J. Trump with Meredith McIver, *Trump Never Give Up: How I Turned My Biggest Challenges into Success* (Wiley, 2008).
- Donald J. Trump with Meredith McIver, *Trump: Think Like a Billionaire: Everything You Need to Know About Success, Real Estate, and Life* (Ballantine Books, 2005).
- Donald J. Trump with Tony Schwartz, *Trump: The Art of the Deal* (Random House, 1987).
- Mary L. Trump, *Too Much and Never Enough: How My Family Created the World's Most Dangerous Man* (Simon & Schuster, Inc., 2020).
- Katy Tur, *Unbelievable: My Front-Row Seat to the Craziest Campaign in American History* (Dey Street Books, 2017).
- Madeleine Westerhout, *Off the Record: My Dream Job at the White House, How I Lost It, and What I Learned* (Hachette Book Group, 2020).
- Stephanie Winston Wolkoff, *Melania and Me: The Rise and Fall of My Friendship with the First Lady* (Gallery Books, 2020).
- Michael Wolff, *Fire and Fury: Inside the Trump White House* (Henry Holt and Co., 2018).
- Bob Woodward, *RAGE* (Simon & Schuster, Inc., 2020).
- Bob Woodward, *The Trump Tapes: Bob Woodward's Twenty Interviews with President Donald Trump* (Simon & Schuster, Inc., 2022).
- James D. Zirin, *Plaintiff in Chief: A Portrait of Donald Trump in 3500 Lawsuits* (All Points Books, 2019).