

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

VERIFIED ANSWER OF
DONALD J. TRUMP

Defendant, Donald J. Trump ("Defendant"), by and through his undersigned counsel,
Habba Madaio & Associates LLP, for his Answer to the Verified Complaint of Plaintiff, the
Attorney General of the State of New York, responds as follows:

RESPONSES TO ALLEGATIONS

1. As to Paragraph 1, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant specifically denies the definitions of "Trump Organization" and "Defendants." While the shorthand "Trump Organization" is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization" and "Defendants," as used by the Attorney General, improperly group Defendants

together, without regard to the nature or discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise Defendant denies the allegations therein.

2. As to Paragraph 2, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant specifically denies the definitions of "Trump Organization" and "Defendants." While the shorthand "Trump Organization" is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization" and "Defendants," as used by the Attorney General, improperly group Defendants together, without regard to the nature or discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise Defendant denies the allegations therein.

3. As to Paragraph 3, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant specifically denies the definitions of "Trump Organization" and "Defendants." While the shorthand "Trump Organization" is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump

Organization" and "Defendants," as used by the Attorney General, improperly group Defendants together, without regard to the nature or discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise Defendant denies the allegations therein.

4. As to Paragraph 4, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant specifically denies the definitions of "Trump Organization" and "Defendants." While the shorthand "Trump Organization" is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization" and "Defendants," as used by the Attorney General, improperly group Defendants together, without regard to the nature or discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise Defendant denies the allegations therein.

5. As to Paragraph 5, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant specifically denies the definitions of "Trump Organization" and "Defendants." While the shorthand "Trump Organization" is utilized by Defendants for branding

and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization" and "Defendants," as used by the Attorney General, improperly group Defendants together, without regard to the nature or discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise Defendant denies the allegations therein.

6. As to Paragraph 6, Defendant specifically denies the definitions of "Trump Organization" and "Defendants." While the shorthand "Trump Organization" is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization" and "Defendants," as used by the Attorney General, improperly group Defendants together, without regard to the nature or discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise denies the allegations therein. Except Defendant admits only that Donald J. Trump initially, and starting in 2017 through 2021 the Trust, through its Trustees, was responsible for submitting the Statements of Financial Condition. As to footnote 2, denies the allegations therein. Except Defendant admits only that Mr. Weisselberg was removed as trustee as of July 2021.

7. As to Paragraph 7, denies the allegations therein. Otherwise refers to the full transcript embodying the statements referred to therein for a complete and accurate description of

its contents. Except Defendant admits only that meetings took place and that he exercised his right under the 5th Amendment of the U.S. Constitution not to be a witness against himself.

8. As to Paragraph 8, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant specifically denies the definitions of "Trump Organization" and "Defendants." While the shorthand "Trump Organization" is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization" and "Defendants," as used by the Attorney General, improperly group Defendants together, without regard to the nature or discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise denies the allegations therein.

9. As to Paragraph 9, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

10. As to Paragraph 10, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant specifically denies the definitions of "Trump Organization" and

"Defendants." While the shorthand "Trump Organization" is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization" and "Defendants," as used by the Attorney General, improperly group Defendants together, without regard to the nature or discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise denies the allegations therein.

11. As to Paragraph 11, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant specifically denies the definitions of "Trump Organization" and "Defendants." While the shorthand "Trump Organization" is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization" and "Defendants," as used by the Attorney General, improperly group Defendants together, without regard to the nature or discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise denies the allegations therein. Defendant refers to the full documents referred to therein for a complete and accurate description of its contents.

12. As to Paragraph 12, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is

required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant specifically denies the definition of "Defendants." The definitions of "Defendants," as used by the Attorney General, improperly groups the natural person Defendants together and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise denies the allegations therein.

13. As to Paragraph 13, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant specifically denies the definitions of "Trump Organization" and "Defendants." While the shorthand "Trump Organization" is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization" and "Defendants," as used by the Attorney General, improperly group Defendants together, without regard to the nature or discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise denies the allegations therein. Defendant refers to the full documents referred to therein for a complete and accurate description of its contents.

14. As to Paragraph 14, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a

response is required, Defendant specifically denies the definitions of “Trump Organization” and “Defendants.” While the shorthand “Trump Organization” is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of “Trump Organization” and “Defendants,” as used by the Attorney General, improperly group Defendants together, without regard to the nature or discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not “sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved”, and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise denies the allegations therein. Defendant refers to the full documents referred to therein for a complete and accurate description of its contents.

15. As to Paragraph 15, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant specifically denies the definitions of “Trump Organization” and “Defendants.” While the shorthand “Trump Organization” is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of “Trump Organization” and “Defendants,” as used by the Attorney General, improperly group Defendants together, without regard to the nature or discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not “sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved”, and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise denies the allegations therein. Defendant specifically denies the allegations contained in the exhibit cited therein, which was prepared by the Attorney General and represents

the Attorney General's characterizations of facts. Defendant refers to the full documents referred to therein for a complete and accurate description of its contents.

16. As to Paragraph 16, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant specifically denies the definition of “Defendants.” The definitions of “Defendants,” as used by the Attorney General, improperly groups the natural person Defendants together and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not “sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved”, and thus fails to satisfy the basic pleading requirements of CPLR 3013.

17. As to Paragraph 17, Defendant specifically denies the definitions of "Trump Organization" and "Defendants." While the shorthand "Trump Organization" is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization" and "Defendants," as used by the Attorney General, improperly group Defendants together, without regard to the nature or discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

18. As to Paragraph 18, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant specifically denies the definitions of "Trump Organization" and "Defendants." While the shorthand "Trump Organization" is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization" and "Defendants," as used by the Attorney General, improperly group Defendants together, without regard to the nature or discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise denies the allegations therein. Defendant refers to the full documents referred to therein for a complete and accurate description of its contents. Except Defendant admits only and generally that Statements were submitted to counterparties.

19. As to Paragraph 19, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant denies the allegations therein. Defendant refers to the full documents referred to therein for a complete and accurate description of its contents.

20. As to Paragraph 20, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant specifically denies the definition of "Trump Organization". While

that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise denies the allegations therein. Defendant refers to the full documents referred to therein for a complete and accurate description of its contents. As to Footnote 3, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full documents referred to therein for a complete and accurate description of its contents.

21. As to Paragraph 21, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant specifically denies the definition of "Trump Organization". While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise denies the allegations therein.

Defendant refers to the full documents referred to therein for a complete and accurate description of its contents.

22. As to Paragraph 22, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant specifically denies the definition of "Trump Organization". While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise denies the allegations therein. Defendant refers to the full documents referred to therein for a complete and accurate description of its contents.

23. As to Paragraph 23, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant denies the allegations therein.

24. As to Paragraph 24, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is

required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant denies the allegations therein.

25. As to Paragraph 25, the allegations contained therein describe elements of judicial relief that the Attorney General seeks in the instant litigation or state legal arguments or conclusions of law or mixed conclusions of law and fact, to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant denies the allegations therein.

26. As to Paragraph 26, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof.

27. As to Paragraph 27, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Except Defendant admits only that he Director, President, and Chairman of Trump Organization Inc. in the stated time frame.

28. As to Paragraph 28, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial."

29. As to Paragraph 29, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies each and every allegation therein.

30. As to Paragraph 30, Defendant specifically denies the definition of "Trump Organization". While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the

discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not “sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved”, and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise denies the allegations therein. Except Defendant admits only that there was a New York Trust that held assets, which is now a Florida Trust.

31. As to Paragraph 31, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise denies the allegations therein. Except Defendant admits only that Exhibit 2 was provided to the NYAG.

32. As to Paragraph 32, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise lacks sufficient

knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial."

33. As to Paragraph 33, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial."

34. As to Paragraph 34, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial."

35. As to Paragraph 35, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial."

36. As to Paragraph 36, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial."

37. As to Paragraph 37, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by

the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Except Defendant admits only that Weisselberg had a role in the preparation of the Statements.

38. As to Paragraph 38, Defendant denies the allegations therein. Except Defendant admits only that Donald Trump Jr. is the sole trustee and Weisselberg was a trustee until he was removed in 2021.

39. As to Paragraph 39, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Except Defendant admits only that Mr. McConney had a role in the preparation of the Statements.

40. As to Paragraph 40, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant denies the allegations therein.

41. As to Paragraph 41, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof.

42. As to Paragraph 42, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof.

43. As to Paragraph 43, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof.

44. As to Paragraph 44, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof.

45. As to Paragraph 45, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof.

46. As to Paragraph 46, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof.

47. As to Paragraph 47, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof.

48. As to Paragraph 48, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant denies the allegations therein.

49. As to Paragraph 49, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant denies the allegations therein because venue is proper in the commercial division.

50. As to Paragraph 50, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant specifically denies the definitions of "Trump Organization" and "Defendants." While the shorthand "Trump Organization" is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization" and "Defendants," as used by the Attorney General, improperly group Defendants

together, without regard to the nature or discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise denies the allegations therein. Defendant specifically denies the allegations contained in the roadmap therein, which was prepared by the Attorney General and represents the Attorney General's characterizations of facts.

51. As to Paragraph 51, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant specifically denies the allegations contained in the chart therein, which was prepared by the Attorney General and represents the Attorney General's characterizations of facts. Defendant refers to the full documents referred to therein for a complete and accurate description of their contents.

52. As to Paragraph 52, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies each and every allegation contained therein at all times prior to January 2017 and lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained

therein at all times after January 2017, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full documents referred to therein for a complete and accurate description of their contents. Except Defendant admits only and generally that Statements were submitted.

53. As to Paragraph 53, denies each and every allegation contained therein at all times prior to January 2017 and lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein at all times after January 2017, which, pursuant to CPLR 3018, "shall have the effect of a denial." Except Defendant admits only that Mazars is an accounting firm that worked on the Statements.

54. As to Paragraph 54, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise denies each and every allegation contained therein at all times prior to January 2017 and lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein at all times after January 2017, which, pursuant to CPLR 3018, "shall have the effect of a denial." Except Defendant admits only that Mazars is an accounting firm that had a role in preparing the Statements.

55. As to Paragraph 55, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein. Defendant refers to the full documents referred to therein for a complete and accurate description of their contents.

56. As to Paragraph 56, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy

the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein. Defendant refers to the full documents referred to therein for a complete and accurate description of their contents.

57. As to Paragraph 57, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein. Defendant refers to the full documents referred to therein for a complete and accurate description of their contents.

58. As to Paragraph 58, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of their contents.

59. As to Paragraph 59, Defendant admits only that Whitley Penn LLP compiled the 2021 Statement.

60. As to Paragraph 60, Defendant admits only that Exhibits 3 -13 are true and correct copies of the Statements.

61. As to Paragraph 61, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein.

62. As to Paragraph 62, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise lacks sufficient

knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial."

63. As to Paragraph 63, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial."

64. As to Paragraph 64, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant denies the allegations therein. Defendant refers to the full documents referred to therein for a complete and accurate description of their contents.

65. As to Paragraph 65, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise denies the allegations therein. Except Defendant admits only and generally that Statements were submitted to counterparties.

66. As to Paragraph 66, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, “shall have the effect of a denial.” Defendant refers to the full documents referred to therein for a complete and accurate description of their contents.

67. As to Paragraph 67, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant denies the allegations therein. Defendant refers to the full documents referred to therein for a complete and accurate description of their contents.

68. As to Paragraph 68, denies the allegations therein. Defendant refers to the full documents referred to therein for a complete and accurate description of their contents.

69. As to Paragraph 69, denies the allegations therein. Defendant refers to the full documents referred to therein for a complete and accurate description of their contents.

70. As to Paragraph 70, denies the allegations therein. Defendant refers to the full documents referred to therein for a complete and accurate description of their contents. Except Defendant admits only that the litigation regarding the partnerships took place.

71. As to Paragraph 71, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is

required and as to which the Attorney General must meet her burden of proof. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

72. As to Paragraph 72, Defendant specifically denies the definition of “Trump Organization.” While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of “Trump Organization”, as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not “sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved”, and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, “shall have the effect of a denial.” Defendant refers to the full documents referred to therein for a complete and accurate description of their contents.

73. As to Paragraph 73, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, “shall have the effect of a denial.” Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

74. As to Paragraph 74, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, “shall have the effect of a denial.” Defendant refers to the full documents referred to therein for a complete and accurate description of their contents.

75. As to Paragraph 75, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, “shall have the effect of a denial.” Defendant specifically denies the allegations contained in the chart cited therein, which was prepared by the Attorney General and represents the Attorney General's characterizations of facts.

76. As to Paragraph 76, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

77. As to Paragraph 77, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

78. As to Paragraph 78, Defendant denies the allegations therein. Defendant refers to the full documents referred to therein for a complete and accurate description of their contents.

79. As to Paragraph 79, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant denies the allegations therein. Defendant refers to the full documents referred to therein for a complete and accurate description of their contents.

80. As to Paragraph 80, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant specifically denies the allegations contained in the chart cited therein, which was prepared by the Attorney General and represents the Attorney General's characterizations of facts. Defendant refers to the full documents referred to therein for a complete and accurate description of their contents.

81. As to Paragraph 81, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant denies the allegations therein. Defendant specifically denies the allegations contained in the chart cited therein, which was prepared by the Attorney General and represents the Attorney General's characterizations of facts. Defendant refers to the full documents referred to therein for a complete and accurate description of their contents.

82. As to Paragraph 82, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full documents referred to therein for a complete and accurate description of their contents.

83. As to Paragraph 83, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes,

no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial."

84. As to Paragraph 84, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein.

85. As to Paragraph 85, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by

the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not “sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved”, and thus fails to satisfy the basic pleading requirements of CPLR 3013. Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, “shall have the effect of a denial.” Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

86. As to Paragraph 86, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein.

87. As to Paragraph 87, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give

the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein. Defendant refers to the full documents referred to therein for a complete and accurate description of their contents.

88. As to Paragraph 88, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

89. As to Paragraph 89, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus

fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full documents referred to therein for a complete and accurate description of their contents.

90. As to Paragraph 90, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full documents referred to therein for a complete and accurate description of their contents.

91. As to Paragraph 91, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give

the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

92. As to Paragraph 92, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

93. As to Paragraph 93, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or

Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

94. As to Paragraph 94, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

95. As to Paragraph 95, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give

the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein. Defendant specifically denies the allegations contained in the chart cited therein, which was prepared by the Attorney General and represents the Attorney General's characterizations of facts. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

96. As to Paragraph 96, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

97. As to Paragraph 97, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant specifically denies the definition of "Trump Organization." While

that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of “Trump Organization”, as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not “sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved”, and thus fails to satisfy the basic pleading requirements of CPLR 3013. Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, “shall have the effect of a denial.” Defendant refers to the full transcript embodying the statements referred to therein for a complete and accurate description of its contents.

98. As to Paragraph 98, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein. Defendant refers to the full documents referred to therein for a complete and accurate description of their contents.

99. As to Paragraph 99, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes,

no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein. Defendant refers to the full documents referred to therein for a complete and accurate description of their contents.

100. As to Paragraph 100, Defendant denies the allegations therein. Defendant refers to the full documents referred to therein for a complete and accurate description of their contents.

101. As to Paragraph 101, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial."

102. As to Paragraph 102, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant denies the allegations therein. Defendant refers to the full documents referred to therein for a complete and accurate description of their contents.

103. As to Paragraph 103, Defendant denies the allegations therein.

104. As to Paragraph 104, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes,

no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full transcript embodying the statements referred to therein for a complete and accurate description of its contents.

105. As to Paragraph 105, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein.

106. As to Paragraph 106, Defendant denies lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Except Defendant admits only that Ivanka Trump she rented a penthouse in Trump Park Avenue.

107. As to Paragraph 107, Defendant denies lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Except Defendant admits only that Ivanka Trump she rented a penthouse in Trump Park Avenue.

108. As to Paragraph 108, Defendant denies the allegations therein. Except Defendant admits only that Ms. Trump was given an option to purchase a penthouse at Trump Park Avenue, and that a 2014 Statement was created. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

109. As to Paragraph 109, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

110. As to Paragraph 110, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein at all times prior to January 2017, which, pursuant to CPLR 3018, "shall have the effect of a denial." Further, Defendant denies each and every allegation contained therein at all times after January 2017. Defendant refers to the full documents referred to therein for a complete and accurate description of their contents.

111. As to Paragraph 111, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR

3018, "shall have the effect of a denial." Defendant refers to the full transcript embodying the statements referred to therein for a complete and accurate description of its contents.

112. As to Paragraph 112, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Except Defendant admits only that an amendment was signed.

113. As to Paragraph 113, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

114. As to Paragraph 114, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is

required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

115. As to Paragraph 115. Defendant denies the allegations therein. Defendant specifically denies the allegations contained in the chart cited therein, which was prepared by the Attorney General and represents the Attorney General's characterizations of facts. Defendant refers to the full documents referred to therein for a complete and accurate description of their contents.

116. As to Paragraph 116, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

117. As to Paragraph 117, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is

required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant denies the allegations therein.

118. As to Paragraph 118, Defendant denies the allegations therein. Defendant refers to the full documents referred to therein for a complete and accurate description of their contents.

119. As to Paragraph 119, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

120. As to Paragraph 120, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

121. At to Paragraph 121, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

122. As to Paragraph 122, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and

parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein. Except Defendant admits appraisals took place.

123. As to Paragraph 123, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

124. As to Paragraph 124, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

125. As to Paragraph 125, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents. Except Defendant admits only that 40 Wall Street LLC negotiated new loan terms with Ladder Capital Finance.

126. As to Paragraph 126, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

127. As to Paragraph 127, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

128. As to Paragraph 128, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by

the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial."

129. As to Paragraph 129, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial."

130. As to the allegation in paragraph 130, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

131. As to Paragraph 131, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR

3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

132. At to paragraph 132, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

133. As to Paragraph 133, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy

the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein.

134. As to Paragraph 134, Defendant denies the allegations therein. Defendant refers to the full documents referred to therein for a complete and accurate description of their contents. "

135. As to Paragraph 135, Defendant denies the allegations therein. Defendant refers to the full documents referred to therein for a complete and accurate description of their contents. "

136. As to Paragraph 136, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full documents referred to therein for a complete and accurate description of their contents."

137. As to Paragraph 137, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full documents referred to therein for a complete and accurate description of their contents."

138. As to Paragraph 138, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the

discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Defendant denies the allegations therein at all times prior to January 2017 and lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein at all times after January 2017, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full documents referred to therein for a complete and accurate description of their contents.

139. As to Paragraph 139, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

140. As to Paragraph 140, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

141. As to Paragraph 141, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

142. As to Paragraph 142, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant

refers to the full document referred to therein for a complete and accurate description of its contents.

143. As to Paragraph 143, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

144. As to Paragraph 144, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

145. As to Paragraph 145, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the

discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

146. As to Paragraph 146, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

147. As to Paragraph 147, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by

the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents. Except admits only that an interest in Niketown is held.

148. As to Paragraph 148, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents. Except admits only that an interest in Niketown is held.

149. As to Paragraph 149, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes,

no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents. Except admits only that an interest in Niketown is held.

150. As to Paragraph 150, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

151. As to Paragraph 151, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

152. As to Paragraph 152, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

153. As to Paragraph 153, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

154. As to Paragraph 154, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

155. As to Paragraph 155, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

156. As to Paragraph 156, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

157. As to Paragraph 157, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

158. As to Paragraph 158, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

159. As to Paragraph 159, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

160. As to Paragraph 160, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full documents referred to therein for a complete and accurate description of their contents.

161. As to Paragraph 161, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant specifically denies the allegations contained

in the chart cited therein, which was prepared by the Attorney General and represents the Attorney General's characterizations of facts. Defendant refers to the full documents referred to therein for a complete and accurate description of their contents.

162. As to Paragraph 162, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant specifically denies the allegations contained in the chart cited therein, which was prepared by the Attorney General and represents the Attorney General's characterizations of facts. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

163. As to Paragraph 163, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

164. As to Paragraph 164, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

165. As to Paragraph 165, Defendant denies the allegations therein at all times prior to January 2017 and lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein at all times after January 2017, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents. Except Defendant admits only and generally that Statements were submitted.

166. As to Paragraph 166, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant denies the allegations therein at all times prior to January 2017 and lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein at all times after January 2017, which, pursuant to CPLR 3018, “shall have the effect of a denial.” Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

167. As to Paragraph 167, Defendant denies the allegations therein at all times prior to January 2017 and lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein at all times after January 2017, which, pursuant to CPLR 3018, “shall have the effect of a denial.” Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

168. As to Paragraph 168, Defendant specifically denies the definition of “Trump Organization.” While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of “Trump Organization”, as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not “sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved”, and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, “shall have the effect of a denial.” Defendant

refers to the full document referred to therein for a complete and accurate description of its contents.

169. As to Paragraph 169, Defendant specifically denies the definition of “Trump Organization.” While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of “Trump Organization”, as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not “sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved”, and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, “shall have the effect of a denial.” Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

170. As to Paragraph 170, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations

contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

171. As to Paragraph 171, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

172. As to Paragraph 172, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein at all times prior to January 2017 and lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein at all times after January

2017, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

173. As to Paragraph 173, Defendant denies the allegations therein at all times prior to January 2017 and lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein at all times after January 2017, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

174. As to Paragraph 174, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

175. As to Paragraph 175, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein at all times prior to January 2017 and lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein at all times after January

2017, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full documents referred to therein for a complete and accurate description of their contents.

176. As to Paragraph 176, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein at all times prior to January 2017 and lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein at all times after January 2017, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full transcript embodying the statements referred to therein for a complete and accurate description of its contents.

177. As to Paragraph 177, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the

allegations therein at all times prior to January 2017 and lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein at all times after January 2017, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full documents referred to therein for a complete and accurate description of their contents.

178. As to Paragraph 178, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein at all times prior to January 2017 and lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein at all times after January 2017, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full documents referred to therein for a complete and accurate description of their contents.

179. As to Paragraph 179, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus

fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

180. As to Paragraph 180, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

181. As to Paragraph 181, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

182. As to Paragraph 182, Defendant denies the allegations therein at all times prior to January 2017 and lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein at all times after January 2017, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full documents referred to therein for a complete and accurate description of their contents."

183. As to Paragraph 183, Defendant denies the allegations therein at all times prior to January 2017 and lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein at all times after January 2017, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full documents referred to therein for a complete and accurate description of their contents."

184. As to Paragraph 184, Defendant denies the allegations therein at all times prior to January 2017 and lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein at all times after January 2017, which, pursuant to CPLR 3018, “shall have the effect of a denial.” Defendant refers to the full documents referred to therein for a complete and accurate description of their contents.”

185. As to Paragraph 185, Defendant denies the allegations therein at all times prior to January 2017 and lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein at all times after January 2017, which, pursuant to CPLR 3018, “shall have the effect of a denial.” Defendant refers to the full documents referred to therein for a complete and accurate description of their contents.”

186. As to Paragraph 186, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant specifically denies the definition of “Trump Organization.” While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of “Trump Organization,” as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not “sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved”, and thus fails to satisfy the basic pleading requirements of CPLR 3013. Defendant denies the allegations therein at all times prior to January 2017 and lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein at all times after January 2017, which,

pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full documents referred to therein for a complete and accurate description of their contents."

187. As to Paragraph 187, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

188. As to Paragraph 188, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations

contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full transcript embodying the statements referred to therein for a complete and accurate description of its contents.

189. As to Paragraph 189, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

190. As to Paragraph 190, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

191. As to Paragraph 191, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full documents referred to therein for a complete and accurate description of their contents.

192. As to Paragraph 192, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

193. As to Paragraph 193, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

194. As to Paragraph 194, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney

General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

195. As to Paragraph 195, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

196. As to Paragraph 196, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a

response is required, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

197. As to Paragraph 197, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

198. As to Paragraph 198, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

199. As to Paragraph 199, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant lacks sufficient knowledge

or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, “shall have the effect of a denial.” Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

200. As to Paragraph 200, Defendant denies the allegations therein. Defendant specifically denies the allegations contained in the chart cited therein, which was prepared by the Attorney General and represents the Attorney General's characterizations of facts. Defendant refers to the full documents referred to therein for a complete and accurate description of their contents.

201. As to Paragraph 201, Defendant denies the allegations therein. Defendant specifically denies the allegations contained in the chart cited therein, which was prepared by the Attorney General and represents the Attorney General's characterizations of facts. Defendant refers to the full documents referred to therein for a complete and accurate description of their contents.

202. As to Paragraph 202, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations

therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

203. As to Paragraph 203, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full documents referred to therein for a complete and accurate description of their contents.

204. As to Paragraph 204, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant denies the allegations therein. Defendant refers to the full documents referred to therein for a complete and accurate description of their contents.

205. As to Paragraph 205, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations

therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

206. As to Paragraph 206, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

207. As to Paragraph 207, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the

conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

208. As to Paragraph 208, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial."

209. As to Paragraph 209, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the

allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

210. As to Paragraph 210, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

211. As to Paragraph 211, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and

parties notice of the transactions [or] occurrences ... intended to be proved”, and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, “shall have the effect of a denial.” Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

212. As to Paragraph 212, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

213. As to Paragraph 213, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

214. As to Paragraph 214, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

215. As to Paragraph 215, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

216. As to Paragraph 216, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

217. As to Paragraph 217, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial."

218. As to Paragraph 218, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full documents referred to therein for a complete and accurate description of their contents.

219. As to Paragraph 219, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full documents referred to therein for a complete and accurate description of their contents.

220. As to Paragraph 220, Defendant denies the allegations therein. Defendant refers to the full documents referred to therein for a complete and accurate description of their contents.

221. As to Paragraph 221, the allegations therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant denies the allegations therein.

222. As to Paragraph 222, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein at all times prior to January 2017 and lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein at all times after January 2017, which, pursuant to CPLR 3018, "shall have the effect of a denial."

223. As to Paragraph 223, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

224. As to Paragraph 224, the allegations therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

225. As to Paragraph 225, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes,

no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein.

226. As to Paragraph 226, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial."

227. As to Paragraph 227, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial."

228. As to Paragraph 228, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

229. As to Paragraph 229, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial."

230. As to Paragraph 230, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

231. As to Paragraph 231, the allegations therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

232. As to Paragraph 232, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

233. As to Paragraph 233, Defendant denies the allegations therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Except Defendant admits only the first sentence of the paragraph.

234. As to Paragraph 234, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR

3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

235. As to Paragraph 235, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

236. As to Paragraph 236, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

237. As to Paragraph 237, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

238. As to Paragraph 238, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

239. As to Paragraph 239, the allegations therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

240. As to Paragraph 240, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein.

241. As to Paragraph 241, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes,

no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

242. As to Paragraph 242, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

243. As to Paragraph 243, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial."

244. As to Paragraph 244, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents..

245. As to Paragraph 245, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full transcript embodying the statements referred to therein for a complete and accurate description of its contents.

246. As to Paragraph 246, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial."

247. As to Paragraph 247, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial."

248. As to Paragraph 248, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or

Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial."

249. As to Paragraph 249, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial."

250. As to Paragraph 250, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant lacks

sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

251. As to Paragraph 251, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

252. As to Paragraph 252, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus

fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

253. As to Paragraph 253, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

254. As to Paragraph 254, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or

Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial."

255. As to Paragraph 255, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial."

256. As to Paragraph 256, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant lacks

sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents..

257. As to Paragraph 257, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

258. As to Paragraph 258, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus

fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

259. As to Paragraph 259, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents. Except that Defendant admits only that an appraisal was submitted to the IRS as part of the easement donation for Seven Springs.

260. As to Paragraph 260, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

261. As to Paragraph 261, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

262. As to Paragraph 262, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full documents referred to therein for a complete and accurate description of their contents.

263. As to Paragraph 263, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

264. As to Paragraph 264, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

265. As to Paragraph 265, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

266. As to Paragraph 266, denies the allegations therein. Defendant specifically denies the allegations contained in the exhibit cited therein, which was prepared by the Attorney General and represents the Attorney General's characterization of facts. Defendant refers to the documents referred to therein for a complete and accurate description of their contents.

267. As to Paragraph 267, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant denies the allegations therein.

268. As to Paragraph 268, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant denies the allegations therein.

269. As to Paragraph 269, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant denies the allegations therein.

270. As to Paragraph 270, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Except Defendant admits only the last sentence of Paragraph 270.

271. As to Paragraph 271, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial."

272. As to Paragraph 272, denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

273. As to Paragraph 273, denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents. Except Defendant admits only that he took journalists on a tour of the Triplex in 2015.

274. As to Paragraph 274, denies the allegations therein. Defendant refers to the documents referred to therein for a complete and accurate description of their contents.

275. As to Paragraph 275, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

276. As to Paragraph 276, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR

3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

277. As to Paragraph 277, denies the allegations therein. Defendant refers to the documents referred to therein for a complete and accurate description of their contents.

278. As to Paragraph 278, Defendant specifically denies the definition of "Trump Organization". While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

279. As to Paragraph 279, denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

280. As to Paragraph 280, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

281. As to Paragraph 281, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

282. As to Paragraph 282, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant denies the allegations therein.

283. As to Paragraph 283, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

284. As to Paragraph 284, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

285. As to Paragraph 285, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant specifically denies the definition of "Trump Organization". While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney

General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

286. As to Paragraph 286, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

287. As to Paragraph 287, Defendant specifically denies the definition of "Trump Organization". While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

288. As to Paragraph 288, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

289. As to Paragraph 289, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

290. As to Paragraph 290, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents. Except Defendant admits only that the 2016 Statement was sent to Deutsche Bank.

291. As to Paragraph 291, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full transcript embodying the statements referred to therein for a complete and accurate description of its contents.

292. As to Paragraph 292, denies the allegations therein. Except Defendant admits only that he exercised his right under the 5th Amendment of the U.S. Constitution not to be a witness against himself.

293. As to Paragraph 293, Defendant specifically denies the definition of "Trump Organization". While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

294. As to Paragraph 294, Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

295. As to Paragraph 295, Defendant specifically denies the definition of "Trump Organization". While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Defendant specifically denies the allegations contained in the exhibit cited therein, which was prepared by the Attorney General and represents the Attorney General's characterization of facts. Defendant refers to the documents

referred to therein for a complete and accurate description of their contents. Otherwise, Defendant denies each and every allegation contained therein at all times prior to January 2017 and lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein at all times after January 2017, which, pursuant to CPLR 3018, "shall have the effect of a denial."

296. As to Paragraph 296, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant denies each and every allegation contained therein at all times prior to January 2017 and lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein at all times after January 2017, which, pursuant to CPLR 3018, "shall have the effect of a denial."

297. As to Paragraph 297, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

298. As to Paragraph 298, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

299. As to Paragraph 299, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

300. As to Paragraph 300, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

301. As to Paragraph 301, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. Except lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial."

302. As to Paragraph 302, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant denies each and every allegation contained therein at all times prior to January 2017 and lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein at all times after January 2017, which, pursuant to CPLR 3018, "shall have the effect of a denial."

303. As to Paragraph 303, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial."

304. As to Paragraph 304, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant specifically denies the definition of "Trump Organization". While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Defendant refers to the documents referred to therein for a complete and accurate description of their contents. Otherwise, Defendant denies each and every allegation contained therein at all times prior to January 2017 and lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein at all times after January 2017, which, pursuant to CPLR 3018, "shall have the effect of a denial."

305. As to Paragraph 305, Defendant specifically denies the definition of "Trump Organization". While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the

discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Defendant refers to the documents referred to therein for a complete and accurate description of their contents. Otherwise, Defendant denies each and every allegation contained therein at all times prior to January 2017 and lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein at all times after January 2017, which, pursuant to CPLR 3018, "shall have the effect of a denial," Except Defendant admits only that he was involved in litigation regarding Vornado partnership agreement.

306. As to Paragraph 306, denies each and every allegation contained therein at all times prior to January 2017 and lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein at all times after January 2017, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the documents referred to therein for a complete and accurate description of their contents.

307. As to Paragraph 307, Defendant specifically denies the definition of "Trump Organization". While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies each

and every allegation contained therein at all times prior to January 2017 and lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein at all times after January 2017, which, pursuant to CPLR 3018, "shall have the effect of a denial."

308. As to Paragraph 308, Defendant specifically denies the definition of "Trump Organization". While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies each and every allegation contained therein at all times prior to January 2017 and lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein at all times after January 2017, which, pursuant to CPLR 3018, "shall have the effect of a denial."

309. As to Paragraph 309, Defendant specifically denies the definition of "Trump Organization". While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus

fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies each and every allegation contained therein at all times prior to January 2017 and lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein at all times after January 2017, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

310. As to Paragraph 310, Defendant specifically denies the definition of "Trump Organization". While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

311. As to Paragraph 311, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant specifically denies the definition of "Trump Organization". While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal

identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not “sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved”, and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

312. As to Paragraph 312, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant specifically denies the definition of “Trump Organization”. While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of “Trump Organization”, as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not “sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved”, and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

313. As to Paragraph 313, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant specifically denies the definition of “Trump Organization”. While

that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of “Trump Organization”, as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not “sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved”, and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies each and every allegation contained therein at all times prior to January 2017 and lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein at all times after January 2017, which, pursuant to CPLR 3018, “shall have the effect of a denial.” Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

314. As to Paragraph 314, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant specifically denies the definition of “Trump Organization”. While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of “Trump Organization”, as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not “sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved”, and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies each and every

allegation contained therein at all times prior to January 2017 and lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein at all times after January 2017, which, pursuant to CPLR 3018, “shall have the effect of a denial.” Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

315. As to Paragraph 315, Defendant specifically denies the definition of “Trump Organization”. While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of “Trump Organization”, as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not “sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved”, and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, “shall have the effect of a denial.” Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

316. As to Paragraph 316, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant specifically denies the definition of “Trump Organization”. While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of “Trump Organization”, as used by the Attorney

General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

317. As to Paragraph 317, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

318. As to Paragraph 318, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a

response is required, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

319. As to Paragraph 319, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies each and every allegation contained therein at all times prior to January 2017 and lacks sufficient knowledge or

information to form a belief as to the truth or falsity of the allegations contained therein at all times after January 2017, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

320. As to Paragraph 320, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

321. As to Paragraph 321, denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

322. As to Paragraph 322, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is

required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies each and every allegation contained therein at all times prior to January 2017 and lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein at all times after January 2017, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

323. As to Paragraph 323, Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

324. As to Paragraph 324, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

325. As to Paragraph 325, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant specifically denies the definitions of "Trump Organization" and "Defendants." While the shorthand "Trump Organization" is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization" and "Defendants," as used by the Attorney General, improperly group Defendants together, without regard to the nature or discrete legal identity of each Defendant, and fail to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies each and every allegation contained therein at all times prior to January 2017 and lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein at all times after January 2017, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

326. As to Paragraph 326, Defendant specifically denies the definitions of "Trump Organization" and "Defendants." While the shorthand "Trump Organization" is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization" and "Defendants," as used by the Attorney General, improperly group Defendants together, without regard to the nature or discrete legal identity of each Defendant, and fail to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the

transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

327. As to Paragraph 327, Defendant specifically denies the definitions of "Trump Organization" and "Defendants." While the shorthand "Trump Organization" is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization" and "Defendants," as used by the Attorney General, improperly group Defendants together, without regard to the nature or discrete legal identity of each Defendant, and fail to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

328. As to Paragraph 328, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

329. As to Paragraph 329, Defendant specifically denies the definitions of "Trump Organization" and "Defendants." While the shorthand "Trump Organization" is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization" and "Defendants," as used by the Attorney General, improperly group Defendants together, without regard to the nature or discrete legal identity of

each Defendant, and fail to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

330. As to Paragraph 330, Defendant specifically denies the definitions of "Trump Organization" and "Defendants." While the shorthand "Trump Organization" is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization" and "Defendants," as used by the Attorney General, improperly group Defendants together, without regard to the nature or discrete legal identity of each Defendant, and fail to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

331. As to Paragraph 331, Defendant specifically denies the definitions of "Trump Organization" and "Defendants." While the shorthand "Trump Organization" is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization" and "Defendants," as used by the Attorney General,

improperly group Defendants together, without regard to the nature or discrete legal identity of each Defendant, and fail to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

332. As to Paragraph 332, Defendant specifically denies the definitions of "Trump Organization" and "Defendants." While the shorthand "Trump Organization" is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization" and "Defendants," as used by the Attorney General, improperly group Defendants together, without regard to the nature or discrete legal identity of each Defendant, and fail to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

333. As to Paragraph 333, Defendant specifically denies the definitions of "Trump Organization" and "Defendants." While the shorthand "Trump Organization" is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization" and "Defendants," as used by the Attorney General, improperly group Defendants together, without regard to the nature or discrete legal identity of

each Defendant, and fail to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

334. As to Paragraph 334, Defendant specifically denies the definitions of "Trump Organization" and "Defendants." While the shorthand "Trump Organization" is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization" and "Defendants," as used by the Attorney General, improperly group Defendants together, without regard to the nature or discrete legal identity of each Defendant, and fail to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

335. As to Paragraph 335, denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

336. As to Paragraph 336, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant specifically denies the definitions of "Trump Organization" and "Defendants." While the shorthand "Trump Organization" is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization" and "Defendants," as used by the Attorney General, improperly group Defendants together, without regard to the nature or discrete legal identity of each Defendant, and fail to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

337. As to Paragraph 337, Defendant specifically denies the definitions of "Trump Organization" and "Defendants." While the shorthand "Trump Organization" is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization" and "Defendants," as used by the Attorney General, improperly group Defendants together, without regard to the nature or discrete legal identity of each Defendant, and fail to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise denies the allegations therein. Defendant refers to the full

document referred to therein for a complete and accurate description of its contents. Except Defendant admits only that the appraisal was obtained and the appraisal speaks for itself.

338. As to Paragraph 338, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial."

339. As to Paragraph 339, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial."

340. As to Paragraph 340, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

341. Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents, except Defendant admits only that an appraisal was obtained in 2016.

342. As to Paragraph 342, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

343. As to Paragraph 343, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the

allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

344. As to Paragraph 344, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

345. As to Paragraph 345, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

346. As to Paragraph 346, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein.

347. As to Paragraph 347, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

348. As to Paragraph 348, Defendant specifically denies the definition of “Trump Organization.” While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of “Trump Organization”, as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not “sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved”, and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

349. As to Paragraph 349, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant specifically denies the definition of “Trump Organization.” While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of “Trump Organization”, as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not “sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved”, and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which,

pursuant to CPLR 3018, “shall have the effect of a denial.” Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

350. As to Paragraph 350, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant specifically denies the definition of “Trump Organization.” While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of “Trump Organization”, as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not “sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved”, and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

351. As to Paragraph 351, Defendant specifically denies the definition of “Trump Organization.” While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of “Trump Organization”, as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not “sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved”, and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the

allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

352. As to Paragraph 352, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

353. As to Paragraph 353, Defendant denies the allegations therein at all times prior to January 2017 and lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein at all times after January 2017, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant specifically denies the allegations contained in the chart therein, which was prepared by the Attorney General and represents the Attorney General's characterizations of facts. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

354. As to Paragraph 354, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

355. As to Paragraph 355, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

356. As to Paragraph 356, Defendant denies the allegations therein at all times prior to January 2017 and lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein at all times after January 2017, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the documents referred to therein for a complete and accurate description of their contents.

357. As to Paragraph 357, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

358. As to Paragraph 358, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

359. As to Paragraph 359, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full transcript embodying the statements referred to therein for a complete and accurate description of its contents.

360. As to Paragraph 360, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

361. As to Paragraph 361, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy

the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

362. As to Paragraph 362, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

363. As to Paragraph 363, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

364. As to Paragraph 364, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

365. As to Paragraph 365, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

366. As to Paragraph 366, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

367. As to Paragraph 367, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

368. As to Paragraph 368, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

369. As to Paragraph 369, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

370. As to Paragraph 370, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

371. As to Paragraph 371, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

372. As to Paragraph 372, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

373. As to Paragraph 373, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

374. As to Paragraph 374, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

375. As to Paragraph 375, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is

required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

376. As to Paragraph 376, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

377. As to Paragraph 377, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the

conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

378. As to Paragraph 378, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial."

379. As to Paragraph 379, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the

allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

380. As to Paragraph 380, Defendant denies the allegations therein at all times prior to January 2017 and lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein at all times after January 2017, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the documents referred to therein for a complete and accurate description of their contents.

381. As to Paragraph 381, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

382. As to Paragraph 382, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is

required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

383. As to Paragraph 383, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein at all times prior to January 2017 and lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein at all times after January 2017, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full documents referred to therein for a complete and accurate description of their contents.

384. As to Paragraph 384, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial."

385. As to Paragraph 385, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein.

386. As to Paragraph 386, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant specifically denies the definition of "Trump Organization." While

that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein.

387. As to Paragraph 387, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein at all times prior to January 2017 and lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein at all times after January 2017, which, pursuant to CPLR 3018, "shall have the effect of a denial."

388. As to Paragraph 388, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant specifically denies the definition of "Trump Organization." While

that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

389. As to Paragraph 389, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

390. As to Paragraph 390, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

391. As to Paragraph 391, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy

the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

392. As to Paragraph 392, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

393. As to Paragraph 393, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal

identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

394. As to Paragraph 394, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

395. As to Paragraph 395, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant specifically denies the definition of "Trump Organization." While

that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

396. As to Paragraph 396, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein at all times prior to January 2017 and lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein at all times after January 2017, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full documents referred to therein for a complete and accurate description of their contents.

397. As to Paragraph 397, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR

3018, "shall have the effect of a denial." Defendant refers to the documents referred to therein for a complete and accurate description of their contents.

398. As to Paragraph 398, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant specifically denies the allegations contained in the exhibit cited therein, which was prepared by the Attorney General and represents the Attorney General's characterization of facts. Defendant refers to the documents referred to therein for a complete and accurate description of their contents.

399. As to Paragraph 399, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein.

400. As to Paragraph 400, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is

required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

401. As to Paragraph 401, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the documents referred to therein for a complete and accurate description of their contents.

402. As to Paragraph 402, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

403. As to Paragraph 403, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a

response is required, Defendant specifically denies the definition of “Trump Organization.” While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of “Trump Organization”, as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not “sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved”, and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

404. As to Paragraph 404, Defendant specifically denies the definition of “Trump Organization.” While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of “Trump Organization”, as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not “sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved”, and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

405. As to Paragraph 405, Defendant specifically denies the definition of “Trump Organization.” While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of “Trump Organization”, as used by

the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not “sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved”, and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, “shall have the effect of a denial.” Defendant refers to the full documents referred to therein for a complete and accurate description of their contents.

406. As to Paragraph 406, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant denies the allegations therein.

407. As to Paragraph 407, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

408. As to Paragraph 408, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a

response is required, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

409. As to Paragraph 409, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

410. As to Paragraph 410, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

411. As to Paragraph 411, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give

the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

412. As to Paragraph 412, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

413. As to Paragraph 413, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus

fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein at all times prior to January 2017 and lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein at all times after January 2017, which, pursuant to CPLR 3018, “shall have the effect of a denial.” Defendant refers to the full documents referred to therein for a complete and accurate description of their contents.

414. As to Paragraph 414, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein. Defendant refers to the full documents referred to therein for a complete and accurate description of their contents.

415. As to Paragraph 415, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant denies the allegations therein.

416. As to Paragraph 416, Defendant specifically denies the definition of “Trump Organization.” While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of “Trump Organization”, as used by

the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not “sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved”, and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

417. As to Paragraph 417, Defendant specifically denies the definition of “Trump Organization.” While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of “Trump Organization”, as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not “sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved”, and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

418. As to Paragraph 418, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney

General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein.

419. As to Paragraph 419, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant denies the allegations therein.

420. As to Paragraph 420, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant denies the allegations therein.

421. As to Paragraph 421, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant denies the allegations therein.

422. As to Paragraph 422, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the

discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

423. As to Paragraph 423, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

424. As to Paragraph 424, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a

response is required, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

425. As to Paragraph 425, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the documents referred to therein for a complete and accurate description of their contents.

426. As to Paragraph 426, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant denies the allegations therein.

427. As to Paragraph 427, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations

therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

428. As to Paragraph 428, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

429. As to Paragraph 429, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations

contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

430. As to Paragraph 430, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial."

431. As to Paragraph 431, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

432. As to Paragraph 432, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein at all times prior to January 2017 and lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein at all times after January 2017, which, pursuant to CPLR 3018, "shall have the effect of a denial."

433. As to Paragraph 433, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by

the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

434. As to Paragraph 434, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

435. As to Paragraph 435, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

436. As to Paragraph 436, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a

response is required, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

437. As to Paragraph 437, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant specifically denies the definition of “Trump Organization.” While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of “Trump Organization”, as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not “sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved”, and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

438. As to Paragraph 438, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

439. As to Paragraph 439, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is

required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant specifically denies the definition of “Trump Organization.” While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of “Trump Organization”, as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not “sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved”, and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

440. As to Paragraph 440, Defendant specifically denies the definition of “Trump Organization.” While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of “Trump Organization”, as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not “sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved”, and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

441. As to Paragraph 441, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is

required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial."

442. As to Paragraph 442, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations

therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

443. As to Paragraph 443, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant specifically denies the definition of “Trump Organization.” While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of “Trump Organization”, as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not “sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved”, and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

444. As to Paragraph 444, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant specifically denies the definition of “Trump Organization.” While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of “Trump Organization”, as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the

conduct alleged is attributed. Such pleading is not “sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved”, and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

445. As to Paragraph 445, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant specifically denies the definition of “Trump Organization.” While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of “Trump Organization”, as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not “sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved”, and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

446. As to Paragraph 446, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or

Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

447. As to Paragraph 447, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

448. As to Paragraph 448, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant specifically denies the allegations contained in the exhibit cited therein, which was prepared by the Attorney General and represents the Attorney General's characterization of facts. Defendant refers to the full documents referred to therein for a complete and accurate description of their contents.

449. As to Paragraph 449, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such

exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein.

450. As to Paragraph 450, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

451. As to Paragraph 451, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a

response is required, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

452. As to Paragraph 452, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

453. As to Paragraph 453, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the

conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

454. As to Paragraph 454, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

455. As to Paragraph 455, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

456. As to Paragraph 456, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

457. As to Paragraph 457, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

458. As to Paragraph 458, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney

General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

459. As to Paragraph 459, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

460. As to Paragraph 460, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations

therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

461. As to Paragraph 461, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

462. As to Paragraph 462, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

463. As to Paragraph 463, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a

response is required, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

464. As to Paragraph 464, Defendant denies the allegations therein at all times prior to January 2017 and lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein at all times after January 2017, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full documents referred to therein for a complete and accurate description of their contents.

465. As to Paragraph 465, Defendant denies the allegations therein at all times prior to January 2017 and lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein at all times after January 2017, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full documents referred to therein for a complete and accurate description of their contents.

466. As to Paragraph 466, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR

3018, "shall have the effect of a denial." Defendant refers to the documents referred to therein for a complete and accurate description of their contents.

467. As to Paragraph 467, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

468. As to Paragraph 468, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus

fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

469. As to Paragraph 469, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the documents referred to therein for a complete and accurate description of their contents.

470. As to Paragraph 470, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant specifically denies the allegations contained in the exhibit cited therein, which was prepared by the Attorney General and represents the Attorney General's characterization of facts.

471. As to Paragraph 471, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy

the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein.

472. As to Paragraph 472, Defendant denies the allegations therein at all times prior to January 2017 and lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein at all times after January 2017, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full documents referred to therein for a complete and accurate description of their contents.

473. As to Paragraph 473, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

474. As to Paragraph 474, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy

the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

475. As to Paragraph 475, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

476. As to Paragraph 476, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

477. As to Paragraph 477, Defendant specifically denies the definition of “Trump Organization.” While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of “Trump Organization”, as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not “sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved”, and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations

contained therein, which, pursuant to CPLR 3018, “shall have the effect of a denial.” Defendant refers to the full documents referred to therein for a complete and accurate description of their contents.

478. As to Paragraph 478, Defendant specifically denies the definition of “Trump Organization.” While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of “Trump Organization”, as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not “sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved”, and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, “shall have the effect of a denial.” Defendant refers to the full documents referred to therein for a complete and accurate description of their contents.

479. As to Paragraph 479, Defendant specifically denies the definition of “Trump Organization.” While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of “Trump Organization”, as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not “sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved”, and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant lacks

sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full documents referred to therein for a complete and accurate description of their contents.

480. As to Paragraph 480, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

481. As to Paragraph 481, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the documents referred to therein for a complete and accurate description of their contents.

482. As to Paragraph 482, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the

discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

483. As to Paragraph 483, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full documents referred to therein for a complete and accurate description of their contents.

484. As to Paragraph 484, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or

Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full documents referred to therein for a complete and accurate description of their contents.

485. As to Paragraph 485, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the documents referred to therein for a complete and accurate description of their contents.

486. As to Paragraph 486, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full documents referred to therein for a complete and accurate description of their contents.

487. As to Paragraph 487, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

488. As to Paragraph 488, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy

the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

489. As to Paragraph 489, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

490. As to Paragraph 490, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus

fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

491. As to Paragraph 491, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

492. As to Paragraph 492, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the

conduct alleged is attributed. Such pleading is not “sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved”, and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

493. As to Paragraph 493, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant specifically denies the definition of “Trump Organization.” While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of “Trump Organization”, as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not “sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved”, and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

494. As to Paragraph 494, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such

exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

495. As to Paragraph 495, Defendant denies the allegations therein, except Defendant admits only that a press conference was held.

496. As to Paragraph 496, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

497. As to Paragraph 497, Defendant specifically denies the definition of “Trump Organization.” While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of “Trump Organization”, as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not “sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved”, and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein. Defendant specifically denies the allegations contained in the chart therein, which was prepared by the Attorney General and represents the Attorney General's characterizations of facts. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

498. As to Paragraph 498, Defendant specifically denies the definition of “Trump Organization.” While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of “Trump Organization”, as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not “sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved”, and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

499. As to Paragraph 499, Defendant specifically denies the definition of “Trump Organization.” While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of “Trump Organization”, as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not “sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved”, and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

500. As to Paragraph 500, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

501. As to Paragraph 501, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by

the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

502. As to Paragraph 502, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

503. As to Paragraph 503, Defendant specifically denies the definition of "Trump Organization". While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the

discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents. Except Defendant admits only Trump National Golf Club Colts Neck LLC purchased TNGC Colts Neck.

504. As to Paragraph 504, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

505. As to Paragraph 505, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

506. As to Paragraph 506, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

507. As to Paragraph 507, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

508. As to Paragraph 508, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant specifically denies the definition of "Trump Organization". While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

509. As to Paragraph 509, Defendant specifically denies the definitions of "Trump Organization" and "Defendants." While the shorthand "Trump Organization" is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization" and "Defendants," as used by the Attorney General, improperly group Defendants together, without regard to the nature or discrete legal identity of

each Defendant, and fail to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

510. As to Paragraph 510, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant specifically denies the definitions of "Trump Organization" and "Defendants." While the shorthand "Trump Organization" is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization" and "Defendants," as used by the Attorney General, improperly group Defendants together, without regard to the nature or discrete legal identity of each Defendant, and fail to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

511. As to Paragraph 511, Defendant specifically denies the definition of "Trump Organization". While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or

Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein. Defendant refers to the full documents referred to therein for a complete and accurate description of their contents.

512. As to Paragraph 512, Defendant specifically denies the definition of "Trump Organization". While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein. Defendant refers to the full documents referred to therein for a complete and accurate description of their contents.

513. As to Paragraph 513, Defendant specifically denies the definition of "Trump Organization". While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the

allegations therein. Defendant refers to the full documents referred to therein for a complete and accurate description of their contents.

514. As to Paragraph 514, Defendant specifically denies the definition of "Trump Organization". While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

515. As to Paragraph 515, denies the allegations therein. Except admits only that TNGC Pine Hill LLC purchased a ground lease interest in TNGC Philadelphia. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

516. As to Paragraph 516, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant denies the allegations therein. Defendant refers to the full documents referred to therein for a complete and accurate description of their contents.

517. As to Paragraph 517, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is

required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant denies the allegations therein. Defendant refers to the full documents referred to therein for a complete and accurate description of their contents.

518. As to Paragraph 518, Defendant specifically denies the definition of "Trump Organization". While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies each and every allegation contained therein at all times prior to January 2017 and lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein at all times after January 2017, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full documents referred to therein for a complete and accurate descriptions of their contents.

519. As to Paragraph 519, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant specifically denies the definitions of "Trump Organization" and "Defendants." While the shorthand "Trump Organization" is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization" and "Defendants," as used by the Attorney General, improperly group Defendants

together, without regard to the nature or discrete legal identity of each Defendant, and fail to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein. Defendant refers to the full documents referred to therein for a complete and accurate description of their contents.

520. As to Paragraph 520, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant specifically denies the definitions of "Trump Organization" and "Defendants." While the shorthand "Trump Organization" is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization" and "Defendants," as used by the Attorney General, improperly group Defendants together, without regard to the nature or discrete legal identity of each Defendant, and fail to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein. Defendant refers to the full documents referred to therein for a complete and accurate description of their contents.

521. As to Paragraph 521, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant specifically denies the definition of "Trump Organization". While

that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial."

522. As to Paragraph 522, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant specifically denies the definition of "Trump Organization". While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein. Defendant refers to the full documents referred to therein for a complete and accurate description of their contents.

523. As to Paragraph 523, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

524. As to Paragraph 524, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant denies the allegations therein. Defendant refers to the full documents referred to therein for a complete and accurate description of their contents.

525. As to Paragraph 525, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full documents referred to therein for a complete and accurate description of their contents.

526. As to Paragraph 526, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant denies the allegations therein. Defendant refers to the full documents referred to therein for a complete and accurate description of their contents.

527. As to Paragraph 527, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant specifically denies the definitions of "Trump Organization" and

"Defendants." While the shorthand "Trump Organization" is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization" and "Defendants," as used by the Attorney General, improperly group Defendants together, without regard to the nature or discrete legal identity of each Defendant, and fail to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein. Defendant refers to the full documents referred to therein for a complete and accurate description of their contents.

528. As to Paragraph 528, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant denies the allegations therein. Defendant refers to the full documents referred to therein for a complete and accurate description of their contents.

529. As to Paragraph 529, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant specifically denies the definitions of "Trump Organization" and "Defendants." While the shorthand "Trump Organization" is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization" and "Defendants," as used by the Attorney General, improperly group Defendants together, without regard to the nature or discrete legal identity of each Defendant, and fail to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading

is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein. Defendant refers to the full documents referred to therein for a complete and accurate description of their contents.

530. As to Paragraph 530, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant specifically denies the definition of "Trump Organization". While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full documents referred to therein for a complete and accurate description of their contents.

531. As to Paragraph 531, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant specifically denies the definition of "Trump Organization". While that shorthand is utilized by Defendants for branding and business purposes, no entity as such

exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein. Defendant refers to the full documents referred to therein for a complete and accurate description of their contents.

532. As to Paragraph 532, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

533. As to Paragraph 533, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant specifically denies the definitions of "Trump Organization" and "Defendants." While the shorthand "Trump Organization" is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization" and "Defendants," as used by the Attorney General, improperly group Defendants together, without regard to the nature or discrete legal identity of each Defendant, and fail to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013.

Otherwise, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

534. As to Paragraph 534, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant specifically denies the definitions of "Trump Organization" and "Defendants." While the shorthand "Trump Organization" is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization" and "Defendants," as used by the Attorney General, improperly group Defendants together, without regard to the nature or discrete legal identity of each Defendant, and fail to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

535. As to Paragraph 535, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant specifically denies the definitions of "Trump Organization" and "Defendants." While the shorthand "Trump Organization" is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization" and "Defendants," as used by the Attorney General, improperly group Defendants together, without regard to the nature or discrete legal identity of each Defendant, and fail to

specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

536. As to Paragraph 536, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant specifically denies the definitions of "Trump Organization" and "Defendants." While the shorthand "Trump Organization" is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization" and "Defendants," as used by the Attorney General, improperly group Defendants together, without regard to the nature or discrete legal identity of each Defendant, and fail to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

537. As to Paragraph 537, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant specifically denies the definitions of "Trump Organization" and "Defendants." While the shorthand "Trump Organization" is utilized by Defendants for branding

and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization" and "Defendants," as used by the Attorney General, improperly group Defendants together, without regard to the nature or discrete legal identity of each Defendant, and fail to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

538. As to Paragraph 538, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents. Except Defendant admits only that TNGC Dutchess County LLC purchased a ground lease interest in TNGC Hudson Valley.

539. As to Paragraph 539, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant denies the allegations therein. Defendant refers to the full documents referred to therein for a complete and accurate description of their contents.

540. As to Paragraph 540, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a

response is required, Defendant denies the allegations therein. Defendant refers to the full documents referred to therein for a complete and accurate description of their contents.

541. As to Paragraph 541, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant specifically denies the definition of "Trump Organization". While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies each and every allegation contained therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

542. As to Paragraph 542, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant specifically denies the definition of "Trump Organization". While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the

conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies each and every allegation contained therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

543. As to Paragraph 543, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant specifically denies the definition of "Trump Organization". While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies each and every allegation contained therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

544. As to Paragraph 544, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant specifically denies the definition of "Trump Organization". While that shorthand is utilized by Defendants for branding and business purposes, no entity as such

exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies each and every allegation contained therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

545. As to Paragraph 545, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

546. As to Paragraph 546, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full documents referred to therein for a complete and accurate description of their contents.

547. As to Paragraph 547, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full documents referred to therein for a complete and accurate description of their contents.

548. As to Paragraph 548, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR

3018, "shall have the effect of a denial." Defendant refers to the full documents referred to therein for a complete and accurate description of their contents.

549. As to Paragraph 549, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein.

550. As to Paragraph 550, denies the allegations therein. Defendant refers to the full documents referred to therein for a complete and accurate description of their contents.

551. As to Paragraph 551, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney

General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein. Defendant refers to the full documents referred to therein for a complete and accurate description of their contents.

552. As to Paragraph 552, Defendant specifically denies the allegations contained in the chart cited therein, which was prepared by the Attorney General and represents the Attorney General's characterizations of facts.

553. As to Paragraph 553, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full transcript embodying the statements quoted therein for a complete and accurate description of its contents.

554. As to Paragraph 554, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial."

555. As to Paragraph 555, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such

exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein. Defendant refers to the full documents referred to therein for a complete and accurate description of their contents.

556. As to Paragraph 556, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial."

557. As to Paragraph 557, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is

required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein. Defendant refers to the full documents referred to therein for a complete and accurate description of their contents.

558. As to Paragraph 558, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Defendant refers to the full documents referred to therein for a complete and accurate description of their contents.

559. As to Paragraph 559, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a

response is required, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein. Defendant refers to the full documents referred to therein for a complete and accurate description of their contents.

560. As to Paragraph 560, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein. Defendant refers to the full documents referred to therein for a complete and accurate description of their contents.

561. As to Paragraph 561, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein. Defendant refers to the full documents referred to therein for a complete and accurate description of their contents.

562. As to Paragraph 562, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant

refers to the full documents referred to therein for a complete and accurate description of their contents. Except Defendant admits only that Defendant had a relationship with Deutsche Bank.

563. As to Paragraph 563, Defendant specifically denies the definitions of "Trump Organization" and "Defendants." While the shorthand "Trump Organization" is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization" and "Defendants," as used by the Attorney General, improperly group Defendants together, without regard to the nature or discrete legal identity of each Defendant, and fail to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein. Defendant refers to the full documents referred to therein for a complete and accurate description of their contents. Except Defendant admits only that a relationship existed with Deutsche Bank.

564. As to Paragraph 564, denies the allegations therein. Defendant refers to the full documents referred to therein for a complete and accurate description of their contents.

565. As to Paragraph 565, denies the allegations therein. Defendant refers to the full documents referred to therein for a complete and accurate description of their contents.

566. As to Paragraph 566, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full documents quoted therein for a complete and accurate description of their contents.

567. As to Paragraph 567, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein. Defendant refers to the full documents referred to therein for a complete and accurate description of their contents.

568. As to Paragraph 568, denies the allegations therein. Defendant refers to the full documents referred to therein for a complete and accurate description of their contents.

569. As to Paragraph 569, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations

therein. Defendant refers to the full documents referred to therein for a complete and accurate description of their contents.

570. As to Paragraph 570, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein. Defendant refers to the full documents referred to therein for a complete and accurate description of their contents.

571. As to Paragraph 571, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its

contents. Except Defendant admits only that Trump Endeavor 12 LLC executed a purchase and sale agreement for Doral Golf Resort and Spa as part of a bankruptcy proceeding, and one of the entities included within the definition of the Trump Organization served as a stalking horse bidder for the Doral property in a bankruptcy auction.

572. As to Paragraph 572, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full documents referred to therein for a complete and accurate description of their contents.

573. As to Paragraph 573, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Except Defendant admits only that Defendant was involved in discussions with Deutsche Bank relating to financing for the purchase of the Doral property in or about 2011.

574. As to Paragraph 574, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document quoted therein for a complete and accurate description of its contents. Except Defendant admits only that Defendant was involved in discussions with Deutsche Bank relating to financing for the purchase of the Doral property in or about 2011.

575. As to Paragraph 575, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by

the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

576. As to Paragraph 576, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents. Except Defendant admits only that meetings took place with Deutsche Bank representatives in connection with Doral financing in or about 2011.

577. As to Paragraph 577, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents. Except Defendant admits only that Deutsche Bank provided a term sheet in or about December of 2011.

578. As to Paragraph 578, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

579. As to Paragraph 579, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

580. As to Paragraph 580, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

581. As to Paragraph 581, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

582. As to Paragraph 582, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

583. As to Paragraph 583, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

584. As to Paragraph 584, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

585. As to Paragraph 585, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained

therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

586. As to Paragraph 586, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

587. As to Paragraph 587, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents. Except Defendant admits only that Trump Endeavor 12 LLC closed on the Doral loan with Deutsche Bank.

588. As to Paragraph 588, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents. Except Defendant admits only that Trump Endeavor 12 LLC entered into a loan agreement and Statements of Financial Condition were provided to the bank.

589. As to Paragraph 589, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents. Except Defendant admits only that Trump Endeavor 12 LLC entered into a loan agreement.

590. As to Paragraph 590, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents. Except Defendant admits only that Trump Endeavor 12 LLC entered into a loan agreement.

591. As to Paragraph 591, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

592. As to Paragraph 592, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein. Except Defendant admits only that the Guaranty exists and refers to the full document referred to therein for a complete and accurate description of its contents.

593. As to Paragraph 593, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the

allegations therein. Except Defendant admits only that the Guaranty exists and refers to the full document referred to therein for a complete and accurate description of its contents.

594. As to Paragraph 594, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Except Defendant admits only that the quoted loan agreement exists and refers to the full document referred to therein for a complete and accurate description of its contents.

595. As to Paragraph 595, Defendant denies the allegations therein at all times prior to January 2017 and lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein at all times after January 2017, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full documents referred to therein for a complete and accurate description of their contents. Except Defendant admits only and generally that Statements of Financial Condition were submitted to Deutsche Bank.

596. As to Paragraph 596, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents. Except Defendant admits only that the Doral guaranty was amended in or about August 2013.

597. As to Paragraph 597, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full documents referred to therein

for a complete and accurate description of their contents. Except Defendant admits only and generally that Statements of Financial Condition were submitted for the years in question.

598. As to Paragraph 598, Defendant specifically denies the definition of “Trump Organization.” While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of “Trump Organization”, as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not “sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved”, and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, “shall have the effect of a denial.” Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

599. As to Paragraph 599, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents. Except Defendant admits only and generally that the Statements of Financial Condition were submitted for the relevant years.

600. As to Paragraph 600, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by

the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

601. As to Paragraph 601, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

602. As to Paragraph 602, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR

3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

603. As to Paragraph 603, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

604. As to Paragraph 604, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

605. As to Paragraph 605, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

606. As to Paragraph 606, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Except Defendant admits only that the Trump Chicago loan exists and refers to the full document referred to therein for a complete and accurate description of its contents.

607. As to Paragraph 607, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR

3018, "shall have the effect of a denial." Except Defendant admits only that the Trump Chicago loan exists and refers to the full document referred to therein for a complete and accurate description of its contents.

608. As to Paragraph 608, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Except Defendant admits only that the Trump Chicago loans exist and refers to the full documents referred to therein for a complete and accurate description of their contents.

609. As to Paragraph 609, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Except Defendant admits only that the Trump Chicago loans exist and refers to the full documents referred to therein for a complete and accurate description of their contents.

610. As to Paragraph 610, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Except Defendant admits only that the guaranty exists and refers to the full document referred to therein for a complete and accurate description of its contents.

611. As to Paragraph 611, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Except Defendant admits only that the guaranty exists

and refers to the full document referred to therein for a complete and accurate description of its contents.

612. As to Paragraph 612, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Except Defendant admits only that the guaranty exists and refers to the full document referred to therein for a complete and accurate description of its contents.

613. As to Paragraph 613, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial."

614. As to Paragraph 614, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Except Defendant admits only that payments were made on the Trump Chicago loan and refers to the full document referred to therein for a complete and accurate description of its contents.

615. As to Paragraph 615, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

616. As to Paragraph 616, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

617. As to Paragraph 617, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

618. As to Paragraph 618, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR

3018, "shall have the effect of a denial." Except Defendant admits only that the Trump Chicago loan documents were amended in or around May 2014 and refers to the full document referred to therein for a complete and accurate description of its contents.

619. As to Paragraph 619, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

620. As to Paragraph 620, Defendant denies the allegations therein. Except Defendant admits only that Statements of Financial Condition were submitted in connection with the Trump Chicago loans for the years referenced and refers to the full document referred to therein for a complete and accurate description of its contents.

621. As to Paragraph 621, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by

the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial."

622. As to Paragraph 622, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Except Defendant admits only that Trump Old Post Office LLC obtained the right to redevelop the Old Post Office property as the result of a competitive bidding process run by the U.S. General Services Administration ("GSA"), which included evaluation based on a set of specific criteria and refers to the full document referred to therein for a complete and accurate description of its contents.

623. As to Paragraph 623, Defendant denies the allegations therein. Except Defendant admits only that financial capacity was one among several factors which GSA stated would be a factor in the selection process.

624. As to Paragraph 624, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

625. As to Paragraph 625, Defendant denies the allegations therein, Except Defendant admits only that Mr. Trump and Ivanka Trump had roles in the Old Post Office property bidding process.

626. As to Paragraph 626, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Except Defendant admits only that Trump Old Post Office LLC was selected by GSA to redevelop the Old Post Office property. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

627. As to Paragraph 627, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Except Defendant admits only that Trump Old Post Office LLC reached out to Deutsche Bank about financing the Old Post Office project and refers to the full document referred to therein for a complete and accurate description of its contents.

628. As to Paragraph 628, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant

refers to the full document referred to therein for a complete and accurate description of its contents.

629. As to Paragraph 629, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial."

630. As to Paragraph 630, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant

refers to the full document referred to therein for a complete and accurate description of its contents.

631. As to Paragraph 631, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

632. As to Paragraph 632, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

633. As to Paragraph 633, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

634. As to Paragraph 634, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

635. As to Paragraph 635, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Except Defendant admits only that the OPO loan existed and refers to the full document referred to therein for a complete and accurate description of its contents.

636. As to Paragraph 636, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Except Defendant admits only that the OPO loan existed and refers to the full document referred to therein for a complete and accurate description of its contents.

637. As to Paragraph 637, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Except Defendant admits only that the OPO loan existed and refers to the full document referred to therein for a complete and accurate description of its contents.

638. As to Paragraph 638, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Except Defendant admits only that a guaranty existed in connection with the OPO loan and refers to the full document referred to therein for a complete and accurate description of its contents.

639. As to Paragraph 639, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

640. As to Paragraph 640, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Except Defendant admits only that a guaranty existed in connection with the OPO loan and refers to the full document referred to therein for a complete and accurate description of its contents.

641. As to Paragraph 641, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant denies the allegations therein. Except Defendant admits only that a guaranty existed in connection with the OPO loan and refers to the full document referred to therein for a complete and accurate description of its contents.

642. As to Paragraph 642, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Except Defendant admits only that a guaranty existed in connection with the OPO loan and refers to the full document referred to therein for a complete and accurate description of its contents.

643. As to Paragraph 643, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Except Defendant admits only that a guaranty existed in connection with the OPO loan and refers to the full document referred to therein for a complete and accurate description of its contents.

644. As to Paragraph 644, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial."

645. As to Paragraph 645, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Except that Defendant admits only that the Old Post Office loan was disbursed over time according to draws and refers to the full document referred to therein for a complete and accurate description of its contents.

646. As to Paragraph 646, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Defendant lacks sufficient

knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial."

647. As to Paragraph 647, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents. Except Defendant admits only that 40 Wall Street LLC obtained financing from Capital One for the property located 40 Wall Street, New York, NY in November of 2015.

648. As to Paragraph 648, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full documents referred to therein for a complete and accurate description of their contents.

649. As to Paragraph 649, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the

discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

650. As to Paragraph 650, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Except Defendant admits only that Ladder Capital issued a mortgage for 40 Wall Street and refers to the full document referred to therein for a complete and accurate description of its contents.

651. As to Paragraph 651, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by

the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

652. As to Paragraph 652, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

653. As to Paragraph 653, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

654. As for Paragraph 654, Defendant denies the allegations therein. Except Defendant admits only that Seven Springs LLC took out a loan from Royal Bank America in or about 2000.

655. As to Paragraph 655, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Except that Defendant admits only that certain Statements

of Financial Condition were submitted in connection with the Seven Springs Mortgage and refers to the full document referred to therein for a complete and accurate description of its contents.

656. As to Paragraph 656, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Except that Defendant admits only that certain Statements of Financial Condition were submitted in connection with the Seven Springs Mortgage and refers to the full document referred to therein for a complete and accurate description of its contents.

657. As to Paragraph 657, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Except that Defendant admits only that certain Statements of Financial Condition were submitted in connection with the Seven Springs Mortgage and refers to the full document referred to therein for a complete and accurate description of its contents.

658. As to Paragraph 658, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy

the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

659. As to Paragraph 659, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Except that Defendant admits only that certain Statements of Financial Condition were submitted in connection with the Seven Springs Mortgage and refers to the full document referred to therein for a complete and accurate description of its contents.

660. As to Paragraph 660, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Except Defendant admits only that a personal guaranty was provided in connection with Seven Springs financing and refers to the full document referred to therein for a complete and accurate description of its contents.

661. As to Paragraph 661, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

662. As to Paragraph 662, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the

discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

663. As to Paragraph 663, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

664. As to Paragraph 664, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR

3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

665. As to Paragraph 665, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

666. As to Paragraph 666, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

667. As to Paragraph 667, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the

discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Except Defendant admits only that he submitted a bid to purchase the Buffalo Bills football team in or about July 2014 and refers to the full document referred to therein for a complete and accurate description of its contents.

668. As to Paragraph 668, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Except Defendant admits only that discussions took place in or about 2014 with Deutsche Bank in connection with a potential purchase of the Buffalo Bills football team and refers to the full document referred to therein for a complete and accurate description of its contents.

669. As to Paragraph 669, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Except Defendant admits only that discussions took place in or about 2014 with Deutsche Bank in connection with a potential purchase of the Buffalo Bills football team and refers to the full document referred to therein for a complete and accurate description of its contents.

670. As to Paragraph 670, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

671. As to Paragraph 671, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

672. As to Paragraph 672, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

673. As to Paragraph 673, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

674. As to Paragraph 674, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant

refers to the full document referred to therein for a complete and accurate description of its contents.

675. As to Paragraph 675, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

676. As to Paragraph 676, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof.

677. As to Paragraph 677, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant specifically denies the definitions of "Trump Organization" and "Defendants." While the shorthand "Trump Organization" is utilized by Defendants for branding

and business purposes, no entity as such exists for legal purposes. The definitions of “Trump Organization” and “Defendants,” as used by the Attorney General, improperly group Defendants together, without regard to the nature or discrete legal identity of each Defendant, and fail to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not “sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved”, and thus fails to satisfy the basic pleading requirements of CPLR 3013. Defendant refers to the full documents referred to therein for a complete and accurate description of their contents.

678. As to Paragraph 678, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

679. As to Paragraph 679, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by

the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

680. As to Paragraph 680, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

681. As to Paragraph 681, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes,

no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Except Defendant admits only that a General Indemnity Agreement exists and refers to the full document referred to therein for a complete and accurate description of its contents.

682. As to Paragraph 682, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

683. As to Paragraph 683, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

684. As to Paragraph 684, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

685. As to Paragraph 685, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

686. As to Paragraph 686, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

687. As to Paragraph 687, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

688. As to Paragraph 688, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

689. As to Paragraph 689, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

690. As to Paragraph 690, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which,

pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

691. As to Paragraph 691, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

692. As to Paragraph 692, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

693. As to Paragraph 693, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes,

no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

694. As to Paragraph 694, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which,

pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

695. As to Paragraph 695, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

696. As to Paragraph 696, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

697. As to Paragraph 697, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the

discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

698. As to Paragraph 698, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

699. As to Paragraph 699, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by

the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

700. As to Paragraph 700, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

701. As to Paragraph 701, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes,

no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents. Except Defendant admits only that an investigation by the OAG was ongoing which received widespread and frequent international news coverage.

702. As to Paragraph 702, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its

contents. Except Defendant admits only that an investigation by the OAG was ongoing which received widespread and frequent international news coverage.

703. As to Paragraph 703, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Except Defendant admits only that an investigation by the OAG was ongoing which received widespread and frequent international news coverage.

704. As to Paragraph 704, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

705. As to Paragraph 705, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

706. As to Paragraph 706, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

707. As to Paragraph 707, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

708. As to Paragraph 708, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

709. As to Paragraph 709, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy

the basic pleading requirements of CPLR 3013. Otherwise, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

710. As to Paragraph 710, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial."

711. As to Paragraph 711, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

712. As to Paragraph 712, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by

the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

713. As to Paragraph 713, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial."

714. As to Paragraph 714, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full documents referred to therein for a complete and accurate description of their contents.

715. As to Paragraph 715, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is

required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant denies the allegations therein.

716. As to Paragraph 716, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant denies the allegations therein.

717. As to Paragraph 717, Defendant denies the allegations therein. Except Defendant admits only that he exercised his right under the 5th Amendment of the U.S. Constitution not to be a witness against himself.

718. As to Paragraph 718, Defendant denies the allegations therein. Except Defendant admits only that he exercised his right under the 5th Amendment of the U.S. Constitution not to be a witness against himself.

719. As to Paragraph 719, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant denies the allegations therein.

720. As to Paragraph 720, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such

exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein.

721. As to Paragraph 721, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein.

722. As to Paragraph 722, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant specifically denies the definition of "Trump Organization." While

that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein. Except Defendant admits only that there was a shared business calendar with various dates.

723. As to Paragraph 723, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

724. As to Paragraph 724, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by

the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein. Defendant specifically denies the allegations contained in the exhibit cited therein, which was prepared by the Attorney General and represents the Attorney General's characterizations of facts. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

725. As to Paragraph 725, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant denies the allegations therein. Defendant refers to the full documents referred to therein for a complete and accurate description of their contents.

726. As to Paragraph 726, Defendant denies the allegations therein.

727. As to Paragraph 727, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial."

728. As to Paragraph 728, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial."

729. As to Paragraph 729, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial."

730. As to Paragraph 730, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant denies the allegations therein.

731. As to Paragraph 731, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

732. As to Paragraph 732, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

733. As to Paragraph 733, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

734. As to Paragraph 734, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a

response is required, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

735. As to Paragraph 735, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

736. As to Paragraph 736, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

737. As to Paragraph 737, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

738. As to Paragraph 738, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

739. As to Paragraph 739, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

740. As to Paragraph 740, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

741. As to Paragraph 741, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

742. As to Paragraph 742, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

743. As to Paragraph 743, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant denies the allegations therein.

744. As to Paragraph 744, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, which, pursuant to CPLR 3018, "shall have the effect of a denial." Defendant

refers to the full document referred to therein for a complete and accurate description of its contents.

745. As to Paragraph 745, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

746. As to Paragraph 746, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the

conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

747. As to Paragraph 747, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Otherwise, Defendant denies the allegations therein. Defendant refers to the full document referred to therein for a complete and accurate description of its contents.

AS AND FOR A RESPONSE TO THE FIRST CAUSE OF ACTION

748. As to Paragraph 748, Defendant repeats, reiterates and realleges each and every response made in paragraphs "1" through "747" as if more fully set forth herein.

749. As to Paragraph 749, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof.

750. As to Paragraph 750, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant denies the allegations therein.

751. As to Paragraph 751, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof.

752. As to Paragraph 752, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof.

753. As to Paragraph 753, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof.

754. As to Paragraph 754, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof.

755. As to Paragraph 755, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is

required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant denies the allegations therein.

756. As to Paragraph 756, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant denies the allegations therein.

757. As to Paragraph 757, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant denies the allegations therein.

758. As to Paragraph 758, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant denies the allegations therein.

759. As to Paragraph 759, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant specifically denies the definition of "Trump Organization." While that shorthand is utilized by Defendants for branding and business purposes, no entity as such exists for legal purposes. The definitions of "Trump Organization", as used by the Attorney General, improperly groups all entity Defendants together, without regard to the discrete legal identity of each Defendant, and fails to specify to which named Defendant or Defendants the

conduct alleged is attributed. Such pleading is not "sufficiently particular to give the court and parties notice of the transactions [or] occurrences ... intended to be proved", and thus fails to satisfy the basic pleading requirements of CPLR 3013. Defendant denies the allegations therein.

760. As to Paragraph 760, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant denies the allegations therein. Except Defendant admits only that he exercised his right under the 5th Amendment of the U.S. Constitution not to be a witness against himself.

AS AND FOR A RESPONSE TO THE SECOND CAUSE OF ACTION

761. As to Paragraph 761, Defendant reasserts his answers to the paragraphs above as if fully stated herein.

762. As to Paragraph 762, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof.

763. As to Paragraph 763, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant denies the allegations therein.

764. As to Paragraph 764, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof.

765. As to Paragraph 765, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof.

766. As to Paragraph 766, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof.

767. As to Paragraph 767, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof.

768. As to Paragraph 768, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant denies the allegations therein.

769. As to Paragraph 769, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant denies the allegations therein.

770. As to Paragraph 770, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant denies the allegations therein.

771. As to Paragraph 771, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant denies the allegations therein.

772. As to Paragraph 772, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant denies the allegations therein.

773. As to Paragraph 773, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant denies the allegations therein.

AS AND FOR A RESPONSE TO THE THIRD CAUSE OF ACTION

774. As to Paragraph 774, Defendant reasserts his answers to the paragraphs above as if fully stated herein.

775. As to Paragraph 775, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof.

776. As to Paragraph 776, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant denies the allegations therein.

777. As to Paragraph 777, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof.

778. As to Paragraph 778, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof.

779. As to Paragraph 779, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof.

780. As to Paragraph 780, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant denies the allegations therein.

781. As to Paragraph 781, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant denies the allegations therein.

782. As to Paragraph 782, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant denies the allegations therein.

783. As to Paragraph 783, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant denies the allegations therein.

784. As to Paragraph 784, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant denies the allegations therein.

785. As to Paragraph 785, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant denies the allegations therein.

786. As to Paragraph 786, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant denies the allegations therein.

787. As to Paragraph 787, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant denies the allegations therein.

AS AND FOR A RESPONSE TO THE FOURTH CAUSE OF ACTION

788. As to Paragraph 788, Defendant repeats, reiterates and realleges each and every response made in paragraphs “1” through “787” as if more fully set forth herein.

789. As to Paragraph 789, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof.

790. As to Paragraph 790, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant denies the allegations therein.

791. As to Paragraph 791, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof.

792. As to Paragraph 792, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof.

793. As to Paragraph 793, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant denies the allegations therein.

794. As to Paragraph 794, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof.

795. As to Paragraph 795, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant denies the allegations therein.

796. As to Paragraph 796, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant denies the allegations therein.

797. As to Paragraph 797, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant denies the allegations therein.

798. As to Paragraph 798, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant denies the allegations therein.

799. As to Paragraph 799, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is

required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant denies the allegations therein.

AS AND FOR A RESPONSE TO THE FIFTH CAUSE OF ACTION

800. As to Paragraph 800, Defendant repeats, reiterates and realleges each and every response made in paragraphs “1” through “799” as if more fully set forth herein.

801. As to Paragraph 801, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof.

802. As to Paragraph 802, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant denies the allegations therein.

803. As to Paragraph 803, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof.

804. As to Paragraph 804, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof.

805. As to Paragraph 805, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof.

806. As to Paragraph 806, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant denies the allegations therein.

807. As to Paragraph 807, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant denies the allegations therein.

808. As to Paragraph 808, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant denies the allegations therein.

809. As to Paragraph 809, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant denies the allegations therein.

810. As to Paragraph 810, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant denies the allegations therein.

811. As to Paragraph 811, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant denies the allegations therein.

812. As to Paragraph 812, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant denies the allegations therein.

813. As to Paragraph 813, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant denies the allegations therein.

AS AND FOR A RESPONSE TO THE SIXTH CAUSE OF ACTION

814. As to Paragraph 814, Defendant repeats, reiterates and realleges each and every response made in paragraphs “1” through “813” as if more fully set forth herein.

815. As to Paragraph 815, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof.

816. As to Paragraph 816, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant denies the allegations therein.

817. As to Paragraph 817, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof.

818. As to Paragraph 818, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof.

819. As to Paragraph 819, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant denies the allegations therein.

820. As to Paragraph 820, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof.

821. As to Paragraph 821, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant denies the allegations therein.

822. As to Paragraph 822, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant denies the allegations therein.

823. As to Paragraph 823, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant denies the allegations therein.

824. As to Paragraph 824, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant denies the allegations therein.

825. As to Paragraph 825, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant denies the allegations therein.

AS AND FOR A RESPONSE TO THE SEVENTH CAUSE OF ACTION

826. As to Paragraph 826, Defendant repeats, reiterates and realleges each and every response made in paragraphs “1” through “825” as if more fully set forth herein.

827. As to Paragraph 827, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof.

828. As to Paragraph 828, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant denies the allegations therein.

829. As to Paragraph 829, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof.

830. As to Paragraph 830, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof.

831. As to Paragraph 831, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof.

832. As to Paragraph 832, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant denies the allegations therein.

833. As to Paragraph 833, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant denies the allegations therein.

834. As to Paragraph 834, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant denies the allegations therein.

835. As to Paragraph 835, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant denies the allegations therein.

836. As to Paragraph 836, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant denies the allegations therein.

837. As to Paragraph 837, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant denies the allegations therein.

838. As to Paragraph 838, the allegations contained therein state legal arguments or conclusions of law or mixed conclusions of law and fact to which no responsive pleading is required and as to which the Attorney General must meet her burden of proof. To the extent a response is required, Defendant denies the allegations therein.

GENERAL DENIAL

Except as otherwise expressly admitted in paragraphs 1 through 838 above, Defendant denies each and every allegation of paragraphs 1 through 838 of the Complaint, including without limitation, the headings and sub-headings contained in the Complaint, and the “Wherefore” paragraph, and Defendant specifically denies any liability to Plaintiff.

AFFIRMATIVE DEFENSES

As separate, additional defenses to the Complaint and the purported causes of action therein, but without assuming the burden of proof with regard to these defenses, Defendant alleges as follows:

AFFIRMATIVE DEFENSE I

The Attorney General fails to state a claim upon which relief can be granted.

AFFIRMATIVE DEFENSE II

Defendant has not engaged in repeated fraudulent or illegal acts or demonstrated persistent fraud or illegality in the carrying on, conducting, or transacting of business.

AFFIRMATIVE DEFENSE III

The Attorney General has failed to adequately allege that Defendant's conduct tended to deceive or create an atmosphere conducive to fraud under Executive Law § 63(12).

AFFIRMATIVE DEFENSE IV

The Attorney General has no subject matter jurisdiction under Executive Law § 63(12) over the conduct alleged.

AFFIRMATIVE DEFENSE V

The Attorney General has no authority, capacity, or standing to bring a claim under Executive Law § 63(12) based upon the facts alleged.

AFFIRMATIVE DEFENSE VI

The Attorney General has no authority to bring a claim under Executive Law § 63(12) because Plaintiff has not sustained cognizable harm by reason of the conduct alleged.

AFFIRMATIVE DEFENSE VII

The Attorney General has no authority to bring claims on behalf of private parties under Executive Law § 63(12) or any other statute.

AFFIRMATIVE DEFENSE VIII

The claims or causes of action for monetary damages and equitable relief alleged in the Complaint are barred because the persons on whose behalf the claims are asserted can obtain relief, to the extent they can prove any entitlement to damages or equitable relief, by exercising their private rights of action.

AFFIRMATIVE DEFENSE IX

The Court lacks subject matter jurisdiction over Plaintiff's claims.

AFFIRMATIVE DEFENSE X

Plaintiffs' claims are barred, in whole or in part, because the alleged damages, if any, are speculative and uncertain.

AFFIRMATIVE DEFENSE XI

Plaintiff is barred from obtaining disgorgement of profits from Defendant because all profits he earned are attributable to lawful conduct.

AFFIRMATIVE DEFENSE XII

Plaintiff is barred from obtaining disgorgement of profits from Defendant because any profits Plaintiff seeks are duplicative of other relief sought in this case.

AFFIRMATIVE DEFENSE XIII

Plaintiff is barred from obtaining disgorgement of profits from Defendant because disgorgement may not be imposed on a joint and several basis.

AFFIRMATIVE DEFENSE XIV

Plaintiff lacks authority to bar Defendant or any of the Defendants from applying for or obtaining loans or to otherwise interfere with their right to lawfully conduct business.

AFFIRMATIVE DEFENSE XV

Plaintiff lacks jurisdiction over Defendants to the extent they are not or are no longer residents of New York.

AFFIRMATIVE DEFENSE XVI

Plaintiff has no authority under Executive Law 63(12) to impose officer and director bars.

AFFIRMATIVE DEFENSE XVII

Plaintiff's claimed entitlement to the entry of a prospective injunction against Defendant is moot.

AFFIRMATIVE DEFENSE XVIII

Plaintiff's claims are barred, in whole or in part, by the applicable statute of limitations.

AFFIRMATIVE DEFENSE XIX

Plaintiff's claims are barred, in whole or in part, by the doctrines of waiver, acquiescence, laches and/or estoppel.

AFFIRMATIVE DEFENSE XX

The Attorney General in her conduct and public statements has acted contrary to the ancient and customary norms that prescribe the manner in which prosecutors are expected to conduct themselves under the rule of law.

AFFIRMATIVE DEFENSE XXI

Defendant has acted at all times in good faith and did not directly or indirectly induce the alleged wrongful acts, nor was Defendant a culpable participant in any of the alleged wrongdoing.

AFFIRMATIVE DEFENSE XXII

Plaintiff has not adequately pleaded that Defendant ever possessed any specific intent to defraud anyone.

AFFIRMATIVE DEFENSE XXIII

Plaintiff's claims are barred, in whole or in part, because Plaintiff's claimed injuries and damages were not legally or proximately caused by any acts or omissions of Defendant and/or were caused, if at all, by market factors, the conduct of third parties, or other factors over which

Defendant had no control.

AFFIRMATIVE DEFENSE XXIV

The transactions at issue in the Complaint were permissible when made pursuant to then applicable legal and accounting rules and regulations or such rules and regulations were unclear or insufficiently defined or subject to interpretation at the time the transactions were made.

AFFIRMATIVE DEFENSE XXV

Defendant's conduct was consistent with practices and norms that were customary and widespread throughout the industry at the time of the transactions alleged.

AFFIRMATIVE DEFENSE XXVI

The claims against Defendant are barred, in whole or in part, because there is no causal relationship between any statement Defendant is alleged to have made and Deutsche Bank's,

Ladder Capital Finance's, or Royal Bank America's decisions regarding the interest rates they would offer to a borrowing entity.

AFFIRMATIVE DEFENSE XXVII

Plaintiff's claims against Defendant are barred because neither Deutsche Bank, Ladder Capital Finance, Royal Bank America, Zurich North American, Everest National Insurance Company, nor Tokio Marine HCC are alleged to have suffered any damage, loss, or injury as a result of Defendant's conduct.

AFFIRMATIVE DEFENSE XXVIII

Plaintiff's claims against Defendant are barred because neither Deutsche Bank, Ladder Capital Finance, Royal Bank America, Zurich North American, Everest National Insurance Company, nor Tokio Marine HCC are alleged to have suffered any legally cognizable injury.

AFFIRMATIVE DEFENSE XXIX

Plaintiff's claims against Defendant are barred because, to the extent that Deutsche Bank, Ladder Capital Finance, Royal Bank America, Zurich North American, Everest National Insurance Company, or Tokio Marine HCC, incurred any injury or damages, which Defendant denies, any such injury or damages were caused and brought about by the acts, conduct, or omissions of others.

AFFIRMATIVE DEFENSE XXX

Defendant relied in good faith upon the advice of outside accountants and other professionals.

AFFIRMATIVE DEFENSE XXXI

Defendant relied in good faith upon information, opinions, reports, and statements presented by employees and other persons with professional and/or expert competence.

AFFIRMATIVE DEFENSE XXXII

Plaintiff's claims are barred, in whole or in part, because Defendant did not know, and in the exercise of reasonable care, could not have known of the purported omissions, untruths and/or misconduct alleged by Plaintiff.

AFFIRMATIVE DEFENSE XXXIII

Plaintiff has failed to plead with the requisite particularity.

AFFIRMATIVE DEFENSE XXXIV

Plaintiff has improperly grouped the named Defendants together.

AFFIRMATIVE DEFENSE XXXV

Plaintiff's claims are barred, in whole or in part, because the purported claims and the allegations upon which they are based are improperly vague, ambiguous, and confusing.

AFFIRMATIVE DEFENSE XXXVI

Plaintiff has failed to name indispensable parties.

AFFIRMATIVE DEFENSE XXXVII

The Donald J. Trump Revocable Trust is not a proper party to this litigation.

AFFIRMATIVE DEFENSE XXXVIII

Plaintiff's causes of action are barred by documentary evidence.

AFFIRMATIVE DEFENSE XXXIX

Plaintiff has failed to establish any basis of common enterprise liability, as Defendants have maintained separate corporate form from other named Defendants.

AFFIRMATIVE DEFENSE XL

Plaintiff's claims of conspiracy are barred by the intra-corporate conspiracy doctrine.

AFFIRMATIVE DEFENSE XLI

Defendant hereby reserves the right to assert all affirmative defenses available under any applicable federal and state law, and to assert any cross-claims, counterclaims and third-party claims when and if they become appropriate in this action.

AFFIRMATIVE DEFENSE XLII

Defendant presently has insufficient knowledge or information upon which to form a belief as to whether there may be, as yet unstated, affirmative defenses available to him, and therefore reserves the right to assert any and all additional defenses in the event that discovery indicates that such defenses would be appropriate.

AFFIRMATIVE DEFENSE XLIII

Defendant expressly reserves the right to amend and/or supplement his answer, defenses, and all other pleadings.

AFFIRMATIVE DEFENSE XLIV

Defendant hereby adopts by reference any and all other applicable defenses pleaded, or as yet unstated, by any other defendant to the extent that he may share in such defenses.

PRAYER FOR RELIEF

WHEREFORE, Defendant requests that the Court:

- (a) Dismiss the Complaint in its entirety with prejudice;
- (b) Decline to award the relief requested in the Complaint;
- (c) Award Defendants costs and expenses incurred in the defense of this action;
- (d) Enter judgment in favor of Defendant; and
- (e) Grant Defendant such other and further relief as the Court may deem proper.

Respectfully submitted this 26th day of January, 2023.

Dated: January 26, 2023
New York, NY



Alina Habba, Esq.
Habba Madaio & Associates LLP
1430 US Highway 206, Suite 240
Bedminster, NJ 07921

-and-

112 West 34th Street, 17th & 18th Floors
New York, New York 10120
(908) 869-1188 (Phone)
(908) 450-1881 (Fax)
ahabba@habbalaw.com

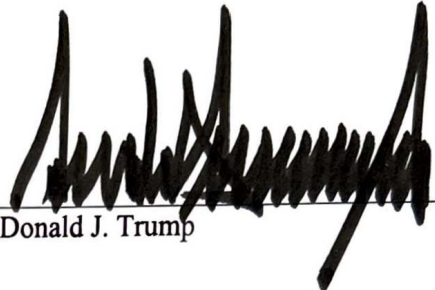
To: Kevin C. Wallace, Esq.
Andrew Amer, Esq.
Colleen K. Faherty, Esq.
Alex Finkelstein, Esq.
Wil Handley, Esq.
Eric R. Haren, Esq.
Louis M. Solomon, Esq.
Stephanie Torre, Esq.
Office of the New York State Attorney General
28 Liberty Street
New York, New York 10005

VERIFICATION

STATE OF FLORIDA)
) ss.:
COUNTY OF PALM BEACH)

Donald J. Trump, being duly sworn, says that deponent is a Defendant herein; that deponent has read the foregoing Verified Answer and knows the contents thereof and that the same is true to the best of deponent's own current knowledge, except as to the matters therein stated to be alleged upon information and belief, and that as to those matters deponent believes them to be true.

Dated: Palm Beach, Florida
January 26, 2023


Donald J. Trump

STATE OF FLORIDA, COUNTY OF PALM BEACH ss.:

On the 26th day of January, 2023, before me, the undersigned, personally appeared Donald J. Trump, personally known to me or proved to me on the basis of satisfactory evidence to be the individual whose name is subscribed to the within instrument and acknowledged to me that he executed the same in his capacity, and that by his signature on the instrument, the individual or the person upon behalf of whom the individual acted, executed the instrument.


Notary Public