

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

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IVANA TRUMP, :
 :
 Plaintiff, :
 :
 -against- : Index No. 72319/90
 :
 DONALD TRUMP, :
 :
 Defendant. :
-----X
STATE OF NEW YORK)
)
) ss.:
COUNTY OF NEW YORK)

IVANA TRUMP being duly sworn deposes and says:

1. I was the plaintiff in the above captioned action over 25 years ago. I submit this affidavit in opposition to the application made by The New York Times and Gaiette Company, Inc. (the "Press Movants") to unseal the records of my divorce case.

2. While my family and I have experienced public attention over the years, I am a private citizen. My family and I should not be made further subject to mass and unwarranted publicity, regarding ancient and extremely personal events, simply because the Press Movants wish to increase readership in their obvious attempt to impugn my ex-husband's reputation and create scandal.

3. The legal reasons requiring that the file of my divorce proceedings remain private are set forth in the accompanying affirmation of my attorney, Ira E. Garr. This affidavit amplifies my personal position.

4. In the mid-1980s my ex-husband, Donald Trump, was considered one of the most industrious entrepreneurs in the country. During that decade, we built the Trump Tower, acquired or built hotels and casinos in Atlantic City, acquired our Florida home, Mar-a-Lago, the former estate of Marjorie Merriweather Post and acquired The Plaza Hotel, one of the grand historic landmarks in New York City. As a result, we were often the subject of public interest.

5. Therefore, when I filed for divorce in 1990, our personal affairs became extremely public. The sensationalism of our private life was difficult and traumatic. Fortunately, Donald and I resolved the issues emanating from our divorce and moved forward.

6. Our divorce, and any litigation subsequent thereto, is decades old. Since then, our relationship has evolved from husband and wife and business partners to good friends and confidants. We are the parents of three wonderful children and eight grandchildren.

7. We are both proud of our children's accomplishments. We adore our two beautiful daughters-in-law and our wonderful and accomplished son-in-law. We are devoted to our family.

8. When we settled our divorce, Donald requested that we have a confidentiality clause whereby I would not discuss either the divorce or our marriage. I now recognize the purpose of this clause was to protect our family and its privacy.¹

¹ To the extent the Press Movants quote me commenting on my relationship with Donald, I have done so in complete compliance with the terms of our confidentiality agreement and Donald's consent.

9. The Appellate Court of this state affirmed the propriety of this confidentiality clause. We have abided by this mandate for over twenty-five years.

10. I do not want the details of our divorce (most of which have already been reported extensively) to be opened up and displayed to the general public for their misinterpretation and amusement. As stated above, Donald and I currently share a warm relationship and our family should not be forced to relive this part of our past because he is running for President.

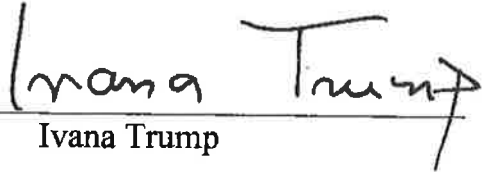
11. My attorney advises me that what may or may not have occurred ages ago during the dissolution of our marriage, has no bearing on the issues involved in the current presidential campaign. The voters will decide which of the candidates they believe is most qualified, capable, knowledgeable and deserving of holding the highest office in the country.

12. Both Donald and Mrs. Clinton are the subject of news stories every day. Both have been in the public eye for over thirty years. The American people have been provided with an abundance of information, both past and present, personal and professional alike, about both candidates from which they can assess their character and qualifications.

13. I am certain that the citizens voting in this election will decide which candidate they favor based upon their current observations of the candidates, their policies and their demeanor during speeches, interviews and the upcoming presidential debates.

14. I implore the court to keep what remains of my private life and that of my family's precisely that—private and confidential. My attorney advises me that the law requires that our divorce file remain sealed and the documents be kept confidential. My attorney further advises me that this is precisely what the Appellate Court held in its decision over twenty-five years ago.

WHEREFORE, for the reasons stated herein and in the accompanied affirmation of my attorney, Ira E. Garr, I respectfully request that the Court deny the Press Movants' application in its entirety and refuse to unseal the file of my divorce.


Ivana Trump

Sworn to before me this
9th day of September 2016


Notary Public

IRA E. GARR
Notary Public, State of New York
No. 4825767
Qualified in New York County
Commission Expires October 31, 2016