

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,)
)
 Plaintiff,)
)
 v.) CIVIL ACTION NO.
) 73 C 1529 (EN)
)
 FRED C. TRUMP, DONALD TRUMP)
 and TRUMP MANAGEMENT, INC.,)
)
 Defendants.)
 _____)

AFFIDAVIT

STATE OF NEW YORK)
) ss
 COUNTY OF NEW YORK)

I, ELYSE S. GOLDWEBER, being duly sworn do depose and say that:

1. I am presently employed as an examining attorney with the New York City Department of Investigation located at 111 John Street, New York, New York.

2. I was formerly employed as an attorney with the Civil Rights Division, Department of Justice, Washington, D. C. from September 19, 1972 until May 24, 1974.

3. While employed by the Department of Justice, I participated in the preparation and the pre-trial stage of United States v. Fred Trump, et al., Civil Action No. 73 C 1529 (EN).

4. Prior to the institution of the above-mentioned lawsuit, I interviewed Mr. Thomas Miranda who was formerly

employed by Trump Management, Inc. as a superintendent at Kendall Hall Apartments, 41-10 Bowne Street, Flushing, New York. The purpose of this interview was to determine what, if anything, Mr. Miranda knew about discriminatory practices on the part of Trump Management, Inc.

5. Mr. Miranda related to me that Mr. Hyman, Mrs. Williams & a woman called Sophie whose name he did not recall, all of Trump Management, Inc. had instructed him to attach a separate sheet of paper to all applications received from prospective black apartment seekers and that he was to write a big "C" on such attachment so as to indicate to Trump Management, Inc. that the application being considered was from a "colored" person. Furthermore, Mr. Miranda stated to me that he did this every time a black person applied for an apartment.

6. Mr. Miranda also stated to me during this interview that he was afraid that the Trumps would have him "knocked off", or words to that effect, because he told me about their allegedly discriminatory practices. He was reluctant to have his name disclosed.

7. After this interview, which was in all respects friendly, I had no further personal contact with Mr. Miranda. When it became necessary to disclose his identity, I sent a letter in the form attached hereto to him and to the other

persons who had provided information about Trump Management, Inc. The letter was run off on an MTST machine, and while in accordance with Justice Department practice, only one sample copy was retained (the one addressed to Phyllis Kirschenbaum), Justice Department records disclose that an identical letter was sent to Mr. Miranda and fourteen others.

ELYSE S. GOLDWEBER

Subscribed and sworn to before me
this day of August, 1974.

NOTARY PUBLIC

My commission expires: