

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

-----X  
UNITED STATES OF AMERICA, :  
 :  
 Plaintiff, : AFFIDAVIT  
 - against - : Civil Action No.  
 : 73 C 1529  
FRED C. TRUMP, et al., :  
 :  
 Defendants. :  
-----X

STATE OF NEW YORK )  
 ) SS.:  
COUNTY OF NEW YORK)

ROY M. COHN, being duly sworn deposes and says:

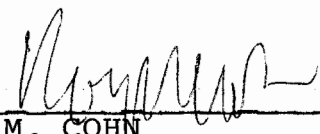
1. Agreement has been reached on the substance of all provisions in the consent decree, and the minor language modifications will be made later today.
2. These constant applications to the Court by the Civil Rights Section are assuming the aspects of paranoia. Without boring the Court with a minute by minute recital, Mr. Eskenazi met with Miss Goldstein and Mr. Schwelb at the appointed time at my office, and solved the very few remaining problems. I did not get out of court at the DeGiarde habeas corpus proceeding before Judge Grumet until late afternoon, and had to stop at another legal conference on the way uptown. I called in and was told by Mr. Eskenazi that things were worked out except for the actual signatures, and I was not needed.
3. I asked to have a copy left for me and my clients and suggested it be signed this week. Mr. Schwelb came on the phone in hysterics and kept repeating the same thing, which was that everything was agreed upon and when could it be signed. I told him this week after I had reviewed the final draft with my clients. I arrived at the office and found that Mr. Schwelb had left, which was fine. Mr. Schwelb fails to state in his affidavit

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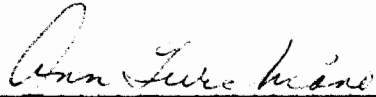
that he returned to my office about an hour after he had left, came into my office, to which I had returned, had a brief exchange of pleasantries, said nothing about any dissatisfaction in the signing of the papers this week, and then left.

4. The business about costs is absolutely ridiculous. We have gone so far to appease Mr. Schwelb that Mr. Fred Trump and Mr. Eskinzi themselves went to Washington to work out the language for the decree rather than inconvenience Mr. Schwelb and Miss Goldstein by having them come to New York.

5. It is respectfully submitted that a date convenient to the Court be fixed for the signing of the decree by the parties, and the acceptance thereof by the Court.

  
\_\_\_\_\_  
ROY M. COHN

Sworn to this 9th  
day of June, 1975

  
\_\_\_\_\_  
ANN TURCHIANO

ANN TURCHIANO  
Notary Public, State of New York  
No. 31-4035040  
Qualified in New York County  
Commission Expires March 30, 1977