

Page 1

1 AMERICAN ARBITRATION ASSOCIATION
 2 NEW YORK, NEW YORK

3 DONALD J. TRUMP FOR PRESIDENT, INC.,
 a Virginia not-for-profit corporation,

4 Claimant,

5 vs.

6 OMAROSA MANIGAULT NEWMAN,
 an individual,

7 Respondent.

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11 Videotaped Deposition of
 LUCIA CASTELLANO

12

13 Taken on behalf of Respondent

14 DATE TAKEN: Thursday, March 4, 2021

15 TIME: 10:03 a.m. - 12:13 p.m.

16 PLACE: By videoconference

17

18 Examination of the witness taken before:
 Julia Jarrett Green, RPR, FPR

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Page 2

1 A P P E A R A N C E S

2

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Page 3

I N D E X

Witness	Page
LUCIA CASTELLANO	
Direct Examination by Mr. Phillips	4
- - -	
(No Exhibits)	
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Page 4

1 COURT REPORTER: This deposition is being
 2 reported remotely by videoconference pursuant to
 3 the Florida Supreme Court Administrative Order No.
 4 AOSC 20-23.

5 Would counsel indicate your agreement by
 6 stating your name and your agreement on the
 7 record.

8 MR. PHILLIPS: John Phillips, attorney for
 9 Omarosa Manigault Newman, and we agree to a Zoom
 10 deposition and all the terms thereof.

11 MR. STONEROCK: And Ryan Stonerock on behalf
 12 of claimant, we also agree.

13 LUCIA CASTELLANO,
 14 having been produced and first duly sworn as a witness
 15 on behalf of respondent, and after responding "I do" to
 16 the oath, testified as follows:

17 DIRECT EXAMINATION

18 BY MR. PHILLIPS:

19 Q I'm going to start off where you can see me,
 20 but then I might go dark as I move my laptop around.
 21 But good morning.

22 A Good morning.

23 Q Can you hear me okay?

24 A Yes, I can.

25 Q Have you ever had your deposition taken

Page 5

1 before?

2 A Many, many years ago.

3 Q A few rules, and your attorney may have

4 explained them, but just so we have them on the record,

5 this is -- this may take a little while today, but it's

6 at a level of your convenience, too. If you've got to

7 go to the restroom, you need a break, whatever it is,

8 you let us know, and we'll take a timeout.

9 A Okay.

10 Q My only request is that we don't take a

11 timeout when I have a question pending unless it's a

12 super long question. That's my only request.

13 People talk differently than depositions

14 allow. In other words, in normal conversation we

15 shortcut each other and we get to the point.

16 Depositions we've got to make the point because a

17 judge, or in this case arbitrator, may be looking at

18 it. So we've got to -- I'm going to -- please let me

19 finish my sentence, and then I'll let you finish your

20 response.

21 Part B of that is uh-huhs and uh-uhs and

22 comments like that don't come out as well as yes and

23 nos just for purposes of the record. If I ask anything

24 confusing, your attorney may object. But if they don't

25 object, or if Mr. Stonerock doesn't object, but you

Page 6

1 still don't understand me, let me know.

2 You've sworn to tell the truth today. That's

3 really important. And you can't really tell the truth

4 to something you didn't understand. But we need to

5 know you didn't understand it before we assume you told

6 the truth; is that fair?

7 A Yes.

8 Q Okay. So state your name for the record,

9 please.

10 A Lucia Castellano.

11 Q And where are you currently employed?

12 A I am not employed.

13 Q Where were you last employed?

14 A For the Small Business Administration.

15 Q Okay. That's a government entity I assume?

16 A Yes.

17 Q And when were you last employed with the

18 Small Business Association?

19 A January 20th, '21.

20 Q Okay. So that coincides with the date of the

21 president change. Does that have anything to do with

22 why you're no longer employed by the government?

23 A Yes, correct.

24 MR. STONEROCK: Calls for speculation, lacks

25 foundation.

Page 7

1 You can answer, Lucia.

2 THE WITNESS: Yeah, I was part of the Trump

3 administration.

4 BY MR. PHILLIPS:

5 Q Okay. And were you terminated, or did you

6 quit?

7 A No. We were all -- all political appointees

8 are terminated on the day the new president is sworn

9 in.

10 Q Fair enough. So where were you before the

11 Small Business Association?

12 A I worked for the Trump campaign.

13 Q How long did you work for the Trump campaign?

14 A From June through January of '17.

15 Q June?

16 A June of 2016 through January of 2017.

17 Q And where did you work from January of 2017

18 onward?

19 A For the Small Business Administration.

20 Q Okay. When did you start at the Small

21 Business Association?

22 A I believe it was January 31st.

23 Q Okay. Of 2017?

24 A Yes.

25 Q You've worked there concurrently until the

Page 8

1 election; is that fair? Does that sound right?

2 A Yes, correct.

3 MR. STONEROCK: I'm sorry. Vague and

4 ambiguous.

5 John, maybe you could restate the question.

6 MR. PHILLIPS: I mean, some of these are just

7 informational, so I'm not really going to waste

8 the time necessarily. I get it and I appreciate

9 it, but --

10 MR. STONEROCK: It's your deposition.

11 MR. PHILLIPS: I get it.

12 BY MR. PHILLIPS:

13 Q So how did you get a job with the Trump

14 campaign?

15 A I was --

16 MR. STONEROCK: Calls for speculation, lacks

17 foundation.

18 You can answer.

19 THE WITNESS: Okay. I was approached by the

20 deputy campaign manager.

21 BY MR. PHILLIPS:

22 Q Who was that?

23 A Michael Glassner.

24 Q And what did Mr. Glassner say, or how did he

25 approach you?

Page 9

1 A He asked me if I was available. It was a
 2 five-month job. And I asked him what it was -- what it
 3 would be doing, and he said it was the HR director for
 4 the presidential campaign of Donald Trump.
 5 BY MR. PHILLIPS:
 6 Q Where did you work before that, immediately
 7 before?
 8 A Just give me a second. It was Citi Bike, the
 9 bike share organization. I worked for corporate.
 10 Q Okay. Did you know Mr. Glassner before he
 11 approached you with this job?
 12 A No, I did not.
 13 Q Did you know the Trumps -- did you know
 14 Donald Trump before Mr. Glassner approached you with
 15 this job?
 16 A Personally, no, I did not.
 17 Q Did you apply for the job with the Trump
 18 campaign?
 19 A No.
 20 MR. STONEROCK: Vague and ambiguous as to the
 21 term apply.
 22 BY MR. PHILLIPS:
 23 Q Do you know how they found you?
 24 MR. STONEROCK: Calls for speculation, lacks
 25 foundation.

Page 10

1 You can answer.
 2 THE WITNESS: Can I answer? Okay. My résumé
 3 was given to Michael Glassner by a recruiter
 4 friend of his.
 5 BY MR. PHILLIPS:
 6 Q And let's kind of talk about that résumé so I
 7 can understand a little bit more about you. Where are
 8 you from? Where is home?
 9 A Brooklyn, New York City.
 10 Q Have you lived there your entire life?
 11 A Entire life.
 12 Q Okay. And what is your -- I guess what's
 13 your educational background?
 14 A High school. No college.
 15 Q Very good. And did you take any other
 16 courses or -- no college. Did you take any post high
 17 school courses, coursework?
 18 A I took some courses within the bank because I
 19 worked for an investment bank. So they offered them,
 20 and I took them.
 21 Q And the only thing kind of related to your
 22 résumé that I've seen online is your LinkedIn profile.
 23 Do you have a LinkedIn profile?
 24 A I'm not on LinkedIn anymore. I probably have
 25 a profile, but I no longer go on LinkedIn.

Page 11

1 Q Okay. It still has you as HR director at
 2 Donald J. Trump for President. I assume that's
 3 probably the last time you updated it.
 4 A I don't use it. Yeah, obviously.
 5 Q About you it says you're a senior human
 6 resources professional. Is that fair and accurate?
 7 A Yes.
 8 Q And you've developed and delivered business
 9 aligned HR programs on a domestic and global scale. Is
 10 that accurate?
 11 A Correct.
 12 Q You have an expertise across a broad range of
 13 HR disciplines, including recruitment, compensation,
 14 talent assessment, performance management, and employee
 15 relations; is that correct?
 16 A Yes.
 17 Q And you have the ability to handle day-to-day
 18 HR activities as well as provide strategic advice and
 19 guidance; is that correct?
 20 A Correct.
 21 Q What is to your best understanding Donald J.
 22 Trump for President, Inc.?
 23 MR. STONEROCK: Calls for speculation, calls
 24 for -- lacks foundation, calls for a legal
 25 conclusion.

Page 12

1 You can try to answer if you understand it.
 2 THE WITNESS: I really don't understand it.
 3 What is --
 4 BY MR. PHILLIPS:
 5 Q Who was your employer when you were --
 6 A It was Donald J. -- that was the campaign,
 7 Donald J. Trump for President.
 8 Q What does a campaign do? From your
 9 understanding while you were there, what does a
 10 campaign do?
 11 A Well, from what I did I can tell you.
 12 Q Sure.
 13 A I managed the day-to-day HR functions,
 14 onboarding, offboarding, processing any invoices that
 15 came through, managing a group of interns who were
 16 charged with entering -- you know, opening the daily
 17 mail and entering the log in of checks to give to the
 18 treasury group and, you know, many different --
 19 speaking with managers.
 20 Q Who was your supervisor while you were there?
 21 A My direct supervisor was Corey Lewandowski
 22 and then it was Jeff DeWit.
 23 Q Are you familiar with a lady named Omarosa
 24 Manigault Newman?
 25 A Yes.

Page 13

1 Q How did you become familiar -- or how did you
 2 come to know Omarosa Manigault Newman?
 3 A She called me and told me that she was going
 4 to be working for the campaign.
 5 Q Okay. Do you recall that date?
 6 A No, I do not.
 7 Q And do you have an understanding of what she
 8 would be doing for the campaign?
 9 A No, I did not.
 10 Q What did you do next? When somebody calls
 11 and says I'm going to be working for the campaign,
 12 what's your next I guess interaction with that person
 13 from an HR perspective?
 14 A Well, I had to inquire. I don't recall who I
 15 actually asked or -- you know, at that point it was
 16 just very vague. I had no heads-up on it.
 17 Q What do you mean you had no heads-up on it?
 18 A I had no idea that she would be working for
 19 the campaign.
 20 Q Did you know who Omarosa was before that day?
 21 A Well, I've heard the name before.
 22 Q Did you watch Celebrity Apprentice and were
 23 you acquainted with her?
 24 A Nope. Never. I was never watching it.
 25 Never into it.

Page 14

1 Q Okay. The first -- do you know --
 2 COURT REPORTER: I'm sorry. John?
 3 MR. PHILLIPS: Yes.
 4 COURT REPORTER: Someone has popped up in the
 5 waiting room. J. Wyndal, The Warrior Lawyer.
 6 MR. PHILLIPS: He's cocounsel. He can come
 7 in.
 8 COURT REPORTER: Okay. Sorry to interrupt
 9 you.
 10 MR. PHILLIPS: That's okay.
 11 COURT REPORTER: I just wanted to make sure
 12 to let him in if I needed to. He's joining.
 13 MR. PHILLIPS: He's either very still or
 14 that's just a picture.
 15 Good morning, Mr. Gordon.
 16 MR. GORDON: Good morning. Good morning
 17 everyone.
 18 BY MR. PHILLIPS:
 19 Q So did you -- the e-mail you would have had
 20 related to the campaign or related to communications
 21 with -- I'm just going to call her Omarosa. Do you
 22 still have those, or are they in possession of the
 23 campaign?
 24 A Oh, no. They're in possession of the
 25 campaign.

Page 15

1 Q What was your role related to the -- I think
 2 we've abbreviated on nondisclosure agreements. But at
 3 the top it just says agreement. So what was your role
 4 when it came to the documents known as the NDA?
 5 A NDAs were prepared for each person working
 6 the campaign.
 7 Q Okay. Were they individually prepared,
 8 meaning that each -- there were terms that changed from
 9 individual to individual?
 10 A No.
 11 MR. STONEROCK: Calls for speculation, lacks
 12 foundation, vague as to time.
 13 BY MR. PHILLIPS:
 14 Q Okay. And what was your understanding about
 15 the purpose of the NDAs?
 16 MR. STONEROCK: Calls for a legal conclusion,
 17 calls for speculation, lacks foundation, vague as
 18 to time.
 19 You can answer if you have an understanding.
 20 THE WITNESS: Well, just actually what it
 21 says, nondisclosure agreement.
 22 BY MR. PHILLIPS:
 23 Q Okay. And do you know when this was
 24 initially brought up with Omarosa, that there was -- do
 25 you know when Omarosa became aware that an NDA needed

Page 16

1 to be signed?
 2 A Everyone who joins the -- joined the campaign
 3 had an NDA. Otherwise, you would not be onboarded.
 4 You would not get paid.
 5 Q Okay. Did you have an NDA with the campaign?
 6 A Yes, I did.
 7 Q Was it the same or -- was it the same or
 8 substantially similar to the one that Omarosa signed?
 9 A Every --
 10 MR. STONEROCK: Objection. Objection, not
 11 reasonably calculated to lead to admissible
 12 evidence.
 13 You can answer if you want to, Lucia.
 14 THE WITNESS: Okay, Ryan.
 15 Every NDA was the same.
 16 BY MR. PHILLIPS:
 17 Q Okay. From e-mail that I have -- was at any
 18 point L-u-c-i-a -- so how do you pronounce your name
 19 again?
 20 A Lucia.
 21 Q Lucia. Was Lucia5856@gmail.com your e-mail
 22 at any point?
 23 A That is my personal e-mail.
 24 Q There's an e-mail to that address carbon
 25 copied Lcastellan with no O at Donaldtrump.com. Was

Page 17

1 that also your e-mail?

2 A It was incorrect. She -- the O was left off.

3 Q Okay. There you go. Do you know when

4 related to her work for the campaign that Ms. Manigault

5 Newman signed the NDA?

6 A On or -- late August, probably around late

7 August because there was a bit of back and forth.

8 Q Do you recall what the back and forth was

9 about?

10 A Well, no. She wasn't always in the New York

11 office, very rarely. So, you know, her travels and she

12 had to -- I think it was presented to her by her

13 manager.

14 Q Who was her manager?

15 A I believe it was Alan Cobb.

16 Q I've seen Alan Cobb's name on things.

17 I've -- so what did Alan Cobb do for the campaign?

18 A I really don't remember.

19 Q Fair enough. What did Jason Miller do for

20 the campaign?

21 MR. STONEROCK: Calls for speculation, lacks

22 foundation, vague as to time.

23 If you recall, Lucia, at the time that you

24 were employed, you can answer.

25 THE WITNESS: Jason Miller was part of the

Page 18

1 communications team. What he did on a daily basis

2 I do not know.

3 BY MR. PHILLIPS:

4 Q Fair enough. And then there's another e-mail

5 involving a P. Manafort. I assume that's Paul

6 Manafort. What did he do for the campaign around that

7 time?

8 MR. STONEROCK: Calls for speculation, lacks

9 foundation, vague as to time.

10 You can answer.

11 THE WITNESS: Paul came in after Corey

12 Lewandowski as the campaign manager.

13 BY MR. PHILLIPS:

14 Q Okay. Where was the New York office at that

15 time?

16 A Trump Tower.

17 Q And how many people approximately were day to

18 day in Trump Tower at that time?

19 MR. STONEROCK: You mean for the campaign,

20 John?

21 MR. PHILLIPS: Yes. Yes. Thank you.

22 THE WITNESS: At any given point in time, I'd

23 be guessing if I were to say.

24 BY MR. PHILLIPS:

25 Q That's fine. Are we talking -- just ball

Page 19

1 park. Are we talking five people or 50 people or

2 some -- or hundreds of people?

3 A 25 people maybe.

4 Q Okay. Fair enough. And I'm not going to

5 hold you to that, but just for clarification. And so

6 all 35 or approximately whatever number would have

7 signed the same NDA?

8 A Yes.

9 MR. STONEROCK: Calls for speculation, lacks

10 foundation, vague as to time.

11 BY MR. PHILLIPS:

12 Q Given that Ms. -- did you handle the

13 compensation at all of employees when you were with the

14 campaign?

15 A By that what do you mean, handle the

16 compensation? Determine the compensation or...

17 Q Fair enough. Did you determine the

18 compensation?

19 A For -- not for everyone, no, I did not.

20 Q For Omarosa Manigault Newman were you

21 involved with determining her compensation package?

22 A No, I was not.

23 Q Do you know if she was compensated -- so

24 she -- what is a surrogate related to the campaign?

25 MR. STONEROCK: Vague and ambiguous as to the

Page 20

1 term surrogate, calls for speculation, lacks

2 foundation.

3 You can answer if you know or have --

4 THE WITNESS: I mean, my understanding at the

5 time was that they -- the surrogates all went out

6 and spoke on behalf of the candidate.

7 BY MR. PHILLIPS:

8 Q Were surrogates required to have an NDA; are

9 you aware?

10 MR. STONEROCK: Calls for speculation, lacks

11 foundation.

12 You can answer.

13 THE WITNESS: Okay. My -- if anyone -- in

14 order to be paid, you had to have an NDA. Working

15 for the campaign, you had to have an NDA.

16 BY MR. PHILLIPS:

17 Q Whose mandate was that?

18 MR. STONEROCK: Calls for speculation, lacks

19 foundation, vague and ambiguous as to the term

20 mandate.

21 Do you understand the question?

22 BY MR. PHILLIPS:

23 Q Ms. Castellano, we're going to do this

24 probably all day. And Mr. Stonerock has the right to

25 object. Unless he instructs you specifically not to

Page 21

1 answer, we can probably save a couple seconds each
 2 time, you need to answer as best you can.
 3 So I guess my question is this to clarify:
 4 You've indicated that everybody had to sign an NDA
 5 whether a surrogate or employee of the campaign. How
 6 did you know that?
 7 MR. STONEROCK: Objection, misstates her
 8 testimony.
 9 BY MR. PHILLIPS:
 10 Q Did I misstate your testimony?
 11 A Could you repeat that?
 12 Q Yeah, sure. Let me just start over. Who was
 13 required to sign an NDA with the campaign?
 14 A Everyone.
 15 MR. STONEROCK: Calls for speculation, lacks
 16 foundation, vague as to time.
 17 Lucia, just give me one second before
 18 answering to enter my objection.
 19 THE WITNESS: Yes. I'm sorry.
 20 MR. STONEROCK: No problem.
 21 BY MR. PHILLIPS:
 22 Q Are you speculating that everyone had to sign
 23 the NDA?
 24 A I joined the campaign late. I joined the
 25 campaign in June of '16. All those processes and

Page 22

1 policies were in place when I joined.
 2 Q Fair enough. Were those written policies and
 3 processes?
 4 A Written in a manual?
 5 Q Yes.
 6 A No.
 7 Q Okay. Who told you that every employee of
 8 the campaign under your HR -- under your HR department,
 9 had to sign an NDA?
 10 A It was the campaign manager. It was the
 11 legal firm that represented the campaign.
 12 Q Who was the legal firm at that time?
 13 A I believe it was Jones Day.
 14 Q Okay. Was Michael Cohen doing work for the
 15 campaign at any point?
 16 MR. STONEROCK: Calls for speculation, lacks
 17 foundation, vague as to time.
 18 You can answer.
 19 THE WITNESS: Michael Cohen worked for the
 20 Trump organization, not the campaign.
 21 BY MR. PHILLIPS:
 22 Q Fair enough. Who was the first -- did you
 23 say Corey Lewandowski was the first campaign manager
 24 when you started?
 25 A Correct.

Page 23

1 Q Okay. So Corey Lewandowski would have said
 2 everybody needs to sign an NDA. Do you recall him
 3 saying that?
 4 A No, I do not.
 5 Q Okay.
 6 A No. I -- Ryan, can I just answer this?
 7 MR. STONEROCK: Yes.
 8 THE WITNESS: Corey was on the road with the
 9 candidate. So my day-to-day interaction was with
 10 Glassner. Corey was only there one week and then
 11 he left.
 12 BY MR. PHILLIPS:
 13 Q Okay. So Glassner and the law firm said
 14 let's get these NDAs signed for every employee; fair?
 15 A Yes.
 16 MR. STONEROCK: Hang on a second. Michael
 17 Glassner is an attorney. So I just want to be
 18 careful in terms of your communications, Lucia,
 19 with Michael Glassner as they are privileged to
 20 the extent they apply to legal matters. So be
 21 careful when he's asking you about those
 22 communications.
 23 THE WITNESS: Okay.
 24 BY MR. PHILLIPS:
 25 Q So do you know who -- some of these are going

Page 24

1 to be obvious. I have no clue, so just bear in mind.
 2 Do you know who drafted the NDA Omarosa
 3 signed?
 4 MR. STONEROCK: Calls for speculation, lacks
 5 foundation, calls for attorney work product.
 6 You can answer, Lucia, if you know.
 7 THE WITNESS: Well, the NDAs were a form and
 8 a name had to be inserted.
 9 BY MR. PHILLIPS:
 10 Q Okay. Do you know who drafted that form, who
 11 came up with the form?
 12 MR. STONEROCK: Same objections.
 13 You can answer if you know, Lucia.
 14 THE WITNESS: No. I think I'd like a little
 15 more clarity on that. Like all of the form in
 16 general?
 17 BY MR. PHILLIPS:
 18 Q Yeah. The agreement that Omarosa signed that
 19 you said you signed and other employees signed, same
 20 form, do you know who drafted it, who actually came up
 21 with it?
 22 A That was through --
 23 MR. STONEROCK: Calls for speculation, lacks
 24 foundation, calls for attorney work product
 25 information.

Page 25

1 You can answer, Lucia.

2 THE WITNESS: That was done by campaign legal

3 counsel.

4 BY MR. PHILLIPS:

5 Q Okay. Fair enough. Do you know whether that

6 form was provided by -- well, strike that.

7 Okay. After the campaign some people

8 enter -- it's my understanding enter what's called,

9 what, the transition team?

10 A Yes, the --

11 MR. STONEROCK: Vague and ambiguous, calls

12 for speculation, vague as to time.

13 BY MR. PHILLIPS:

14 Q Okay. Do you know what I mean by transition

15 team, Ms. Castellano?

16 A The transition team came in after the

17 election was won.

18 Q Okay. So we've got a campaign, we've got a

19 victory and election and then there's a transition team

20 before the president is sworn in. Does that sound

21 accurate?

22 A Correct.

23 Q Okay. Were you ever a part of the transition

24 team?

25 A No, I was not.

Page 26

1 Q Were you involved with any HR decisions

2 related to the transition team?

3 A No, I was not.

4 Q Did the transition team have a straight NDA

5 or are you aware or not aware of that?

6 MR. STONEROCK: Calls for speculation, lacks

7 foundation.

8 You can answer if you know.

9 THE WITNESS: No, I had nothing to do with

10 the transition team.

11 BY MR. PHILLIPS:

12 Q Fair enough. And then there's obviously some

13 people went from campaign to transition team to the

14 White House. Did you have anything to do with HR

15 related to the presidency or White House?

16 A No, I did not.

17 Q For people who left the White House and they

18 came back under a consulting agreement with Donald J.

19 Trump for President, were you involved with any of

20 that?

21 MR. STONEROCK: Calls for speculation, lacks

22 foundation, vague and ambiguous as to time.

23 You can answer if you know.

24 THE WITNESS: I'm not sure I understand

25 because I was gone by the end of January. So I

Page 27

1 had nothing to do with the campaign.

2 BY MR. PHILLIPS:

3 Q And nobody could have come back because your

4 last day of service was when President Trump took the

5 oath of office or thereabouts; fair?

6 A Correct, the end of January.

7 Q Okay. Do you know if Ms. Manigault Newman

8 was offered additional compensation when she was asked

9 and signed the NDA?

10 A Could you repeat that?

11 Q Yes. Do you know if Ms. Manigault Newman was

12 given additional compensation for signing the NDA --

13 MR. STONEROCK: Calls for speculation, lacks

14 foundation, vague and ambiguous as to the term

15 additional compensation.

16 THE WITNESS: I'm sorry. I need to turn my

17 phone off. I'm sorry. I'm so sorry. I'm sorry.

18 Would you repeat that for me, please?

19 BY MR. PHILLIPS:

20 Q Fair. Do you know if Ms. Manigault Newman --

21 so she signed the NDA about August 24. Do you know if

22 she was given additional compensation at that time?

23 MR. STONEROCK: Vague and ambiguous as to the

24 term additional compensation.

25 THE WITNESS: Yeah, I'm not sure I understand

Page 28

1 what you mean additional compensation.

2 BY MR. PHILLIPS:

3 Q Was she paid more for signing -- after she

4 signed the NDA or for signing the NDA?

5 A The amount that an individual is paid is

6 determined prior to that.

7 Q Okay. So they're not paid any additional for

8 signing an NDA?

9 MR. STONEROCK: Calls for speculation, lacks

10 foundation, vague and ambiguous as to the term

11 additional compensation.

12 BY MR. PHILLIPS:

13 Q Ms. Castellano, are you aware of any employee

14 that was paid additional for negotiating their rights

15 under an NDA?

16 MR. STONEROCK: Vague and ambiguous as to

17 paid additional, calls for speculation, lacks

18 foundation.

19 You can answer if you understand the

20 question.

21 THE WITNESS: I mean, why would we pay

22 someone additional compensation for signing an

23 NDA? That's just not done.

24 BY MR. PHILLIPS:

25 Q In the Trump campaign it's not done?

Page 29

1 A Not to my knowledge.

2 Q Fair enough. Thank you. More silly

3 questions. Did you write any part of the NDA?

4 A I wrote my name.

5 Q Okay. Fair enough. Did you edit any of the

6 terms of the NDA?

7 MR. STONEROCK: Which NDA, John? Do you

8 mean the --

9 BY MR. PHILLIPS:

10 Q The NDA that Omarosa Manigault signed -- fair

11 enough. Did you -- other than your name, did you write

12 or edit any portion thereof?

13 A No, I did not. You would add my name and the

14 candidate's name. The candidate meaning the potential

15 employee, yes.

16 Q Do you know when you signed -- neither -- in

17 Omarosa's NDA neither -- there's no date in it. Do you

18 know when you signed her NDA?

19 A Most likely to the best of my recollection

20 would be the -- close to the end of August.

21 Q Do you know if Omarosa -- as we sit here

22 today right now just off of your review and preparation

23 for today, do you know if Omarosa signed an NDA with

24 the campaign before that end of August NDA?

25 A Could you repeat that?

Page 30

1 Q Do you know if Omarosa Manigault Newman

2 signed an NDA with the campaign before the one that she

3 and you signed at the end of August?

4 MR. STONEROCK: Calls for speculation, lacks

5 foundation.

6 You can answer if you know.

7 THE WITNESS: To the best of my knowledge

8 that's the only one she signed. That's the only

9 one I received.

10 BY MR. PHILLIPS:

11 Q Were you privy to any of the NDAs that may

12 have been signed before the campaign, for instance,

13 Celebrity Apprentice NDAs?

14 A No.

15 Q Have you ever seen an NDA that Omarosa signed

16 related to the Celebrity Apprentice?

17 A No, I did not.

18 Q Who is responsible for determining whether an

19 employee has violated -- I guess then when you were at

20 the campaign, who was responsible -- who was the

21 responsible person to determine whether an employee

22 violated an NDA?

23 MR. STONEROCK: Vague and ambiguous as to the

24 term violated, calls for speculation, lacks

25 foundation, and calls for a legal conclusion,

Page 31

1 calls for attorney work product as well.

2 You can answer if you know.

3 THE WITNESS: Well, I know it wasn't me,

4 so...

5 BY MR. PHILLIPS:

6 Q Fair enough. I guess -- let me ask it this

7 way: Did you ever refer a Trump campaign employee for

8 suspected violation of the NDA? In other words, you

9 reported something to somebody else, anything like

10 that?

11 A No, I did not.

12 Q Okay. Do you have an opinion as we sit here

13 today whether Omarosa Manigault Newman has violated the

14 NDA?

15 MR. STONEROCK: Objection, calls for a legal

16 conclusion, calls for attorney work product, calls

17 for speculation, lacks foundation.

18 You can answer if you can.

19 THE WITNESS: The opinions are left with

20 legal counsel. They're not mine to make.

21 BY MR. PHILLIPS:

22 Q Fair Enough. Who was the legal counsel that

23 made those decisions?

24 MR. STONEROCK: Calls for speculation, lacks

25 foundation, vague and ambiguous as to time, calls

Page 32

1 for attorney work product.

2 You can answer if you know based upon your

3 experience while you were at the campaign.

4 THE WITNESS: You mean legal counsel for the

5 campaign? I was gone. Remember, I was gone

6 January of '17.

7 BY MR. PHILLIPS:

8 Q Right. But -- and it may be that it just

9 never came up so you had no idea what would happen.

10 But I guess my question is from your understanding from

11 June of 2016 to January of 2017, who would have been

12 responsible for enforcement of the NDA? Who made those

13 decisions?

14 MR. STONEROCK: Calls for legal conclusion,

15 calls for speculation, lacks foundation, calls for

16 attorney work product.

17 You can answer if you know.

18 THE WITNESS: Jones Day.

19 BY MR. PHILLIPS:

20 Q Okay. When did you say the last time was

21 that you gave your deposition?

22 A Oh, probably 20 years ago.

23 Q Okay. So pre -- nothing related to Donald J.

24 Trump or the Trump campaign I assume?

25 A No.

Page 33

1 Q Okay. Fair enough. How many times have you
 2 met Donald Trump?
 3 MR. STONEROCK: Vague and ambiguous as to the
 4 term met.
 5 You can answer.
 6 BY MR. PHILLIPS:
 7 Q When you were working on the campaign, how
 8 often would you see Donald Trump?
 9 A Oh, he was on the road a lot. Probably in
 10 his company maybe eight times in a group setting.
 11 Q Okay. And since then how many times have you
 12 been in his presence?
 13 A I have not.
 14 Q So you haven't -- as you're aware, you
 15 haven't been -- well, have you been in -- let me just
 16 clarify this. Have you been to any I guess events --
 17 no, strike that.
 18 I'm excluding any events where you were in
 19 the audience; okay? So if you attended a campaign
 20 event or an event where you're in the audience, exclude
 21 that. Excluding events where you're in a large
 22 audience, have you been physically in the presence of
 23 Donald Trump since January of 2017?
 24 A No.
 25 Q Have you had phone conversations with him

Page 34

1 since January of 2017?
 2 A I'm not that important. No, I have not.
 3 Q I beg to disagree, but -- as his former HR
 4 director of his campaign, why do you say you're not
 5 that important?
 6 A I did not have daily interaction with the
 7 candidate. I mean, honestly, there were other things
 8 he was tending to.
 9 Q There's been 298 statements, comments,
 10 writings, opinions that have been produced to us that
 11 the campaign feels or has alleged that Omarosa has
 12 violated her NDA. Have you reviewed those?
 13 A I have not. I can do it now if you want me
 14 to, but it was provided by counsel.
 15 Q Okay. Before we get to your review of that,
 16 from somebody who believes they signed the same NDA as
 17 Omarosa Manigault Newman, do you believe you have the
 18 right to express political opinions regarding the
 19 president?
 20 MR. STONEROCK: Objection, calls for a legal
 21 conclusion, not reasonably calculated to lead to
 22 the discovery of admissible evidence, frankly
 23 totally irrelevant, and I'm going to instruct her
 24 not to answer.
 25 BY MR. PHILLIPS:

Page 35

1 Q When you executed this NDA, did you intend to
 2 waive your ability to exercise and speak your political
 3 opinions?
 4 MR. STONEROCK: John, you mean her own NDA?
 5 MR. PHILLIPS: I do mean her own NDA.
 6 MR. STONEROCK: What does her NDA have to do
 7 with any of the issues in this case?
 8 MR. PHILLIPS: It's the very same NDA.
 9 MR. STONEROCK: Okay. But that --
 10 THE WITNESS: Am I on trial?
 11 BY MR. PHILLIPS:
 12 Q No, I'm just asking, did you intend to waive
 13 your political opinions when you signed the NDA?
 14 MR. STONEROCK: Same objections. Totally
 15 irrelevant to any of the issues in this case. I'm
 16 going to also instruct the witness not to answer.
 17 BY MR. PHILLIPS:
 18 Q Okay. Under your reading of the NDA as an
 19 HR -- as the HR professional requiring it to be signed,
 20 is it your understanding as the HR director for the
 21 Trump campaign at the time it was signed that people
 22 would be waiving their ability to express political
 23 opinions?
 24 MR. STONEROCK: Calls for a legal conclusion,
 25 incomplete hypothetical, lacks foundation, calls

Page 36

1 for speculation.
 2 You can answer if you understand the
 3 question.
 4 THE WITNESS: I mean, it's called a
 5 nondisclosure agreement specifically for those
 6 reasons. And each one is different in the outline
 7 of what is required. JPMorgan has them, Chase has
 8 them, you know, so any large corporation.
 9 Obviously the terms are different, but, you know,
 10 I'm not sure what you need on this.
 11 BY MR. PHILLIPS:
 12 Q Yeah, I'm just trying to understand as the HR
 13 professional for the campaign whether it was your
 14 understanding that people would be permanently waiving
 15 their right to give political speech.
 16 MR. STONEROCK: Calls for speculation, lacks
 17 foundation, calls for a legal conclusion.
 18 You can answer if you understand the
 19 question.
 20 THE WITNESS: Well, I don't think it stops me
 21 from having a conversation with a bunch of
 22 friends.
 23 BY MR. PHILLIPS:
 24 Q Where is the line -- where is the -- so you
 25 can talk to friends, but you can't talk to the public,

Page 37

1 you can't talk to the media?

2 MR. STONEROCK: Calls for a legal conclusion,
3 incomplete hypothetical, calls for speculation,
4 lacks foundation.

5 You can answer if you understand the
6 question.

7 THE WITNESS: I really don't know where we're
8 going with this question.

9 BY MR. PHILLIPS:

10 Q You were the human resources director for the
11 Trump campaign and you also signed one of these NDAs.

12 A Yes.

13 Q You should have some level of understanding
14 of what the restriction was meant to be, and that's
15 what I want to understand. Where's the line as the
16 human resources director or former human resources
17 director for the Trump campaign? What can a person do
18 or not do under this NDA?

19 MR. STONEROCK: Calls for a legal conclusion,
20 lacks foundation, incomplete hypothetical, calls
21 for speculation.

22 You can answer if you understand.

23 THE WITNESS: I mean, it's outlined in the
24 NDA. I could speak to my parents. But, you know,
25 it states disparaging comments, you know. I mean,

Page 38

1 this is someone that I was working for.

2 BY MR. PHILLIPS:

3 Q Donald Trump?

4 A Yes.

5 Q Yes. Well, and a lot of people -- I mean, a
6 lot of people worked for him and a lot of people had a
7 lot of negative things to say about him. And I'm
8 trying to understand. Is that allowed? As the HR --
9 former HR director, where was the line on what could be
10 said? How did you instruct people who were filling
11 these NDAs out what they could do or not do under the
12 NDA?

13 MR. STONEROCK: Incomplete hypothetical,
14 calls for speculation, calls for a legal
15 conclusion, lacks foundation. I don't even
16 understand the question.

17 I'm not -- if you understand it, you can
18 answer it, Lucia.

19 THE WITNESS: Well, I mean, honestly when I
20 did give someone an NDA, I asked them to review it
21 with an attorney if they had any questions.

22 BY MR. PHILLIPS:

23 Q Okay. Did you do that in writing?

24 A No, I did not.

25 Q How did you do that? How did you tell people

Page 39

1 to review it with an attorney?

2 A If they called me or --

3 MR. STONEROCK: Hang on one second. Do you
4 mean -- which people? Do you mean Omarosa
5 specifically, or do you mean generally what her
6 general practice and policy was? Can you clarify,
7 John?

8 BY MR. PHILLIPS:

9 Q Ms. Castellano, did you just say that you
10 recommended people review this with an attorney?

11 A Whenever I gave someone an NDA, I said if you
12 have any questions, after we went through it, you
13 should review it with your attorney.

14 Q And my question is to Omarosa Manigault
15 Newman, did you make that recommendation to her?

16 A Yes.

17 Q In writing?

18 A No.

19 Q In person?

20 A Potentially over the phone.

21 Q How many times have you been in the same room
22 as Omarosa Manigault Newman?

23 A Oh, three times, four times tops.

24 Q What was your understanding as HR director of
25 the Trump campaign about what no disclosure of

Page 40

1 confidential information meant?

2 MR. STONEROCK: Objection, calls for a legal
3 conclusion, incomplete hypothetical. Do you want
4 to put the document in front of her? Do you want
5 her to interpret the agreement?

6 MR. PHILLIPS: I've sent you the document to
7 give to her. So if you have the agreement, could
8 you pull it up, please.

9 MR. STONEROCK: John, you have the ability to
10 share your screen, so you can put it up on your
11 screen.

12 THE WITNESS: I did not write the NDA, so I'm
13 not really clear as to why I'm being badgered
14 about what's in the NDA.

15 BY MR. PHILLIPS:

16 Q You were the human resources director that
17 seems to pride yourself enough on -- where's the
18 LinkedIn -- performance management and employee
19 relations and providing strategic advice and guidance.
20 I'm just trying to understand as both somebody who
21 signed the NDA and somebody who required -- demanded it
22 be signed, did you understand it?

23 MR. STONEROCK: Lacks foundation, calls for a
24 legal conclusion, incomplete hypothetical.

25 You can answer to the extent you understand

Page 41

1 the question.

2 THE WITNESS: I thought it was pretty clear.

3 BY MR. PHILLIPS:

4 Q Okay. So given that it's pretty clear --

5 A I didn't memorize it if that's what you're

6 asking.

7 Q I've sent counsel a copy to provide to you.

8 Do you have a copy of the NDA with you?

9 A I have to pull it up. So I don't know if

10 I -- I'll probably lose you if I do that. What

11 specifically are you looking for?

12 Q The paragraph one, it says no disclosure of

13 confidential information. And I'm just trying to

14 understand as HR director for the Trump campaign at the

15 time what that meant.

16 A Confidential information is exactly what it

17 meant.

18 MR. STONEROCK: Incomplete hypothetical,

19 calls for a legal conclusion, calls for

20 speculation, lacks foundation.

21 Q Ms. Castellano, you're not a lawyer; right?

22 A No, I am not.

23 Q I'm not asking you for any of your legal

24 conclusions. I'm asking you for conclusions related to

25 your role as HR director of the Trump campaign. I'm

Page 42

1 not posing a hypothetical; okay?

2 What I am going to give you is language from

3 the agreement and ask you whether you understood it or

4 not, okay, as HR director who passed this on to other

5 employees and required them to sign it.

6 A Well, the word confidential, I mean, it

7 doesn't mean that I can't share how many pens I had on

8 my desk, but it means I couldn't share confidential

9 information about salary or age or background or...

10 Q Is the fact that Donald Trump loves -- has an

11 appreciation for beautiful women confidential

12 information?

13 MR. STONEROCK: Objection, calls for a legal

14 conclusion, lacks foundation, calls for

15 speculation, incomplete hypothetical.

16 MR. PHILLIPS: Ryan, I don't mind if you

17 object, but could you at least make them make

18 sense. I'm not calling for a legal conclusion.

19 I'm asking the HR director of the Trump campaign

20 whether --

21 MR. STONEROCK: You're asking for application

22 of the NDA to a hypothetical fact that Donald

23 Trump loves beautiful women. That is just pure

24 speculation and lacks foundation. So all of the

25 objections are --

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1 MR. PHILLIPS: But yet it's a complaint that

2 the campaign is making against Omarosa Manigault

3 Newman and seeking millions of dollars for, simply

4 because Trump made no secret of his appreciation

5 for beautiful women, paragraph three of your

6 298-item exhibit. And my question is --

7 MR. STONEROCK: Well, yeah, you didn't cite

8 to that in your question, John. Okay. You took

9 it completely out of context. And you're asking a

10 non-attorney and somebody who hasn't been employed

11 by the campaign for four years to apply the NDA to

12 a statement of claim that was filed long after she

13 left the campaign. She's not -- she's not in a

14 position to answer that question in my opinion.

15 MR. PHILLIPS: Okay. Well, that can be

16 deferred to later.

17 BY MR. PHILLIPS:

18 Q For your understanding as the HR director who

19 implemented this NDA, would it violate confidential

20 information for someone to say Trump made no secret of

21 his appreciation for beautiful women?

22 MR. STONEROCK: Calls for speculation,

23 incomplete hypothetical, lacks foundation, calls

24 for a legal conclusion.

25 Do you understand the question?

Page 44

1 THE WITNESS: I think the question is more

2 someone's opinion. How would they know unless

3 they were very, very friendly with the president?

4 BY MR. PHILLIPS:

5 Q Well, the fact that Donald Trump appreciates

6 beautiful women he said on Howard Stern and says

7 publicly; correct?

8 MR. STONEROCK: Calls for speculation, lack

9 of foundation --

10 THE WITNESS: I don't watch Howard Stern.

11 MR. STONEROCK: -- incomplete hypothetical.

12 BY MR. PHILLIPS:

13 Q Let's talk about Donald Trump's affairs. Are

14 those secret?

15 MR. STONEROCK: John.

16 MR. PHILLIPS: You want to amend your

17 complaint?

18 MR. STONEROCK: Really?

19 MR. PHILLIPS: Yes, really. You've sued

20 Omarosa because she said he had an affair.

21 MR. STONEROCK: Okay.

22 MR. PHILLIPS: Repeatedly.

23 MR. STONEROCK: But you need to ask that --

24 you need to ask this witness, John, questions that

25 are within her own personal knowledge. And you

Page 45

1 need to lay a foundation --

2 MR. PHILLIPS: She was the HR director that

3 implemented --

4 MR. STONEROCK: Before I'm going to allow you

5 to ask her these questions and continue to badger

6 her, you need to lay a foundation as to how she

7 has personal knowledge about the facts -- you

8 know, about the issues that you're asking her

9 questions about.

10 MR. PHILLIPS: I disagree.

11 MR. STONEROCK: As long as you do that, John,

12 then we can move forward.

13 BY MR. PHILLIPS:

14 Q As the HR director who implemented and

15 required Omarosa Manigault Newman to sign this NDA, is

16 the fact that Donald Trump had an affair confidential

17 information and a breach of the agreement?

18 MR. STONEROCK: Calls for a legal conclusion,

19 incomplete hypothetical. I'm going to instruct

20 Ms. Castellano not to answer the question.

21 BY MR. PHILLIPS:

22 Q Is it public knowledge that Donald Trump had

23 affairs?

24 MR. STONEROCK: Incomplete hypothetical,

25 calls for speculation, lacks foundation, vague and

Page 46

1 ambiguous as to the term public knowledge. I'm

2 going to instruct Ms. Castellano not to answer.

3 BY MR. PHILLIPS:

4 Q Ms. Castellano, have you heard of Stormy

5 Daniels?

6 A I've heard the name.

7 Q Where have you heard the name?

8 A On the news.

9 Q Are you aware whether there was an admission

10 by Donald Trump or his attorneys that he had an affair

11 with Stormy Daniels?

12 MR. STONEROCK: Objection, lacks foundation,

13 calls for speculation, not reasonably calculated

14 to lead to the discovery of admissible evidence.

15 You can answer if you understand the

16 question.

17 THE WITNESS: I really don't know where

18 you're going with this question. But how would I

19 know any of that?

20 BY MR. PHILLIPS:

21 Q Okay. Do you watch TV?

22 A Occasionally. I don't watch the news.

23 Q Okay. As HR director -- former HR director

24 for the Trump campaign, did you -- as former HR

25 director for the Trump campaign, did you have any

Page 47

1 conversations with anybody with the campaign about what

2 was meant by no disclosure of confidential information?

3 MR. STONEROCK: This is excluding --

4 objection, calls for attorney-client privilege

5 information and attorney work product.

6 Excluding any attorneys, Lucia, you can

7 answer.

8 THE WITNESS: Sorry. Could you repeat the

9 question, though?

10 BY MR. PHILLIPS:

11 Q Yes. While you were HR director of the

12 campaign, did you have any conversations about what "no

13 disclosure of confidential information" meant?

14 MR. STONEROCK: Same objections. Exclude any

15 conversations with attorneys.

16 THE WITNESS: With -- and conversations with

17 individuals on the campaign, with interns, with --

18 BY MR. PHILLIPS:

19 Q Anybody.

20 A Anyone? If they asked, yes.

21 Q And what did you explain?

22 A I explained to them what the agreement was

23 talking about, exactly that, confidential information.

24 Q Okay. And what was your understanding of

25 confidential information -- what was confidential

Page 48

1 information while HR director of the Trump campaign?

2 MR. STONEROCK: Calls for a legal conclusion.

3 You can answer.

4 THE WITNESS: You realize everything in HR is

5 confidential. So most of the information that I

6 dealt with on a daily basis was confidential.

7 BY MR. PHILLIPS:

8 Q Right. And I get -- I get business records,

9 I get -- I get salaries and employee-employer issues, I

10 get that. But what I'm trying to understand is

11 Ms. Manigault Newman's been sued 298 times essentially

12 for comments about, you know, whether Donald Trump

13 hated Obama, whether he had had prior affairs, whether

14 he used curse words, you know, things like that that

15 just seem a part of the public conversation, don't

16 seem confidential information. But you're my H --

17 you're the person produced to describe to me what the

18 HR, you know, what -- you're the one that gave Omarosa

19 this contract. So I'm trying to understand what

20 confidential information meant. I understand the

21 context within HR. But is it meant to limit speech

22 outside of human resources?

23 MR. STONEROCK: Objection, misstates the

24 statement of claim, calls for a legal conclusion,

25 is a -- the entire question is a run-on question

Page 49

1 that's vague and ambiguous, and also is an
 2 incomplete hypothetical.
 3 You can answer if you understand the
 4 question.
 5 THE WITNESS: I think the question is meant
 6 to trip me up in some way. But quite honestly,
 7 confidential information, as an adult you would
 8 understand what that meant. It was -- it was
 9 written about disparaging comments, confidential
 10 information. So I'm not sure how much more of
 11 that information or how much more it needed to be
 12 conveyed to each individual.
 13 BY MR. PHILLIPS:
 14 Q Okay. There's two paragraphs related to
 15 this. There's confidential information in paragraph
 16 one and then disparagement under paragraph two, so
 17 they're separate. And confidential information I don't
 18 think is defined. Oh, yep, it means all information
 19 whether or not embodied in any media of a private
 20 proprietary or confidential nature or that Mr. Trump
 21 insists remain private or confidential, including but
 22 not limited to any information with respect to the
 23 personal life, political affairs, and/or business
 24 affairs of Mr. Trump or any family member, including
 25 but not limited to the assets, investments, revenue,

Page 50

1 expenses, taxes, financial statements, actual or
 2 prospective business ventures, contracts, alliances,
 3 affiliations, relationships, affiliated entities, bids,
 4 letters of intent, term sheets, decision strategies,
 5 techniques, methods, projections, forecasts, customers,
 6 clients, contacts, customer lists, contact lists,
 7 schedules, appointments, meetings, conversations,
 8 notes, and other communications that Mr. Trump, any
 9 family member, any Trump company, or any family member.
 10 So what I'm trying to understand is how was
 11 that actually conveyed as to what couldn't be said that
 12 was deemed confidential at the time you were HR
 13 director?
 14 MR. STONEROCK: Objection, the question is
 15 vague and ambiguous, calls for a legal conclusion.
 16 The document speaks for itself. You just read the
 17 definition of confidential information, you know,
 18 directly from the agreement.
 19 Do you want to ask her if she had any
 20 discussions with Omarosa about that term?
 21 MR. PHILLIPS: If I'd have wanted to ask
 22 that, I'd have asked it, Ryan.
 23 MR. STONEROCK: I don't understand the
 24 question, John.
 25 MR. PHILLIPS: I don't need your help. You

Page 51

1 can object. Object. Object all you want. I'm
 2 here for it.
 3 But my question is: From the HR director
 4 what level of speech was meant to be -- if she
 5 knows, was meant to be restricted under the
 6 confidential -- as confidential information.
 7 MR. STONEROCK: Objection, calls for a legal
 8 conclusion, the document speaks for itself, calls
 9 for speculation, lacks foundation, incomplete
 10 hypothetical.
 11 Do you understand the question?
 12 THE WITNESS: No. No, I don't.
 13 BY MR. PHILLIPS:
 14 Q In as much specificity as possible, tell me
 15 how you described and trained employees of the Trump
 16 campaign about the prohibition of disclosure of
 17 confidential information.
 18 MR. STONEROCK: Lacks foundation, calls for
 19 speculation, compound.
 20 You can answer if you understand.
 21 THE WITNESS: There was no training
 22 necessary. First of all, can I just explain to
 23 you that on a daily basis I managed interns. So
 24 the interns were young college students. All of
 25 the other individuals that worked for the campaign

Page 52

1 were adults and they were hardly in the office.
 2 They were traveling with the candidate, so I did
 3 not see them. I think most people understand
 4 those two paragraphs that you're referring to.
 5 BY MR. PHILLIPS:
 6 Q Are you aware whether Donald Trump hated
 7 Muslims?
 8 MR. STONEROCK: You can answer based upon
 9 your personal knowledge.
 10 THE WITNESS: How would I know that?
 11 BY MR. PHILLIPS:
 12 Q Are you aware whether or not Donald Trump
 13 said the N word ever?
 14 A No.
 15 Q Are you aware of Donald Trump's feelings
 16 towards former President Obama?
 17 A No.
 18 MR. STONEROCK: Calls for speculation, lacks
 19 foundation.
 20 BY MR. PHILLIPS:
 21 Q Are you aware of Donald Trump's marital
 22 infidelity?
 23 MR. STONEROCK: Calls for speculation, lacks
 24 foundation.
 25 BY MR. PHILLIPS:

Page 53

1 Q Are you aware of Donald Trump's marital
2 infidelity?

3 MR. STONEROCK: Calls for speculation, lacks
4 foundation, argumentative.

5 BY MR. PHILLIPS:

6 Q You can answer.

7 A No. Honestly, how would I know that?

8 Q Okay. Are you aware of, referring to page
9 22, number 59, any corruption that went on in the
10 campaign? Are you personally aware of corruption that
11 went on in the campaign?

12 MR. STONEROCK: Calls for speculation, lacks
13 foundation, vague as to the term corruption, vague
14 as to time.

15 You can answer.

16 THE WITNESS: I am not.

17 BY MR. PHILLIPS:

18 Q Are you aware of any corruption that went on
19 in the Trump organization personally?

20 MR. STONEROCK: Calls for a legal conclusion,
21 calls for speculation, lacks foundation, vague as
22 to time, vague as to the term corruption.

23 You can answer.

24 THE WITNESS: I had no dealings with the
25 Trump organization.

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1 BY MR. PHILLIPS:

2 Q Please describe in as much specificity as you
3 can any and all conversations you had explaining or
4 training the Trump employees what no disparagement in
5 the no disparagement clause meant.

6 A There really was no training. It's pretty
7 clear. Doesn't the paragraph outline that?

8 Q Yes. It says no disparagement during the
9 term of your service and at all times thereafter. You
10 hereby promise and agree not to demean or disparage
11 publicly the company, Mr. Trump, any Trump company, any
12 family member, or any family member of the company or
13 any asset of the foregoing, own or product or service
14 any of the foregoing offer in each case by or in any of
15 the restricted means in context and to prevent your
16 employees from doing so.

17 In laymen's terms can you tell me what that
18 meant?

19 MR. STONEROCK: Calls for a legal conclusion.

20 MR. PHILLIPS: What in laymen's terms means,
21 non-legal terms.

22 MR. STONEROCK: You're asking for an
23 interpretation of a legal document, John. I don't
24 think just because you say laymen's terms doesn't
25 mean that you're not asking for an interpretation

Page 55

1 of a legal document.

2 BY MR. PHILLIPS:

3 Q Ms. Castellano, did you have a lawyer consult
4 with you before you signed this agreement?

5 A No, I did not.

6 MR. STONEROCK: Objection, relevance.

7 BY MR. PHILLIPS:

8 Q Why not?

9 MR. STONEROCK: Objection, relevance. You
10 don't have to answer that question if you don't
11 want to, Ms. Castellano.

12 MR. PHILLIPS: Are you instructing the
13 witness not to answer?

14 MR. STONEROCK: I'll leave it up to her.

15 THE WITNESS: No. I understood what I was
16 signing.

17 BY MR. PHILLIPS:

18 Q Then what does no disparagement -- the no
19 disparagement clause mean?

20 MR. STONEROCK: Objection, calls for a legal
21 conclusion.

22 BY MR. PHILLIPS:

23 Q In laymen's terms what did that mean to you?

24 MR. STONEROCK: Same objection. The document
25 speaks for itself.

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1 BY MR. PHILLIPS:

2 Q Ms. Castellano, in laymen's terms what did
3 the non-disparagement clause mean to you?

4 MR. STONEROCK: Same objections.

5 Do you want to -- Mr. Phillips read from the
6 document. Do you have the document in front of
7 you?

8 THE WITNESS: No, I do not.

9 MR. STONEROCK: Why don't you take a look at
10 it, of course, subject to the same objections. It
11 calls for a legal conclusion and the document
12 speaks for itself. You can try to answer the
13 question.

14 MR. PHILLIPS: Let's just take -- we've gone
15 an hour. Let's take a break so she can pull it
16 up. I mean, I can try, but that's why I sent it
17 via e-mail.

18 MR. STONEROCK: There are ways, John,
19 obviously where you could put it up on the screen
20 so we could all be looking at it right now. You
21 can share your screen. You have it on your
22 computer.

23 MR. PHILLIPS: There's also ways for you to
24 prepare your witnesses with the stuff that I --

25 MR. STONEROCK: Yeah, well, I mean, if you

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1 send me a document 15 minutes before the
 2 deposition and you know --
 3 MR. PHILLIPS: That was sent last night. The
 4 ones sent today were --
 5 MR. STONEROCK: Oh, sorry, last night. I
 6 can't -- you sent documents at both times, so --
 7 MR. PHILLIPS: Okay. We'll take a break and
 8 hopefully she can get it up.
 9 MR. STONEROCK: It's more a reflection of
 10 your lack of preparation than ours.
 11 MR. PHILLIPS: It's hard for you to lecture
 12 me on lack of preparation when you send me a
 13 complaint like this and can't get a witness to
 14 answer or provide damages. But go right ahead.
 15 COURT REPORTER: I'm now pausing the
 16 recording.
 17 (Brief recess.)
 18 BY MR. PHILLIPS:
 19 Q Ms. Castellano, were you able to find the
 20 agreement? Were you able to find the agreement?
 21 A Yes. Just bear with me one second.
 22 Q Okay.
 23 A Okay. I have it.
 24 Q And is it -- can you turn to page 5. Is it
 25 the one signed by you and Omarosa at the time

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1 Manigault, now Manigault Newman?
 2 A No, it is not. It's the other -- it's signed
 3 by Omarosa.
 4 Q Okay. And that's fine. That will be the --
 5 I mean, if that's the one she signed, we know you
 6 signed it after the fact. That's -- you can refer to
 7 that one.
 8 A Okay. Where am I looking?
 9 Q The paragraph 1, page 1 note, disclosure of
 10 confidential information. You indicated to some extent
 11 that you explained that to employees or had
 12 communications about that with employees. And I just
 13 want to understand now that you've had a chance to
 14 review it what the substance of those conversations
 15 were as HR director of the Trump campaign.
 16 MR. STONEROCK: Objection, misstates her
 17 testimony.
 18 You can answer.
 19 THE WITNESS: And you're looking at the first
 20 paragraph?
 21 BY MR. PHILLIPS:
 22 Q The number one paragraph. No disclosure --
 23 A No disclosure of -- right, during the term of
 24 your service. Okay. I think I explained it to you
 25 before.

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1 Q You --
 2 MR. STONEROCK: Ms. Castellano, he's asking
 3 you about your conversations with campaign
 4 employees regarding this provision. Do you recall
 5 any conversations with campaign employees about
 6 this provision?
 7 THE WITNESS: Only with the interns. No one
 8 had questions on it other than them.
 9 BY MR. PHILLIPS:
 10 Q So what questions did the interns have?
 11 A When they received checks from donors, you
 12 know, am I allowed to talk about this? And I was like,
 13 no, you are not.
 14 Q Okay. Any other questions that you answered
 15 from interns or anybody else about the no disclosure of
 16 confidential information paragraph?
 17 A Not to my recollection.
 18 Q Would -- and I know I'm taking you back a few
 19 years, but let's say Donald Trump is on Access
 20 Hollywood or is, you know, being filmed and says to
 21 Billy Bush, "I don't even wait. And when you're a
 22 star, they let you do it. You can do anything. Grab
 23 them by the pussy. You can do anything."
 24 So let's say Donald Trump says that. Can the
 25 interns talk about that the next day without violating

Page 60

1 the disclosure -- no disclosure of confidential
 2 information?
 3 MR. STONEROCK: Objection, incomplete
 4 hypothetical, calls for a legal conclusion, lacks
 5 foundation.
 6 You can answer if you understand the
 7 question.
 8 THE WITNESS: I understand. But they were
 9 not allowed to have that -- any discussions.
 10 BY MR. PHILLIPS:
 11 Q Any discussions whatsoever about President
 12 Trump?
 13 MR. STONEROCK: Misstates her testimony.
 14 BY MR. PHILLIPS:
 15 Q Any -- please explain.
 16 A I lost the video. I'm sorry.
 17 Q That's okay. Let's back up. You said they
 18 weren't allowed to have any discussions. I think
 19 that's what you said.
 20 A But you were referring to -- you referred to
 21 Billy Bush.
 22 Q I did. But I said could the interns then
 23 talk about that the next day? That was all over the
 24 nation about Donald Trump saying you can grab them by
 25 the pussy. What I'm trying to -- excuse my language.

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1 What I'm trying to understand is: Could the
 2 interns talk about that the next day amongst
 3 themselves, publicly?
 4 MR. STONEROCK: Calls for a legal conclusion,
 5 incomplete hypothetical, compound, vague and
 6 ambiguous.
 7 You can answer if you understand the
 8 question.
 9 THE WITNESS: I'm trying to get the video
 10 back. I'm so sorry. I don't know what happened.
 11 I can't get the video back. It's driving me
 12 crazy.
 13 MR. STONEROCK: We can see you.
 14 THE WITNESS: You can see me going crazy?
 15 MR. STONEROCK: Yes, and hear you.
 16 THE WITNESS: Oh, I got it. I'm sorry.
 17 So you're asking me if the interns were
 18 allowed to talk amongst themselves?
 19 MR. PHILLIPS: Yes.
 20 MR. STONEROCK: About the Billy Bush tape?
 21 MR. PHILLIPS: About -- yeah, the Billy Bush
 22 tape.
 23 MR. STONEROCK: Calls for legal conclusion,
 24 incomplete hypothetical.
 25 You can answer if you have an understanding.

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1 THE WITNESS: And the answer is no. They
 2 should not have been discussing that.
 3 BY MR. PHILLIPS:
 4 Q Okay. Why not?
 5 MR. STONEROCK: Calls for a legal conclusion,
 6 incomplete hypothetical.
 7 BY MR. PHILLIPS:
 8 Q As HR director of the Trump campaign and
 9 person responsible for countersigning the NDAs, why
 10 not?
 11 MR. STONEROCK: Calls for legal conclusion,
 12 incomplete hypothetical.
 13 THE WITNESS: These were comments made
 14 apparently. Was it true? We don't know. I
 15 mean --
 16 BY MR. PHILLIPS:
 17 Q I'm not concerned about the veracity of what
 18 was said. What I'm concerned about --
 19 A I understand what -- I understand where
 20 you're going. And I was never in the same room with
 21 the interns. I had my own office. They knew better.
 22 They were all Trump supporters. If they walked out to
 23 lunch and had a conversation, I wasn't privy to it.
 24 But they were pretty -- pretty mature for interns and
 25 knew the boundaries.

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1 Q And what were the boundaries?
 2 MR. STONEROCK: Calls for a legal conclusion,
 3 incomplete hypothetical.
 4 BY MR. PHILLIPS:
 5 Q As HR director and countersigner of the NDA
 6 for the Trump campaign, what were the boundaries?
 7 MR. STONEROCK: Objection, calls for a legal
 8 conclusion, incomplete hypothetical.
 9 You're asking the boundaries of the NDA?
 10 MR. PHILLIPS: She said they knew the
 11 boundaries, and I asked what the boundaries are as
 12 countersigner of the NDA and HR director for the
 13 Trump campaign.
 14 MR. STONEROCK: Again, calls for a legal
 15 conclusion, incomplete hypothetical.
 16 BY MR. PHILLIPS:
 17 Q Ms. Castellano, what were the boundaries you
 18 just discussed?
 19 A Negativity --
 20 MR. STONEROCK: Objection.
 21 BY MR. PHILLIPS:
 22 Q Negativity is a boundary?
 23 A Negative comments.
 24 Q So you can make -- a person who's signed this
 25 agreement can make no negative comments about the

Page 64

1 president whatsoever?
 2 MR. STONEROCK: Incomplete hypothetical,
 3 calls for a legal conclusion.
 4 BY MR. PHILLIPS:
 5 Q What did you mean by negativity?
 6 A Isn't that what disparaging means?
 7 Q You tell me how you interpret it as HR
 8 director and countersigner of the agreement.
 9 A That's how --
 10 MR. STONEROCK: Calls for a legal conclusion.
 11 THE WITNESS: Sorry, Ryan.
 12 MR. STONEROCK: You can answer.
 13 THE WITNESS: That's how I interpret it.
 14 BY MR. PHILLIPS:
 15 Q Okay. So as countersigner of the agreement
 16 and HR director for the Trump campaign, you would have
 17 instructed that there can be no negative comments about
 18 the campaign, Mr. Trump, or his family as a result of
 19 signing this agreement?
 20 MR. STONEROCK: Objection, misstates her
 21 testimony, calls for a legal conclusion.
 22 You can answer if you understand the
 23 question.
 24 THE WITNESS: Yeah, that's correct.
 25 BY MR. PHILLIPS:

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1 Q Is that forever?

2 MR. STONEROCK: Calls for a legal conclusion,
3 incomplete hypothetical.

4 BY MR. PHILLIPS:

5 Q Does that requirement last forever?

6 MR. STONEROCK: Objection, calls for a legal
7 conclusion, lacks foundation, incomplete
8 hypothetical.

9 This is something that, you know, the
10 arbitrator is going to decide, Mr. Phillips.

11 MR. PHILLIPS: She is countersigner of the
12 agreement.

13 BY MR. PHILLIPS:

14 Q As countersigner of the agreement, meaning
15 you signed this, you bound this, you bound the
16 campaign, you bound -- you made this a contract. Did
17 you intend that agreement that you cannot say anything
18 negative about the president or the candidate or his
19 family to last forever?

20 MR. STONEROCK: Did you have -- objection,
21 calls for a legal conclusion, calls for
22 speculation, lacks foundation.

23 To the extent you had any intention when you
24 signed it, you can answer.

25 THE WITNESS: I signed it, yes, representing

Page 66

1 the campaign, but the employee also signed it.

2 BY MR. PHILLIPS:

3 Q Correct. And your understanding at the time
4 you signed it that this was to -- what was your
5 understanding at the time you signed it was for how
6 long this would last?

7 MR. STONEROCK: Objection, calls for a legal
8 conclusion.

9 Did you have an understanding as to --

10 THE WITNESS: My understanding was that it
11 would last forever.

12 BY MR. PHILLIPS:

13 Q Okay. Thank you. So no negativity. Does it
14 matter -- you know, as HR director and countersigner to
15 the agreement, does it matter that Donald Trump was
16 elected president?

17 MR. STONEROCK: Calls for speculation,
18 incomplete hypothetical, calls for a legal
19 conclusion, vague and ambiguous as to term matter.

20 Do you have --

21 THE WITNESS: Do you want me to answer that?

22 MR. STONEROCK: Do you have an opinion? I
23 mean, he's asking you for a legal opinion. I
24 mean --

25 MR. PHILLIPS: No, I'm not.

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1 BY MR. PHILLIPS:

2 Q As countersigner to the agreement and as HR
3 director for the Trump campaign, do you know whether
4 this agreement -- you said this agreement is
5 enforceable forever. Do you know if this is
6 enforceable or became -- was still enforceable once
7 Trump became president? Do you know?

8 MR. STONEROCK: Calls for a legal conclusion,
9 incomplete hypothetical.

10 You mean as she sits here today?

11 MR. PHILLIPS: Does she know whether this
12 agreement was affected by Trump getting elected
13 president?

14 MR. STONEROCK: Calls for a legal conclusion,
15 incomplete hypothetical.

16 Do you have any -- do you know?

17 THE WITNESS: Do I know? I would think it
18 would be more enforceable as he was the president
19 of the United States.

20 BY MR. PHILLIPS:

21 Q Very good. Thank you for that. What about
22 positive comments, what about -- what about I guess
23 that's not positive -- strike that.

24 Do you know if the agreement covers,
25 restricts saying confidential nice things about the

Page 68

1 president?

2 MR. STONEROCK: Objection, calls for a legal
3 conclusion, incomplete hypothetical.

4 BY MR. PHILLIPS:

5 Q Ms. Castellano, as countersigner of this
6 agreement --

7 MR. STONEROCK: Vague and ambiguous as to
8 positive and nice.

9 BY MR. PHILLIPS:

10 Q Ms. Castellano, do you know what saying nice
11 things means?

12 A Like he's a great guy or --

13 Q Yeah.

14 A -- he's fair or we love him, his energy is
15 amazing? Sure, I --

16 Q His business acumen is the best in the world
17 and what he's done with the Trump organization has not
18 been matched in the history of mankind. Would that be
19 allowed to be said in your opinion as countersigner of
20 the NDA and as HR director for the Trump -- Donald J.
21 Trump for President, Inc.?

22 MR. STONEROCK: Objection, calls for a legal
23 conclusion, incomplete hypothetical.

24 THE WITNESS: It doesn't fall under the
25 category of disparaging.

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1 BY MR. PHILLIPS:

2 Q But would it be confidential information if

3 you're talking about Donald Trump's business acumen and

4 his success in his company?

5 MR. STONEROCK: Objection, calls for a legal

6 conclusion, incomplete hypothetical. The document

7 speaks for itself.

8 THE WITNESS: You're trying to make the

9 nondisclosure into something that it's not.

10 BY MR. PHILLIPS:

11 Q Why do you say that? What do you mean?

12 A Because you're talking now about what a

13 wonderful businessman he is, what he did with the Trump

14 organization. Those are glowing remarks.

15 Q Okay.

16 A Okay.

17 Q I get that. But if I'm talking about

18 somebody's business -- and I'm just trying to

19 understand. You signed it. But it seems to me that

20 confidential information is confidential information

21 regardless of whether it's naughty or nice; right?

22 MR. STONEROCK: Calls for a legal conclusion,

23 incomplete hypothetical, vague as to the terms

24 naughty and nice.

25 THE WITNESS: You know, everyone in New York

Page 70

1 knows Donald Trump. So everyone knew what a

2 successful businessman he was, plain and simple.

3 BY MR. PHILLIPS:

4 Q Do people know about his bankruptcies?

5 MR. STONEROCK: Calls for speculation, lacks

6 foundation, vague as to time, incomplete

7 hypothetical.

8 BY MR. PHILLIPS:

9 Q Did people in New York accuse him of rape?

10 MR. STONEROCK: Calls for speculation, lacks

11 foundation, argumentative.

12 BY MR. PHILLIPS:

13 Q Do you know that? Do you know whether Donald

14 Trump had bankruptcies before running his campaign?

15 A No idea.

16 Q Do you know whether he was accused of rape

17 before running for president?

18 A No, I do not.

19 Q Do you know if Donald Trump said that -- let

20 me get it correct -- they say that more people were

21 killed by women in this act, meaning the act of sexual

22 intercourse, than killed in Vietnam. And Trump said,

23 you know, you get criticized for that statement, but

24 the statement is very easily true. And then basically

25 says he should get the Congressional Medal of Honor for

Page 71

1 his sexual proclivity.

2 Do you know if a statement like that if

3 broadcast by Howard Stern would have been heard by

4 people in New York?

5 MR. STONEROCK: Calls for speculation, lacks

6 foundation.

7 You can answer if you understand the

8 question.

9 THE WITNESS: I mean, Howard Stern is Howard

10 Stern. Like I said, I don't listen to him. I'm

11 sure the people of New York hear a lot of things

12 whether or not they're true.

13 BY MR. PHILLIPS:

14 Q If a person who worked for the campaign

15 talked about what they heard on Howard Stern related to

16 Donald Trump's own words, would that be disparaging if

17 they said, well, Donald Trump said that his sexual

18 proclivity -- more people died from sex than Vietnam

19 and Donald Trump deserved a Congressional Medal of

20 Honor because of his sexual proclivity, would that be

21 confidential information -- releasing confidential

22 information or would that be disparagement? Where

23 would that fall under the agreement?

24 MR. STONEROCK: Calls for speculation, lacks

25 foundation, incomplete hypothetical, calls for a

Page 72

1 legal conclusion.

2 John, you can ask her questions based upon

3 her personal knowledge. If you're going to

4 continue to, you know, ask her to apply the NDA to

5 specific instances, I'm going to continue to

6 object. I'm going to instruct her not to answer.

7 MR. PHILLIPS: Okay.

8 MR. STONEROCK: I mean, I've given you some

9 rope here in term of asking her to apply and

10 interpret the terms of the NDA, but she's a lay

11 witness. That is not within, you know, her

12 personal knowledge. And so if you want to

13 rephrase the question to ask if she has any

14 personal knowledge of these things, that's fine,

15 you know. I'm fine with her answering those

16 things.

17 MR. PHILLIPS: Thank you, Mr. Stonerock. She

18 signed the agreement. She's the contracting party

19 on behalf of the president, the Donald J. Trump

20 for President, Inc. She also trained on --

21 MR. STONEROCK: I don't want --

22 MR. PHILLIPS: Excuse me. Let me finish.

23 She also trained on the agreement, trained people

24 on the agreement.

25 MR. STONEROCK: You're misstating her

Page 73

1 testimony. She never said she trained somebody --
 2 anybody on the agreement.

3 MR. PHILLIPS: Didn't you train interns or
 4 discuss the agreement with interns?

5 MR. STONEROCK: Training and discussing are
 6 two different things; okay?

7 MR. PHILLIPS: Hey, let the witness answer,
 8 please. Don't coach her.

9 MR. STONEROCK: Well, ask a proper question.
 10 I mean, you want to ask a complete question.

11 BY MR. PHILLIPS:

12 Q Ms. Castellano, did you train interns about
 13 the agreement or discuss the agreement?

14 A There was no training. Training to me as an
 15 HR person is a training, going through word by word.
 16 There was no training.

17 Q Okay. There was no training. Did you have a
 18 conversation providing enlightenment or education to
 19 any employees, including interns, with Donald J. Trump
 20 for President?

21 MR. STONEROCK: Objection, vague as to the
 22 terms enlightenment or education. And you've also
 23 asked and answered similar questions on numerous
 24 occasions by this point.

25 BY MR. PHILLIPS:

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1 Q You can answer. Did you provide
 2 enlightenment or education or discussion with interns
 3 or other employees about the NDA?

4 MR. STONEROCK: Same objection.

5 THE WITNESS: If they asked.

6 BY MR. PHILLIPS:

7 Q If they asked. But we're talking about the
 8 past tense. Did they ask? Did you have these
 9 conversations?

10 A I think I answered that already.

11 Q Well, the problem is we're -- we can't even
 12 agree on what training means. Training you said means
 13 like a seminar or session. I'm talking one-on-one
 14 human resource.

15 If I have an employee who is doing something
 16 wrong, I don't need to involve the whole office
 17 sometimes. I can go to that employee and say, listen,
 18 this is what you need to do better with.

19 Isn't that training, too, one-on-one
 20 coaching?

21 MR. STONEROCK: Objection, calls for a legal
 22 conclusion, incomplete hypothetical.

23 BY MR. PHILLIPS:

24 Q Isn't one-on-one guidance training?
 25 MR. STONEROCK: Objection, vague and

Page 75

1 ambiguous as to the term one-on-one guidance.
 2 You can answer.

3 THE WITNESS: I think I already answered
 4 that. If they came to me and had a question, we
 5 discussed it.

6 BY MR. PHILLIPS:

7 Q Did they come to you?

8 A I don't recall if they came to me. You're
 9 talking five years ago.

10 Q Okay. As countersigner of the agreement and
 11 HR director for Donald J. Trump for President, is your
 12 understanding that this agreement sought to prohibit
 13 both fact statements and opinion statements about
 14 Donald Trump, the Trump campaign, his family, and those
 15 otherwise mentioned in the agreement?

16 MR. STONEROCK: Calls for a legal conclusion,
 17 incomplete hypothetical, document speaks for
 18 itself.

19 You can answer if you understand the
 20 question.

21 THE WITNESS: I really don't.
 22 You want to repeat it for me, John?

23 BY MR. PHILLIPS:

24 Q Yeah, sure. My question essentially was
 25 whether under the nondisclosure of confidential

Page 76

1 information section or non-disparagement as
 2 countersigner of the agreement and HR director for the
 3 Trump campaign, was that intended to prohibit both fact
 4 statements and opinion statements?

5 So in other words, I think Donald Trump's
 6 hair is terrible. Would that have been prohibited by
 7 the agreement?

8 MR. STONEROCK: Objection, calls for a legal
 9 conclusion, incomplete hypothetical.

10 You can answer to the extent you understand
 11 the question.

12 THE WITNESS: I mean, it's somebody's
 13 opinion. But, yes, it's negative. What you just
 14 said was negative.

15 BY MR. PHILLIPS:

16 Q So that would be -- that would be prohibited
 17 by the agreement as countersigner to the agreement?

18 MR. STONEROCK: Objection, calls for a legal
 19 conclusion, incomplete hypothetical, vague as to
 20 time.

21 BY MR. PHILLIPS:

22 Q Would that be prohibited?
 23 MR. STONEROCK: Same objections.
 24 Do you have an opinion as to whether that
 25 would be prohibited, Lucia?

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1 THE WITNESS: I don't. I'll defer to you.

2 BY MR. PHILLIPS:

3 Q Well, he's not -- I can't depose him. So let

4 me reask the question then.

5 As countersigner to the agreement, meaning

6 you signed it, as HR director and as somebody that may

7 have trained employees on the agreement, I'm trying to

8 understand, what you would have trained --

9 A There was no training on the agreement.

10 Q Okay.

11 A You have -- you keep saying training.

12 Q You said maybe you did, maybe you didn't talk

13 to people about what it meant.

14 MR. STONEROCK: John, those are two different

15 things, training and talking to people about the

16 agreement. I think she was asked and answered the

17 question numerous times about whether or not she

18 trained employees on the agreement. The answer is

19 no.

20 BY MR. PHILLIPS:

21 Q Okay. Let's find a word you're comfortable

22 with. You might have counseled individuals about the

23 agreement? You may have discussed the agreement? What

24 are you comfortable with?

25 A If someone had a question, okay, and they

Page 78

1 asked me, then we sat down and I explained them. These

2 were nondisclosure agreements prepared by legal

3 counsel.

4 And as I said, if anyone had a question about

5 them, I referred them to speak to their counsel if they

6 didn't understand something. It was pretty clear to

7 everyone who signed it.

8 Q Okay. And that's what -- if it's pretty

9 clear and you both signed it and you were -- by the

10 way, who signed your agreement? So did you sign it in

11 both places as HR director and as signatory, or did

12 somebody else sign your agreement?

13 MR. STONEROCK: Objection, relevance.

14 You can answer if you recall.

15 THE WITNESS: How could I possibly sign my

16 own agreement?

17 BY MR. PHILLIPS:

18 Q That's what I'm wondering. That's why I

19 asked the question. Do you know who signed yours?

20 A I do not. But I just signed where my name

21 was. I did not sign on behalf of the campaign.

22 Q And why is it important for somebody to sign

23 on behalf of the campaign?

24 MR. STONEROCK: Objection, calls for a legal

25 conclusion, vague and ambiguous as to the term

Page 79

1 important.

2 You can answer if you --

3 THE WITNESS: Yeah. I mean, the importance

4 of the NDA was also so that the individual would

5 be paid. Without a signed NDA, no one could work

6 for the campaign, and they would not be paid.

7 BY MR. PHILLIPS:

8 Q Are you aware that Omarosa Manigault Newman

9 was being paid before signing the NDA?

10 MR. STONEROCK: Calls for speculation, lacks

11 foundation.

12 You can answer if you know.

13 THE WITNESS: Well, I don't know what you

14 mean by being paid.

15 BY MR. PHILLIPS:

16 Q Ms. Manigault Newman was being compensated

17 before she signed the NDA. Do you have any evidence to

18 dispute that?

19 A I didn't know that.

20 Q Okay.

21 MR. STONEROCK: It's because it's not true.

22 MR. PHILLIPS: (Inaudible).

23 COURT REPORTER: I couldn't hear you, John.

24 BY MR. PHILLIPS:

25 Q I said who would have those records,

Page 80

1 Ms. Castellano, payment records?

2 MR. STONEROCK: Calls for speculation, lacks

3 foundation.

4 THE WITNESS: Who would have those records?

5 Possibly the individuals that received all of our

6 invoices.

7 BY MR. PHILLIPS:

8 Q Do you know -- as you sit here today, do you

9 know whether Ms. Manigault Newman was compensated in

10 any way by the campaign before August 20 -- do you know

11 whether Omarosa Manigault Newman was paid before she

12 signed the campaign by the campaign? Excuse me. Do

13 you know whether or not Omarosa Manigault Newman was

14 paid by the campaign before she signed her NDA?

15 MR. STONEROCK: Asked and answered.

16 You can answer again.

17 THE WITNESS: I do not.

18 BY MR. PHILLIPS:

19 Q Do you know anything about the campaign

20 finance reform laws?

21 MR. STONEROCK: Objection, calls for a legal

22 conclusion, vague and ambiguous as to campaign

23 finance reform laws. You can answer.

24 THE WITNESS: I do not.

25 BY MR. PHILLIPS:

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1 Q Do you know what the maximum contribution is
 2 that a person could give a political candidate?
 3 MR. STONEROCK: John, I think your
 4 microphone --
 5 MR. PHILLIPS: Oh, sorry.
 6 MR. STONEROCK: You hit it when you were
 7 shuffling your papers. Can you repeat?
 8 MR. PHILLIPS: Yeah, sure.
 9 BY MR. PHILLIPS:
 10 Q Ms. Castellano, do you know what the maximum
 11 donation is that a person can give a political
 12 campaign?
 13 MR. STONEROCK: Calls for a legal conclusion.
 14 You can answer if you know.
 15 THE WITNESS: I'm not sure of the number
 16 honestly.
 17 BY MR. PHILLIPS:
 18 Q Did you ever work with an individual named
 19 Noel Casler?
 20 A Noel Casler?
 21 Q Yes.
 22 A I don't recall.
 23 Q Did you ever work with an individual named
 24 David Bossie, B-o-s-s-i-e?
 25 A David was at the campaign.

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1 Q Was he at the campaign when you were at the
 2 campaign?
 3 A Yes.
 4 Q Have you been involved in any way, provided
 5 any affidavit or testimony about David Bossie or Corey
 6 Lewandowski and whether their books violated the NDA?
 7 MR. STONEROCK: Objection, calls for attorney
 8 work product and attorney-client communications,
 9 vague and ambiguous as to involved in any way.
 10 You can answer the question if you understand it.
 11 THE WITNESS: I was gone January of 2017.
 12 MR. PHILLIPS: Okay. Bear with me. The good
 13 thing about silence, it means I'm getting rid of a
 14 bunch of questions. So it may seem like dead
 15 time, but it's because I'm getting rid of things.
 16 BY MR. PHILLIPS:
 17 Q Did you work with an individual by the name
 18 of Cliff Sims on the campaign?
 19 A Cliff Sims. He was part of the campaign, but
 20 I never worked closely with this individual. I know
 21 the name. I'm not sure we even met in person.
 22 Q Okay. Were you involved in his NDA
 23 arbitration? Have you been involved with his similar
 24 case to Omarosa's?
 25 MR. STONEROCK: Calls for attorney-client

Page 83

1 privileged information, attorney work product
 2 information, vague and ambiguous as to the term
 3 involved.
 4 THE WITNESS: No, I have not. I have no
 5 knowledge.
 6 BY MR. PHILLIPS:
 7 Q Okay. Who is Jessica Denson?
 8 A Another campaign employee.
 9 Q Are you aware of her claims against the
 10 campaign involving sexual harassment?
 11 A I'm going to defer to counsel on this one.
 12 MR. STONEROCK: You can answer, Lucia, if
 13 you're aware of them or whether you're aware of
 14 them or not.
 15 THE WITNESS: There was a claim. There was a
 16 claim brought against her, but I have not been
 17 involved.
 18 BY MR. PHILLIPS:
 19 Q Okay. As countersigner to the NDA and HR
 20 director for Donald J. Trump, would it be disparaging
 21 for someone to say they were sexually harassed at the
 22 campaign if true?
 23 MR. STONEROCK: Calls for a legal conclusion,
 24 incomplete hypothetical.
 25 Are you referring to Ms. Denson's claims

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1 specifically, John?
 2 MR. PHILLIPS: No. I'm just referring -- I'm
 3 trying to figure out where the line is from the
 4 countersigner of the NDA and HR director.
 5 MR. STONEROCK: Yeah. Well, these are legal
 6 conclusions you're asking for that -- you know,
 7 these are determinations that are going to be made
 8 by the arbitrator, you know. Ms. Castellano's
 9 opinion, frankly, is not -- on the application of
 10 the NDA to specific hypotheticals which are
 11 incomplete is not relevant frankly.
 12 MR. PHILLIPS: Truthfully --
 13 MR. STONEROCK: If you want to ask her about
 14 her personal knowledge of which I think she's
 15 already said she wasn't involved in the Denson
 16 case, but on any number of subjects, go ahead.
 17 But when you're asking her to apply the agreement
 18 to hypotheticals, that's just -- that's a legal
 19 conclusion.
 20 BY MR. PHILLIPS:
 21 Q As countersigner to the agreement and HR
 22 director for the Trump campaign, would bringing
 23 truthful claims against the campaign that weren't
 24 favorable violate the NDA --
 25 MR. STONEROCK: Calls for speculation --

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1 MR. PHILLIPS: -- as you understood it?

2 MR. STONEROCK: -- lack of foundation,

3 incomplete hypothetical. There are no claims

4 against the campaign in this case, so I'm not sure

5 the relevance of this question either.

6 BY MR. PHILLIPS:

7 Q You can answer.

8 A I'm a little confused by your question

9 because you're talking about an employee making a claim

10 of sexual harassment.

11 Q Yes.

12 A That would have to be brought to the

13 attention of someone.

14 Q What do you mean?

15 A Exactly what I said. How would I know about

16 a claim of sexual harassment unless it was brought to

17 me?

18 Q Okay. So could under -- as countersigner to

19 the NDA and HR director could somebody file a lawsuit

20 for that?

21 MR. STONEROCK: Objection, incomplete

22 hypothetical, calls for a legal conclusion.

23 You can answer to the extent that you have --

24 you understand the question and you have an

25 understanding of whether or not that can happen.

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1 THE WITNESS: Well, I think -- is it the

2 person being harassed or -- you know, I'm really

3 not sure where you're going with this question.

4 So if I signed an NDA and I was being sexually

5 harassed, I should go to my superior or the HR

6 person to make the claim to let them know what was

7 taking place.

8 BY MR. PHILLIPS:

9 Q And they don't do anything. Then what

10 happens? Can you go public?

11 MR. STONEROCK: Calls for speculation,

12 incomplete hypothetical, calls for a legal

13 conclusion, vague and ambiguous as to the term go

14 public.

15 BY MR. PHILLIPS:

16 Q Can you file a lawsuit?

17 MR. STONEROCK: John, you're asking for legal

18 conclusions based upon incomplete hypotheticals.

19 I'm going to instruct the witness not to answer.

20 If you have questions about her personal

21 knowledge, then I'm happy to let her answer those.

22 BY MR. PHILLIPS:

23 Q As the person who literally signed the

24 agreement, I'm just trying to understand still what

25 rights you on behalf, you as signer and the Trump

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1 campaign, with you as HR director were trying to

2 restrict, what rights were you trying to restrict. And

3 so I'm trying to understand whether sexual

4 harassment -- is it your -- do you have an

5 understanding whether sexual harassment is confidential

6 information under the agreement?

7 MR. STONEROCK: Objection, calls for a legal

8 conclusion, incomplete hypothetical, vague and

9 ambiguous, irrelevant. There are no claims for

10 sexual harassment in this case. I'm going to

11 instruct the witness not to answer.

12 BY MR. PHILLIPS:

13 Q Is disparagement -- if someone contends they

14 were sexually harassed, as countersigner to the

15 agreement, binder for the Trump campaign, HR director

16 for the Trump campaign, do you contend that somebody

17 couldn't say that they were sexually harassed because

18 that would violate the no disparagement clause?

19 MR. STONEROCK: Same objection. I'm going to

20 instruct the witness not to answer.

21 BY MR. PHILLIPS:

22 Q Have you ever had a conversation with

23 Melania Trump?

24 A No, I have not.

25 Q Do you know whether or not the Women for

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1 Trump tour was well-funded?

2 A I don't know about the funding. I wasn't

3 involved in that aspect of the campaign.

4 Q Do you know whether or not Omarosa's outreach

5 agenda was well-funded?

6 A I do not know. I know nothing about funding

7 of each and every aspect of the campaign.

8 Q Do you know whether -- were you privy to -- I

9 guess let me ask it this way: What level of campaign

10 meetings or what type of campaign meetings were you

11 privy to?

12 A There were a lot of meetings being held, but

13 I as the HR director was not really involved. I did

14 not attend any of the strategy meetings. If there was

15 something I needed to know about, Jeff DeWit informed

16 me. But as far as joining every meeting that was held,

17 I did not.

18 Q What did you do in your average day?

19 A Aside from wrangling a bunch of college

20 students, at any given point in time there were, you

21 know, onboardings, documentation. We had hourly paid

22 individuals. Those documents needed to be submitted to

23 me, had to confirm them, send them over, reviewed

24 résumés for other potential individuals to come

25 onboard, filled out NDAs, sent documentation over to

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1 the payroll company. Some individuals, you know, would
 2 have missing checks, had to track down checks, had to
 3 track down invoices. Some people thought that I had
 4 the checkbook so I could just write out their payment.
 5 You know, if they submitted an invoice, there was a
 6 process involved there.

7 Q Do you know who currently is in your role?
 8 A I do not.

9 Q What other contracts -- you were signatory
 10 for the campaign on the NDAs. What other contracts
 11 were you signatory?

12 MR. PHILLIPS: Lucia, don't give any
 13 specifics with respect to, you know, individuals.
 14 If you have general categories of contracts.

15 THE WITNESS: I -- contract? Potentially the
 16 new hire forms.

17 BY MR. PHILLIPS:

18 Q Okay. Anything else you recall?
 19 A No, not to my recollection.

20 MR. PHILLIPS: Mr. Gordon, obviously I've got
 21 to probably ask the questions. But if you have
 22 any questions, you want to send them to me? Or
 23 you can ask me and I can repeat what you say.

24 MR. STONEROCK: John, I'm fine if he wants to
 25 ask questions.

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1 MR. PHILLIPS: Okay. Fair enough.
 2 MR. STONEROCK: We don't need to go through
 3 that process.
 4 MR. PHILLIPS: He might have gone to the
 5 bathroom.
 6 MR. STONEROCK: Seems like he's away from his
 7 desk perhaps or working on something else.
 8 MR. PHILLIPS: Well, let's do this, we've
 9 done one more hour. I think we're done and done
 10 early comparatively. So if you-all could just
 11 give me about a five- or ten-minute-break. Even
 12 after a break we're not going more than a couple
 13 of minutes. So I think we're wrapping up. But if
 14 we could just take a couple-minute break, it will
 15 help us end sooner.
 16 MR. STONEROCK: Sounds good.
 17 MR. PHILLIPS: Thanks all.
 18 COURT REPORTER: Okay. I'm pausing the
 19 recording.
 20 (Brief recess.)
 21 BY MR. PHILLIPS:
 22 Q Bear with me. There's essentially three
 23 questions that I'm going to tell you in advance just
 24 to -- where I'm distinguishing things. And the last
 25 one I just asked, so I think I know the answer. You

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1 don't remember -- what I'm going to ask you is who
 2 signed your NDA, which again you kind of answered, you
 3 don't remember, who trained you on the NDA, and
 4 explained it to you. And was there a third component,
 5 or just those two? Just those two.
 6 So who signed your NDA and who explained to
 7 you the ramifications of the NDA? Do you know either
 8 one of those -- the answer to either one of those
 9 questions?

10 MR. STONEROCK: I'm objecting to the extent
 11 that she had attorney-client communications with
 12 Michael Glassner about the NDA.
 13 MR. PHILLIPS: Okay.
 14 MR. STONEROCK: Other than that, she can
 15 answer.
 16 THE WITNESS: I do not know who signed it.
 17 But it was not -- I did not sign my own.
 18 BY MR. PHILLIPS:
 19 Q Okay. Do you remember who kind of walked you
 20 through it?
 21 A No. I think I walked myself through it.
 22 MR. PHILLIPS: Okay. And that's all I have.
 23 Thank you for your time today.
 24 THE WITNESS: Thank you. You're welcome.
 25 MR. STONEROCK: John, what do you want to do

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1 about the transcript?
 2 MR. PHILLIPS: We're going to order. I mean,
 3 the reading or waiving? She --
 4 MR. STONEROCK: Yeah, I think -- I mean,
 5 perhaps we can go off the record and talk about
 6 this.
 7 MR. PHILLIPS: Sure.
 8 COURT REPORTER: I'll end the recording now.
 9 (Witness excused.)
 10 (The witness did not waive reading and signing
 11 and the deposition was concluded at 12:13 p.m.)
 12 - - -
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C E R T I F I C A T E O F O A T H

STATE OF FLORIDA)

COUNTY OF DUVAL)

I, the undersigned authority, certify that

LUCIA CASTELLANO personally appeared before me and was

duly sworn on March 4, 2021.

WITNESS my hand and official seal this

22nd day of March 2021.

Julia Jarrett Green, RPR

Produced Identification:

New York driver's license

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March 22, 2021

Ryan J. Stonerock, Esquire
Harder, LLP
100 Park Avenue, Sixteenth Floor
New York, New York 10017

Re: Donald J. Trump for President, Inc. vs.
Omarosa Manigault Newman

Dear Mr. Stonerock:

The original errata sheet along with your transcript copy of the deposition of Lucia Castellano taken in the above-styled case are enclosed for her reading and signing. Please forward the signed errata sheet to John M. Phillips, Esquire, who has the original transcript.

If the reading and signing has not been completed within 30 days from the date of this letter, we shall conclude that the reading and signing of the transcript has been waived.

Your prompt attention to this matter is appreciated.

Sincerely,
Julia Jarrett Green
Julia J. Green

cc: John M. Phillips, Esquire

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C E R T I F I C A T E

STATE OF FLORIDA)

COUNTY OF DUVAL)

I, Julia Jarrett Green, Registered Professional Reporter and Notary Public in and for the State of Florida at Large, certify that I was authorized to and did stenographically report the deposition of LUCIA CASTELLANO; that a review of the transcript was requested; and that the transcript is a true and complete record of my stenographic notes.

I further certify that I am not a relative, employee, attorney, or counsel of any of the parties, nor am I a relative or employee of any of the parties' attorney or counsel connected with the action, nor am I financially interested in the action.

DATED this 22nd day of March 2021.

Julia Jarrett Green, RPR

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E R R A T A S H E E T

Re: Donald J. Trump for President, Inc., a Virginia not-for-profit corporation vs. Omarosa Manigault Newman

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Under penalties of perjury, I declare that I have read my deposition and that it is true and correct subject to any changes in form or substance entered here.

DATE LUCIA CASTELLANO

JJG

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