

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

THE PEOPLE OF THE STATE OF NEW YORK,

- against -

DONALD J. TRUMP,

Defendant.

Ind. No. 71543-23

**AFFIRMATION OF TODD
BLANCHE IN SUPPORT OF
PRESIDENT DONALD J.
TRUMP'S OPPOSITION TO
THE PEOPLE'S MOTION TO
"CLARIFY" THE GAG ORDER**

Todd Blanche, a partner at the law firm Blanche Law PLLC, duly admitted to practice in the courts of the State of New York, hereby affirms the following to be true under penalties of perjury:

1. I represent President Donald J. Trump in this matter and submit this affirmation and the accompanying memorandum of law in support of President Trump's opposition to the People's March 28, 2024 letter (the "Motion") asking the Court to "clarify" the March 26, 2024 gag order, to "warn" President Trump "that his recent conduct is contumacious," and to "direct him to immediately desist."

2. This affirmation and the accompanying memorandum of law are submitted upon my personal knowledge or upon information and belief, the source of which is my communications with prosecutors and with other counsel, my review of the documents in the case file, a review of the available discovery, and an independent investigation into the facts of this case.

3. I incorporate by reference all factual statements made in the accompanying memorandum of law.

WHEREFORE, for the reasons set forth in the accompanying memorandum of law,
President Trump respectfully requests that the Court deny the People's Motion.

Dated: April 1, 2024
New York, New York

By: /s/ Todd Blanche
Todd Blanche
Blanche Law PLLC
99 Wall Street, Suite 4460
New York, NY 10005
212-716-1250
toddblanchelaw.com

Attorney for President Donald J. Trump