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6 RICK J. RIZZOLO SEPARATE PROPERTY TRUST and RJR TRUST

7  
8 UNITED STATES DISTRICT COURT  
9 DISTRICT OF NEVADA

10 \* \* \*

11 KIRK and AMY HENRY,  
12 Plaintiffs,

Case No.: 2:08-CV-635-PMP-GWF

13 vs.

14 FREDRICK RIZZOLO aka RICK RIZZOLO, an  
individual; LISA RIZZOLO, individually and as  
trustee of The Lisa M. Rizzolo Separate Property  
15 Trust and as successor trustee of The Rick J.  
Rizzolo Separate Property Trust; THE RICK AND  
16 LISA RIZZOLO FAMILY TRUST; THE RICK J.  
RIZZOLO SEPARATE PROPERTY TRUST; THE  
17 LISA M. RIZZOLO SEPARATE PROPERTY TRUST;  
THE RLR TRUST; and THE LMR TRUST.

DEFENDANTS FREDERICK J.  
RIZZOLO, RICK AND LISA  
RIZZOLO FAMILY TRUST, RICK  
J. RIZZOLO SEPARATE  
PROPERTY TRUST, and RJR  
TRUST'S RESPONSE AND  
OPPOSITION TO PLAINTIFFS'  
APPLICATION (#206) FOR RICK  
RIZZOLO'S PRESENTENCE  
REPORT AND SUPERVISION  
RECORDS

18 Defendants.  
19

20 COMES NOW, Defendant FREDERICK J. RIZZOLO a/k/a RICK RIZZOLO, et al., by and  
21 through counsel of record KENNETH G. FRIZZELL, III, of the LAW OFFICES OF KENNETH  
22 G. FRIZZELL, III, and respectfully submits this response and opposition to the Plaintiffs'  
23 Application (#206) for Presentence Report ("PSR") and Supervision Records.

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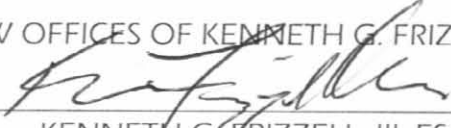
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1 This Response and Opposition is made and based the *Memorandum of Points and*  
2 *Authorities* attached hereto and made a part hereof by reference, the documents, papers  
3 and pleadings on file herein with the Clerk of the Court, and the arguments of counsel as  
4 may be adduced at hearing on the matter.

5 DATED: October 16, 2009

6 LAW OFFICES OF KENNETH G. FRIZZELL, III

7 By 

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16 RICK J. RIZZOLO SEPARATE PROPERTY TRUST  
17 RJR TRUST

18 MEMORANDUM OF POINTS AND AUTHORITIES

19 1. Statement of the Case

20 In the instant case, the Plaintiffs agreed to payment of restitution through a global  
21 *Settlement Agreement* executed in 2006. The payment becomes due at the time of the sale  
22 of the Crazy Horse Too by the Government. Should the sale thereof result in a shortfall and  
23 payment of less than the entire amount, then, and only then, does Defendant RICK  
24 RIZZOLO, become personally obligated for the balance after the shortfall.

25 The Plaintiffs now allege that the Defendants knew, before the Settlement  
26 Agreement was executed, that the sale of the Crazy Horse Too would be delayed, thereby  
27 allowing Defendants to transfer property and assets in the supposed collusive 2005 state  
28 court *Decree of Divorce*. The Plaintiffs failed to intervene in this the divorce action, and also  
failed to challenge its validity. Plaintiff's contend that the transfers of property and assets  
into separate property trusts were done so solely for the purpose of defrauding the Plaintiffs  
from receiving any payments and compensation for personal injuries pursuant to the  
Settlement Agreement.

.....

1 Plaintiffs now seek (1) creditor status, (2) a redetermination of the domestic relations  
2 community property awarded and transferred to the Defendants and to separate property  
3 trusts pursuant to a final state court Decree of Divorce, and (3) the "avoidance of the  
4 transfer . . . to the extent necessary to satisfy the creditor's claim[.]" N.R.S. 112.220(1)(a).

5 A Second Amended Complaint was filed which rendered moot a motion bringing  
6 forth issues pertaining to personal and subject matter jurisdiction, the domestic relations  
7 exception to diversity, and the statute of limitations.

8 In this most recent motion, Plaintiffs are seeking through civil discovery the release  
9 and disclosure of the Presentence Report ("PSR") in Defendant Fredrick "Rick" Rizzolo's  
10 Federal Criminal Case, 2:06-CR-00186-PMP-PAL, as well as the post-release supervision  
11 records of the Defendant in that case, ostensibly for the purpose of proving some financially  
12 based fact pertaining to the allegedly collusive divorce.

### 13 2. Standard of Review

14 Under 18 U.S.C. §3552(d) and Federal Rule of Criminal Procedure 32(e)(2), PSRs are  
15 to be provided to the defendant, the defendant's counsel, and the attorney for the  
16 Government. While this rule does not specifically address the release of the report to third  
17 parties, it is well established that PSRs are confidential documents, and there is a strong  
18 presumption against such disclosure. *United States Dept. of Justice v. Julian*, 486 U.S. 1, 12  
19 (1987) ("Courts have been very reluctant to give third parties access to the presentence  
20 investigation report prepared for some other individual or individuals."). See *In re Kenna*,  
21 453 F.3d 1136, 1137 (9<sup>th</sup> Cir. 2006); *United States v. Anzalone*, 886 F.2d 229, 233 (9<sup>th</sup> Cir.  
22 1989); *United States v. Schlette*, 842 F.2d 1574, 1584, *amended*, 854 F.2d 359 (9<sup>th</sup> Cir.  
23 1988); *Beller, et al. vs. United States of America*, 221 F.R.D. 674 (D.C. NM 2003) (PSR is not  
24 the property of litigants to disclose, but the United States Probation Department as arm of  
25 the judiciary); see also *United States v. Figurski*, 545 F.2d 389, 391 (4<sup>th</sup> Cir. 1976). As stated  
26 in *Figurski, supra*, the PSR is the property of the United States Probation Department,  
27 accordingly, the Plaintiffs should have noticed not only the Department, but also the  
28 Defendant's Federal Probation Officer as interested parties. LCR 32-2 (a) states that the PSRs

1 are "not to be reproduced or distributed to other agencies or other individuals unless  
2 permission is granted by the determining official or as mandated by statute." Even  
3 assuming Defendant or any other party legitimately has possession of a copy of the PSR at  
4 issue, this rule precludes dissemination of the report, as it is not the property of Defendant,  
5 or any other party to this action. The right to disclose, or refuse to disclose this PSR belongs  
6 to the United States Probation Department as an arm of the judiciary and interested party  
7 to the proceedings. *Id.*

8 LCR 32-2(c) allows for disclosure of the PSR, supporting documents, or supervision  
9 records upon written application and the requirements of that application. When a court  
10 is called upon to release a PSR, the court must balance the desire for confidentiality of the  
11 reports against the need for their disclosure, with "a strong presumption in favor of  
12 confidentiality", *Schlette*, 842 F.2d at 1579, and the party seeking disclosure must show a  
13 strong compelling need for disclosure, and that disclosure is required in order to meet the  
14 "ends of justice."

15 This compelling need determination is based on several factors. The party seeking  
16 disclosure must first show that the report pertains to a significant witness. *United States*  
17 *v. Strifler*, 851 F.2d 1197, 1202 (9<sup>th</sup> Cir. 1988), *cert. denied*, 489 U.S. 1032, 109 S. Ct. 1170,  
18 103 L. Ed. 2d 228 (1989).

19 Next, "a central element in the showing required of a third person seeking disclosure  
20 is the degree to which the information in the presentence report cannot be obtained from  
21 other sources. *Schlette*, 842 F.2d 1574, 1579, quoting *United States v. Charmer Indus., Inc.*,  
22 711 F.2d 1164, 1177 (2<sup>nd</sup> Cir. 1983).

23 Upon compliance with the determinative factors, and on application by a defendant,  
24 a court may release to a defendant but not to a third party what is material, relevant and  
25 probative, but not what is cumulative. *United States v. Strifler*, 851 F.2d 1197, 1202 (9<sup>th</sup> Cir.  
26 1988), *cert. denied*, 489 U.S. 1032, 109 S. Ct. 1170, 103 L. Ed. 2d 228 (1989).

27 In a civil suit arising out of a prior criminal conviction, *Beller, supra*, an unopposed  
28 motion for disclosure of PSR was denied because the parties seeking disclosure failed to

1 establish a particularized, compelling need to examine the PSR beyond the ordinary  
2 justifications for discovery in a civil suit. While the report could have contained information  
3 relevant to civil case against defendants, lack of a compelling need is not sufficient to  
4 overcome strong presumption of confidentiality. "Proof of mere relevance, economy, and  
5 efficiency will not suffice." *United States v. Charmer Indus., supra*, at 1176.

6 By inference, the Plaintiffs also contend, as the purported victims in the original  
7 Federal Criminal Case, that they require the PSR in order to ensure their right to restitution.  
8 Failure to assert the right of production under CVRA in the original criminal case in 2006  
9 and 2007 prior to Defendant Rick Rizzolo being sentenced, constitutes a waiver of same.  
10 Notwithstanding the failure of the Plaintiffs to request disclosure in the original Federal  
11 Criminal Case, *In re Kenna*, 453 F.3d at 1137, the district court rejected a victim's argument  
12 that §3771 of the CVRA confers a general right for purported crime victims to obtain  
13 disclosure of the PSR for the purpose of ensuring the availability of financial resources for  
14 payment of restitution.

15 This CVRA argument was considered in *United States v. Sacane*, 2007 WL 951666,  
16 at 1 ("The [victims] claim that without a court order compelling more detailed disclosures,  
17 the court will not have an accurate picture of the assets available for purposes of setting a  
18 payment schedule."). The court in *Sacane* noted that because the information the victims  
19 sought had already been requested by the Government, and indeed the Government was  
20 in control of the restitution issue through the forfeiture process [identical to the instant  
21 case], that disclosure to the purported victims was "not necessary" to ensure full and timely  
22 restitution. *Id.* at 2.

23 Accordingly, the standard of review supports the public interest that maintaining the  
24 confidentiality of a PSR sufficiently outweighs a civil litigant's need for the document,  
25 especially in light of the fact that discoverable information is otherwise available from non-  
26 confidential sources.

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1                    3. Analysis and Applicable Law - Civil Litigants are Not Entitled to PSR

2                    In *Beller, supra*, the unopposed motion for disclosure of PSR was denied. Failure to  
3                    establish particularized, compelling need for disclosure, beyond the ordinary justifications  
4                    for discovery in a civil suit, precluded same. While the PSR in this case may contain  
5                    information relevant to the financial claims against Defendant Rick Rizzolo, that relevance  
6                    is not sufficient to overcome the strong presumption of confidentiality.

7                    The motion is labeled "unopposed," and Plaintiffs state  
8                    that defendant United States, which has acknowledged  
9                    through counsel that it has a copy of the presentence report at  
10                    issue, takes the position that it does not object to disclosure of  
11                    the report under certain conditions. However, the presentence  
12                    report was prepared by an arm of the Court, for use by the  
13                    Court in handing down a just sentence in a criminal case. Even  
14                    assuming Defendant legitimately has possession of a copy of  
15                    the report, the report is not Defendant's to disclose or conceal  
16                    as it wishes.

17                    Rather, this Court has an independent duty to determine  
18                    whether disclosure of the presentence report under the  
19                    circumstances of this case would serve the ends of justice. The  
20                    Court finds that it would not, and the motion will be denied.  
21                    (Emphasis added).

22                    *Beller* at 674.

23                    Federal probation officers are charged with the duty of conducting presentence  
24                    investigations in criminal cases and preparing a report to be submitted to the sentencing  
25                    judge. F.R.C.P. 32; 18 U.S.C. §3552. No statutory provision or court rule strictly prohibits  
26                    disclosure of such reports to third persons. *United States v. Figurski*, 545 F.2d 389, 391 (4<sup>th</sup>  
27                    Cir. 1976). Similarly, PSRs are not within the purview of the Federal Information Act or the  
28                    Privacy Act. *Charmer, supra*. However, it has been almost universally held that, because  
29                    these reports are prepared exclusively at the direction and for the benefit of the court in a  
30                    criminal case, "it is essential that the confidentiality of such a report be protected to insure  
31                    the free flow of information." *United States v. Dingle*, 546 F.2d 1378, 1381 (10<sup>th</sup> Cir. 1976).

32                    In *Hancock Brothers, Inc. v. Jones*, 293 F. Supp. 1229 (N.D. Cal. 1968), civil plaintiffs  
33                    sought disclosure of a presentence report prepared on a corporation which pled guilty to  
34                    violations of the Sherman Act. The corporation was facing a civil suit arising from the same

1 conduct which formed the basis for the criminal prosecution. The Government, stated that  
2 it would nevertheless have no objection to making some of the material part of the public  
3 record. Despite the Government's agreement in *Hancock*, the court quashed the  
4 subpoenas, utilizing the same standard that disclosure would be proper "only if a  
5 compelling necessity has been shown with particularity." *Id.*, at 1232. The court found that  
6 the plaintiffs sought the materials basically for "the avoidance of expense and additional  
7 work," and refused the request, noting that "mere convenience is not enough to encroach  
8 upon the secrecy" of such materials. *Id.*

9 The court in *United States v. Krause*, 78 F.R.D. 203, 204 (E.D. Wis. 1978), refused to  
10 allow a judgment creditor of the defendant in a federal criminal case to have access to the  
11 defendant's presentence report, where the stated reason was to help the creditor execute  
12 on the state court judgment. The court noted that "disclosure of such reports in civil  
13 proceedings could be justified, if at all, by only the most compelling reasons." The PSR  
14 is created, not for the general use of the United States Attorney's Office or purported  
15 victims, but rather was prepared by the probation office, an arm of the judiciary, for use by  
16 the courts in sentencing proceedings. Those proceedings are of course, distinct and  
17 separate from the current civil action. The report is disclosed to the United States Attorney's  
18 office under the provisions of F.R.C.P. 32(e)(2), which requires that a probation officer give  
19 the report to the defendant, the defendant's attorney, and an attorney for the Government,  
20 prior to sentencing.

21 The weight of F.R.C.P. 32(c) and LCR 32-2, and the policies served, make plain the  
22 need for the confidentiality of PSRs. Disclosure of PSRs could be seen as Judges breaking  
23 faith with defendants, who are uniformly urged to cooperate with, and make full and  
24 truthful disclosure to, the Probation Office to assist in sentencing decisions. This would not  
25 be the case if the reports were opened to public scrutiny. *Board of Education v. Admiral*  
26 *Heating and Ventilation, Inc.*, 513 F. Supp. 600, 605 (N.D. Ill. 1981).

27 The history of F.R.C.P. 32 reflects a longstanding judicial view that confidentiality  
28 should be maintained." *United States v. Charmer, supra*, at 1173. In *United States v. Corbitt*,

1 879 F.2d 224, 229 (7<sup>th</sup> Cir. 1989) the Seventh Circuit noted, "It is clear that presentence  
2 reports have traditionally been confidential – indeed, it is only in the past 25 years that the  
3 *defendant* has had access to the presentence report, either as a discretionary matter or as  
4 of right." In the earlier version, F.R.C.P. 32 required that the parties to whom a presentence  
5 report was disclosed, including the attorney for the government, return all copies of the  
6 report to the defendant's probation officer immediately following imposition of sentence.  
7 That provision is no longer in the Rule, but the reasons for confidentiality remain present.

8 The *Corbitt* court examined the presumption of confidentiality in some detail, and  
9 listed a number of factors justifying the secrecy of presentence reports. These factors  
10 include privacy interests of the defendant, the defendant's family, the victim, and others; the  
11 "substantial interest" of the sentencing court in obtaining all information relevant to the  
12 sentencing decision; and the probability that disclosure of the report would tend to  
13 discourage the defendant and other sources from communicating information freely, thus  
14 reducing the information available to the sentencing court and adversely effecting future  
15 presentence investigations; as well as the Government's interest in maintaining  
16 confidentiality of the identity of informants and of grand jury proceedings. *Id.*, at 229-235.

17 The courts have been very reluctant to give *third parties, especially third party civil*  
18 *litigants*, access to the presentence investigation reports prepared for some other individual  
19 or individuals. One reason for this is the fear that disclosure of the reports will have a  
20 chilling effect on the willingness of various individuals to contribute information that will  
21 be incorporated into the report. A second reason is the need to protect the confidentiality  
22 of the information contained in the report. Accordingly, the courts have typically required  
23 some showing of special need before they will allow a third party to obtain a copy of a  
24 presentence report. *United States Dept. of Justice v. Julian*, 486 U.S. 1, 12, 108 S. Ct. 1606,  
25 1613, 100 L. Ed. 2d 1 (1988).

26 The Plaintiffs in this case are "third parties" to the criminal proceedings involving  
27 Defendant Rick Rizzolo. While the Plaintiffs were the purported victims of the crime, the  
28 criminal proceedings were prosecuted in the name of, and on behalf of, the United States.



1 The Plaintiffs in this case were not parties to the criminal proceedings, even though their  
2 interests were considered by the sentencing judge. This Honorable Court should take  
3 judicial notice that Defendant Rick Rizzolo has already been sentenced and his criminal case  
4 terminated.

5 The issue of disclosure to third parties most often arises in criminal cases when  
6 defendants seek access to the presentence reports of their co-defendants, or other  
7 government witnesses, for impeachment purposes. While noting that there may be  
8 instances where such disclosure might be vital to the defense, the courts almost never allow  
9 it. *See, e.g., United States v. Evans*, 454 F.2d 813, 820 (8<sup>th</sup> Cir. 1972) ("Such a claimed right  
10 is contrary to public interest as it would adversely affect the sentencing court's ability" to  
11 obtain complete information); *United States v. Greathouse*, 484 F.2d 805 (7<sup>th</sup> Cir. 1973);  
12 *United States v. Walker*, 491 F.2d 236 (9<sup>th</sup> Cir. 1974); *United States v. Figurski*, *supra*; *United*  
13 *States v. Dingle*, *supra*, at 1381 (the Tenth Circuit, quoting from another case, says such  
14 production "would . . . seriously hamper and handicap the probation investigation system");  
15 *United States v. Cyphers*, 553 F.2d 1064, 1069 (7<sup>th</sup> Cir. 1977) (noting "the critical importance  
16 of maintaining the confidentiality of presentence reports"); *United States v. Martinello*, 556  
17 F.2d 1215, 1216 (5<sup>th</sup> Cir. 1977) ("Presentence reports are not public records but rather  
18 confidential reports to the trial judge for use in his effort to arrive at a fair sentence"); *United*  
19 *States v. Anderson*, 724 F.2d 596, 598-99 (7<sup>th</sup> Cir. 1984) ("[a broad] disclosure requirement  
20 . . . would upset the delicate balance underlying Rule 32(c)(3). Confidentiality of  
21 presentence reports is vitally important to the efficacy of the sentencing process"); *United*  
22 *States v. Jackson*, 876 F. Supp. 1207, 1208 (D. Kan. 1994) (defendant's asserted need to  
23 examine a codefendant's presentence report to verify for himself that the codefendant had  
24 not been treated more leniently "is not enough to disturb the confidentiality protecting  
25 Garcia's presentencing report"); *United States v. Hart*, 1995 U.S. App. LEXIS 20203, No. 94-  
26 1005, 1995 WL 445685, at 8 (10<sup>th</sup> Cir. July 28, 1995) ("we agree with the district court that  
27 the 'extremely marginal relevance' of that information 'is considerably outweighed by the  
28 considerations of confidentiality'"); and *United States v. Ventura*, 1997 U.S. App. LEXIS

1 35614, No. 96-2148, 1997 WL 774750, at 2 (10<sup>th</sup> Cir. Dec. 17, 1997) ("Concerns about  
2 preserving the confidentiality of presentence reports, however, weight against disclosure  
3 of the report to a third party other than defendants who are the subjects of the report or  
4 their counsel").

5 On the same reasoning, courts have also disallowed, or placed sharp restraints on,  
6 disclosure of presentence reports to the news media. *See, e.g., United States v. Boesky*, 674  
7 F. Supp. 1128, (S.D.N.Y. 1987).

8 While the Court may appreciate that the production of the PSR may or may not  
9 facilitate the preparation of Plaintiffs' case, that is insufficient to justify disclosure.

10 4. Conclusion

11 Accordingly, this Court should follow the vast majority of courts which have  
12 considered this issue, as well as our own LCR 32-2, and find that in light of the strong  
13 presumption of confidentiality the Plaintiffs have failed to make a showing of the  
14 identification of a particular witness or a particularized need sufficient to overcome the  
15 presumption of confidentiality, and deny the motion to disclose in its entirety.

16 DATED: October 16, 2009

17 LAW OFFICES OF KENNETH G. FRIZZELL, III

18 By 

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28 RJR TRUST

CERTIFICATE OF SERVICE

1 I am a resident of and employed in Clark county, Nevada. I am over the age of 18  
2 years and not a party to the within action. My business address is: 509 South 6<sup>th</sup> Street,  
3 Las Vegas, Nevada, 89101.  
4

5 On October 16, 2009, I served this document on the parties listed on the  
6 attached service list via one or more of the methods of service described below as indicate  
7 next to the name of the served individual or entity by a checked box:

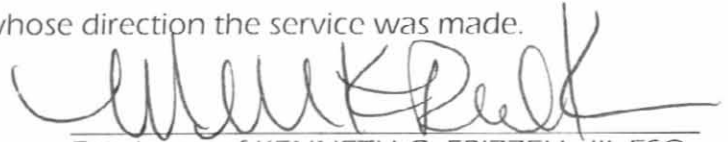
8 VIA U.S. MAIL: by placing a true and correct copy thereof enclosed in a  
9 sealed envelope with postage thereon fully prepaid, in the United States  
10 mail at Las Vegas, Nevada. I am "readily familiar" with the firm's practice of  
11 collection and processing correspondence by mailing. Under that practice,  
12 it would be deposited with the U.S. Postal Service on that same day with  
13 postage fully prepaid at Las Vegas, Nevada, in the ordinary course of  
14 business. I am aware that on motion of the party served, service is  
15 presumed invalid if postal cancellation date or postage meter date is more  
16 than one day after the date of deposit for mailing an affidavit.

13 VIA FACSIMILE: by transmitting to a facsimile machine maintained by the  
14 attorney or the party who has filed a written consent for such manner of  
15 service.

15 BY PERSONAL SERVICE: by personally hand-delivering or causing to be  
16 hand delivered by such designated individual whose particular duties  
17 include delivery of such on behalf of the firm, addressed to the individual(s)  
18 listed, signed by such individual or his/her representative accepting on  
19 his/her behalf. A receipt of copy signed and dated by such an individual  
20 confirming delivery of the document will be maintained with the document  
21 and is attached.

19 BY E-MAIL: by transmitting a copy of the document in the format to be  
20 used for attachments to the electronic-mail address designated by the  
21 attorney or the party how has filed a written consent for such manner of  
22 service.

21 I declare that under penalty of perjury under the laws of the State of Nevada that  
22 the above is true and correct. I further declare that I am employed in the office of a  
23 member of the bar of this court at whose direction the service was made.

24   
25 Employee of KENNETH G. FRIZZELL, III, ESO.  
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SERVICE LIST

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ATTORNEYS OF RECORD	METHOD OF SERVICE
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C. Stanley Hunterton, Esq. Hunterton & Associates 333 South 6 <sup>th</sup> Street Las Vegas, NV 89101	<input type="checkbox"/> Personal Service <input type="checkbox"/> Email Service <input type="checkbox"/> Fax Service <input checked="" type="checkbox"/> Mail Service <input checked="" type="checkbox"/> CM/ECF Service
J. Colby Williams, Esq. Wade W. Rabenhorst, Esq. Donald J. Campbell, Esq. Jack F. DeGree, Esq. Campbell and Williams 700 South 7 <sup>th</sup> Street Las Vegas, NV 89101	<input type="checkbox"/> Personal Service <input type="checkbox"/> Email Service <input type="checkbox"/> Fax Service <input checked="" type="checkbox"/> Mail Service <input checked="" type="checkbox"/> CM/ECF Service
Paul Hejmanowski, Esq. Lionel, Sawyer & Collins 300 South 4 <sup>th</sup> Street, #1700 Las Vegas, NV 89101	<input type="checkbox"/> Personal Service <input type="checkbox"/> Email Service <input type="checkbox"/> Fax Service <input checked="" type="checkbox"/> Mail Service <input checked="" type="checkbox"/> CM/ECF Service