EXHIBIT 7

EXHIBIT 7

EXHIBIT 7

[Page 1]

UNITED STATES DISTRICT COURT DISTRICT OF NEVADA

KIRK and AMY HENRY, NO. 2:08-CV-635-PMP-GWF Plaintiffs,

vs.

FREDRICK RIZZOLO a/k/a
RICK RIZZOLO, an individual;
LISA RIZZOLO, individually
and as trustee of The Lisa
M. Rizzolo Separate Property
Trust and as successor trustee
of The Rick J. Rizzolo Separate
Property Trust; THE RICK AND
LISA RIZZOLO FAMILY TRUST; THE
RICK J. RIZZOLO SEPARATE PROPERTY
TRUST; THE LISA M. RIZZOLO
SEPARATE PROPERTY TRUST; THE RLR
TRUST; and THE LMR TRUST,
Defendants.

Wednesday, September 28, 2011

Videotaped Deposition of VINCENT
PIAZZA, taken at the law offices of Schnader,
Harrison, Segal & Lewis, LLP, 1600 Market
Street, Suite 3600, Philadelphia, Pennsylvania,
commencing at 9:07 a.m., by and before Robin L.
Clark, Registered Professional Reporter and
Notary Public in and for the Commonwealth of
Pennsylvania.

1	APPEARANCES:		1	
2	CAMPBELL & WILLIAMS		2	STIPULATION OF COUNSEL
3	BY: DONALD J. CAMPBELL, ESQ.		3	
	and PHILIP J. ERWIN, ESQ.		4	It is hereby stipulated and agreed
4	700 South Seventh Street Las Vegas, Nevada 89101		5	by and between counsel that the
5	702-382-5222		1	
6	dcampbell@campbellandwilliams.com perwin@campbellandwilliams.com		6	certification, sealing and filing are
٠	(For the Plaintiffs)		7	waived; and that all objections, except
7 8			8	as to the form of the questions, are
	BAILUS, COOK & KELESIS, LTD.		9	reserved until the time of trial.
9	BY: MARK B. BAILUS, ESQ. 400 South Fourth Street, Suite 300		10	
LO	Las Vegas, Nevada 89101		11	THE VIDEO OPERATOR: Okay.
11	702-737-7702 mbailus@bckltd.com		12	This now begins the videotape
LIL	(For the Defendant/Cross Claimant	•	13	deposition of Vincent Piazza taken by
12	Lisa Rizzolo, The Lisa M. Rizzolo	•	14	the plaintiff in the matter of Kirk and
13	Separate Property Trust and the LMR Trust)		1	-
1.4	,		15	Amy Henry versus Fredrick Rizzolo, et
15	BUTERA, BEAUSANG, COHEN & BRENNAN BY: WILLIAM J. BRENNAN, ESQ.		16	al. in the United States District
	630 Freedom Business Center, Suite 212		17	Court, District of Nevada, case number
16	King of Prussia, Pennsylvania 19406 610-265-0800		18	2:08-CV-635-PMP-GWF.
17	wbrennan@buteralaw.com		19	This deposition is being
18	(For the Witness, Vincent Piazza)		20	held at Schnader, Harrison, Segal and
19	ALSO PRESENT:		21	Lewis, 1600 Market Street, Suite 3600,
20 21	KEN AMRHEIN, VIDEOGRAPHER		22	Philadelphia, Pennsylvania on
			23	September 28, 2011.
22 23			24	My name is Ken Amrhein from
24			25	U.S. Legal Support. I'm the video
25		[Page 2]	1	[Page 4]
		[1236 5]		
1	INDEX		1	specialist. The court reporter today
	INDEX		2	is Robin Clark also from U.S. Legal
2	WITNESS DIRECT CROSS		3	Support. We are going on the record at
3			1	9:09 a.m. Counsel will now state their
4	VINCENT PIAZZA		4	
_	BY MR. CAMPBELL: 6		5.	appearances for the record.
5	BY MR. BAILUS: 87		6	MR. CAMPBELL: Donald Jude
6			7	Campbell, Campbell and Williams, 700
7			8	South Seventh Street, Las Vegas, Nevada
8	EXHIBITS		9	89101, appearing on behalf of
9	NUMBER DESCRIPTION	MARKED	10	plaintiff.
10	Piazza 1 Subpoena 72		11	MR. BRENNAN: William
11			12	Brennan, Butera, Beausang, Cohen &
12			13	Brennan, 630 Freedom Business Center,
13			14	Suite 212, King of Prussia, PA 19406,
14	•		Π -	
15	•		15	appearing on behalf of the witness,
16			16	Vincent Piazza.
17			17	MR. BAILUS: And Mark
18			18	Bailus of Bailus, Cook and Kelesis,
19			19	Limited, 400 South Fourth Street, suite
20			20.	300, Las Vegas, Nevada 89101, appearing
			21	on behalf of Lisa Rizzolo, Lisa M.
21			22	Rizzolo Separate Property Trust and the
22			23	LMR Trust.
100			24	MR. ERWIN: Phil Erwin of
23				
24			1	
1		[Page 3	25	Campbell and Williams, also appearing [Page 5

· .		1 .	
1	on behalf of the plaintiffs.	1	Were you a named plaintiff or defendant?
2	THE VIDEO OPERATOR: Would	2	A. Meaning I was sued.
3	the court reporter please swear in the	3	Q. You were sued?
4	witness.	4	A. Yes.
5	MS. CLARK: Do you want to	5	Q. By whom were you sued?
6	raise your right hand, please? Do you	6	A. Miss Torendi.
7	swear the testimony you are about to	7	O. And what did that relate to?
8	give in this deposition will be the	8	A. It was a deal we were involved with
9	truth, the whole truth, and nothing but	9	on a piece of real estate.
10	the truth, so help you God?	10	Q. And where was that piece of real
11	THE WITNESS: I do.	11	estate?
12	THE WHITEDS. 1 do.	12	A. In Jeffersonville, Pennsylvania.
1	VINCENT PIAZZA, having been duly	13	Q. Was this developed real estate?
13		14	A. Yes. No, it's not developed. It
1.4	sworn, was examined and testified as	15	was an industrial piece.
15	follows:	16	Q. And when was, when was the occasion
16			
17	DIRECT EXAMINATION	17	before that that you gave deposition testimony?
1.8		18	A. Oh my gosh, I don't know. Back in,
19	BY MR. CAMPBELL:	19	I don't have the exact date, but it was quite a
20	Q. Good morning, Mr. Piazza.	20	ways back.
21	A. How are you doing?	21	Q. Okay. Do you remember what it
22	MR. BRENNAN: Just one	22	involved?
23	second, usual stipulations have been	23	A. It was over the baseball suit.
24	agreed to by counsel. In addition, we	24	Q. And what baseball suit was that?
25	may allow the witness to answer	25	A. We were trying to move the Giants
	[Page 6]	<u> </u>	[Page 8]
			The late of the state of the state of
1	questions which may otherwise be in	1	to Florida at the time.
2	conflict with the attorney-client	2	Q. Okay. And before that, do you
3	privilege or the attorney work product	3	recall what the matter was that you were
4	privilege with an understanding that	4	involved with in the third deposition?
5	any such permission does not constitute	5	A. I don't recall.
6	a blanket waiver of any privilege.	6	Q. Okay. Given the fact that you have
7	Correct?	7	given deposition testimony before, I'm going to
8	MR. CAMPBELL: Correct.	8	go pretty quickly through some of this prologue
9	MR. BRENNAN: Okay.	9	with respect to the protocols. If you don't
10	BY MR. CAMPBELL:	10	understand anything that I'm telling you with
11	Q. Mr. Piazza, have you ever had your	11	respect to the procedures that we're going to
12	deposition taken before?	12	be following and the obligations attending,
1.3	A. Yes.	13	please alert my and your counsel of that.
14	Q. On how many occasions?	14	We'll explore it further. Okay?
15	A. About three.	15	All right. The most important
16	Q. When was the last time you had a	16	feature of giving your statement here today is
17	deposition taken?	17	that your statement is actually testimony given
18	A. Oh, a couple of years.	18	under oath. The oath that you have just taken
19	O. What did it relate to?	19	is precisely the same oath that would be
	A. Another case that I was involved	20	administered in the United States District
20		21	Court by a judge or his designee, including the
21	with.	22	court reporter. That oath carries it with
22	Q. I presume that, what kind of a case	23	
23	was it?	1	
n 4	A. I think it was civil.	24	
24		n=	Timited States Code The most important
25	Q. All right. And were you a party?	25 71	United States Code. The most important [Page 9]

Do you understand that?

A. Yes.

1.4

Q. Okay. It's also equally important that you take all the time you feel is necessary to answer the question. Think about the question and answer the question. I'm not going to engage in any sort of abusive tactics where we demand that you answer questions on a rapid fire basis. The important part is to get your testimony correct, so think about the question before you answer it and then go ahead and answer it. Will you do that for me?

A. Yes.

Q. If you don't understand a question, it is important to alert me to the fact that

[Page 10]

Do you understand the difference?

A. Yes.

Q. All right. So simply because you cannot recall the precise words that were used, we only want generally the words that were used, if you can recall them or words to the effect. Do you understand that?

A. I'm trying to.

Q. Okay. I'm not going to have you engage in rank speculation. But I am entitled to your reasoned opinion and observations and feelings about what was taking place during a particular conversation or during a particular event based upon your experience.

Now, let me explain what the difference is. If I ask you, Mr. Piazza, what is the length of the dining room table in my home in Las Vegas, Nevada. Since you've never been in my home in Las Vegas, Nevada, let alone seen the dining room table, you have absolutely no appreciation for whether I even have a dining room table, let alone what the length of it is. Agreed?

A. That's agreed.

Q. Okay. But if I ask you ten minutes

[Page 12]

you don't understand the question. And the reason for that is, because it's likely that this will be the one and only time I'll take deposition, your testimony in this particular case. It's more likely your testimony will be given via videotape in front of the jury.

So in that regard, I want to make sure that it's complete and that we have an understanding that the question I'm asking is the question you're answering. And if you don't tell me that you don't understand the question, any protestations at a later point in time that you didn't understand are probably going to be rejected and fall on deaf ears. Do you understand that?

A. Yes.

Q. All right. During the course of your testimony, I'm going to ask you questions concerning conversations you've had. I will say what was said and by whom. The law doesn't contemplate that you will ever have an exact recollection of the precise words used in conversation. The law only contemplates that you will have a recollection of words that were used or the effect of the words that were used.

[Page 11]

later, how long was the table in the room that you just had your deposition in, you could generally say, I don't know, it looked to me about maybe 15, 20 feet, something of that nature. And the reason that you would be able to answer that question is because based upon your experience, you formed a judgment or opinion about that fact. So you understand the difference?

A. Sure.

Q. Okay. It's equally important that you understand that while there is a transcript that is being prepared and a videotape that is capturing everything, the importance of accuracy is at all times important. The court reporter has the attendant obligation to take down question, answer, question, answer. And in everyday conversation, you would be talking to people, they might ask you a question, halfway through the question, they're asking you—

A. Yeah.

Q. -- you would say to yourself, well, I know what they're asking me and you would just go ahead and answer the question before

[Page 13]

[4] (Pages 10 to 13)

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[Page 15]

1	the full question was out. There's nothing
2	improper about that. There's nothing
3	discourteous about it. It happens all the
4	time. But it does create a bit of havoc for
5	the court reporter, because she needs to have
6	question, answer, question, answer, rather than
7	half a question, answer, half a question. Do
8	you understand the difference?
9	A. Yes.
10	Q. All right. Similarly, it's

important that you give me verbal responses for the court reporter. The nodding and shaking of the head, which we engage in everyday conversation creates a little bit of a problem for the court reporter. So please indicate on the record yes and no answers rather than affirmative nodding of the head.

A. I see.

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 And negative shaking of the head for the same. I've conducted thousands of depositions in almost 35 years of practice and I can tell you, I have never had a single deposition where I didn't have to say to a witness, is that a yes or is that a no. So if I do that with you, it's not meant to be

[Page 14]

A. Correct.

O. All right. So we want your best testimony today and any changes in your testimony of substantive nature could be used to not only impeach your testimony, but cause your deposition to be taken again to be examined on those topics. Do you understand that?

A. Correct.

Q. All right. Is there anything about the procedures and protocols that I've outlined for you here today that you don't understand?

A. I believe I'm all right.

Q. Okay.

A. Okay.

Q. All right. Then I would like to begin our examination of you here today by asking how is it that you came to know Mr. Rick Rizzolo.

A. I think it was, he attended a lot of ball games out in California, the LA Dodgers. And my son was playing out there, so I would be out there quite often. So eventually, somewhere along the line, I was introduced to him, said hello, talked to him [Page 16]

discourteous or in any chastising you, it's 1 simply to remind you that we have to be 2

3 cognizant of the fact that the court reporter

has to take down affirmative responses that are 4 verbal in nature. You understand that, of 5

course?

A. Right. Q. Having given deposition testimony before, you will understand that a court reporter at the end of the deposition will prepare a transcript for your review. You're ably skilled counsel will present that to you and you have an opportunity to review that transcript and make changes. Frequently, the changes are limited by the witness to changes of spelling or things of that nature. If you make a substantive change to your testimony, for example, if this were an automobile accident and you changed your testimony from a deposition to the light being green to the light being red, that would be used to impeach your testimony. In other words, to say that you were not being truthful at one time or another. And you understand the importance of not being impeached, correct?

several times. And that was it for a while and --

O. When was the first time that you met him?

A. I don't recall the year. Mike was playing, it had to be in '94 or five.

Q. All right. And were you seated next to him when you first met him or in the general area?

A. No.

Q. That he was seated?

A. No.

O. How was it that you met him then?

A. After the game, we occasionally would talk right off the corner of the dugout to Tommy, who was a good friend of mine, Lasorda. So I used to go over and talk also, so I was there. I was introduced to him by Tommy at the time.

O. Okay.

A. And I think that's how our relationship kind of started at that point.

Q. Okay. How did your relationship develop with him?

A. It never developed. I never had a [Page 17]

> (Pages 14 to 17) [5]

			· ·
1	long standing relationship with him. Till such	1	A. No. Okay.
2	time as a situation come up in Philadelphia	2	Q in any way by not helping you
3	where an individual Romeo, I can't recall his	3	out. This individual by the name of Romeo, was
4	last name, mentioned to me that he had a piece	4	that his first name or his last name?
5	of property that he wanted to put a club there	5	A. That's his first name.
6	and he had the license. He started the	6	Q. And his last name?
7	property, but he didn't have enough money to	7	A. I don't recall.
8	finish it. And they asked me if I would be	8	Q. All right. What type of business
9	interested in getting involved with it. I said	9	did he have?
10	I don't think I have too much interest. I said	10	A. I don't know what he was doing, but
11	but I think there's a fellow you may want to	11	he was, he was trying to get this club started.
12	get ahold of out in Vegas that might be able to	12	Q. And what type of
13	help you there and might be interested and that	13	A. It was, it was a nightclub.
14	was Rick Rizzolo.	14	Q. What type of nightclub?
1.5	O. Let's see if we can identify the	15	A. It was a, it was a strip joint. I
16	general time frame within which this happened.	16	don't know what you call it.
17	When was this?	17	Q. Strip joint? Okay.
18	A. I don't know the exact time frame.	18	A. Is that the proper name? All
19	I think it's in a record where I don't have	19	right.
20	the idea I don't have the exact date.	20	Q. Where women dance topless?
21	Q. All right. Understanding that you	21	A. Yeah, that's correct.
22	can't recall with any degree of exactness or	22	Q. And this individual that was trying
23	precision, give us generally when it was. Was	23	to get a strip club had asked you to become
24 24	it in the nineties? Was it in	24	involved?
	A. It had to be in the nineties.	25	A. Yeah, that's correct.
25	A. It had to be in the inheries. [Page 18]		[Page 20]
<u> </u>		1	
1	O. This was in the nineties?	1	Q. And as a result of that
2	A. I believe so, yes.	2	A. I'm interrupting you.
3	Q. Okay. And do you recall when in	3	Q. That's okay. That's all right.
4	the nineties?	4	And in turn, you got ahold or told him to get
5	A. Was it '98? I don't recall.	5	ahold of Mr. Rick Rizzolo?
6	Q. Okay. I understand that you have,	6	A. That's correct.
7	you're present here with your counsel, Mr.	7	Q. Now, between the time that you
8	Brennan?	8	first met Mr. Rizzolo at a Dodger game and the
9	A. Yes, that's correct.	9	time that you had this first conversation with
1.0	Q. Mr. Brennan is here as your	10	him, with Mr. Romeo, what was the period that
11	attorney but he can't	11	elapsed between those two events?
12	A. Answer my questions. I know.	12	A. Repeat that.
13	Q. — answer my questions for you.	13	O. Certainly. And I'm glad that you
L -	MR. BRENNAN: I wish I	14	alerted me to the fact that you didn't
15	could, but I can't. I can't	15	understand the question. You met Mr. Rizzolo
15	THE WITNESS: I'm thinking	16	at a Dodger game?
16		17	A. Right.
μ7	he knows all the dates, because of our	18	Q. You believe to be mid nineties?
18	agreements.	19	
19	BY MR. CAMPBELL:	20	
20	Q. And he may very well?	21	- · · · · · · · · · · · · · · · · · · ·
21		3	
- 1	A. Yes.	100	
22	Q. But I need his testimony not his.	22	
22 23	Q. But I need his testimony not his.A. Okay.	23	line?
22 23 24	Q. But I need his testimony not his.A. Okay.Q. So Mr. Brennan is not being rude to	23 24	line? A. That's correct.
22 23	Q. But I need his testimony not his.A. Okay.	23 24 25	line? A. That's correct.

C 2.1	DO-CV-00033-FINE -GVVI DOCUMENT	1	7-3 Tilled 12/01/11 Fage 6 01 23
1	time elapsed between the time you first met	1	Q or so occasions, were you in the
2	Mr. Rizzolo and the time that you suggested to	2	presence of anyone else?
3	Mr. Romeo that he should contact Mr. Rizzolo?	3	A. I was, but I I was, yes.
4	A. Like two months, two, three months.	4	Q. All right. Was your son with you
5	Q. Two or three months?	5	on any of those occasions?
6	A. Yeah.	6	A. No.
7	O. So it was a relatively short period	7	Q. All right. Were any of your
8	of time?	8	business associates with you on any of those
9	A. Yes.	9	occasions?
10	Q. During that period of time, two to	10	A. No.
11	three months after you had met Mr. Rizzolo, but	11	Q. All right. Who was with you?
12	before you had referred Mr. Romeo to him, how	12	A. I was there more on my own.
ļ.	many times had you actually been in	13	Q. On your own?
13		14	A. Yes.
14	Mr. Rizzolo's presence?	15	Q. And when you went to Las Vegas,
15	A. Not many. Four or five times.	16	Nevada, did you stay in any particular hotel?
16	Q. And where were you in his presence	17	A. I did, yes.
17	at?	18	Q. And what hotel was that?
18	A. I might have visited the club one	19	A. I don't recall the name of it — I
19	time out in Vegas.	20	don't recall the name of the hotel.
20	Q. All right. On how many occasions	1	
21	did you visit Mr. Rizzolo at his club in Las	21	Q. Okay. And was it always the same
22	Vegas?	22	hotel?
23	A. No more than three.	23	A. I don't recall.
24	Q. And in that regard, we're talking	24	Q. Okay. When you visited
25	about the Crazy Horse Too strip club? [Page 22]	25	Mr. Rizzolo, did you discuss business with him? [Page 24]
	[rage zz]	-	1,,-
1	A. That's correct.	1	A. I was there just to see what his
2	Q. And when you visited Mr. Rizzolo at	.2	operation looked like and try to get some
3	his club in Las Vegas, Nevada, this would have	3	answers as to what, how that business run and
4	been in the mid nineties?	4	that was about it.
5	A. I think so.	5	O. Had Mr. Rizzolo prior to your
6	Q. Okay.	6	referral of Mr. Romeo to him, had Mr. Rizzolo
7	A. I'm not sure.	7	offered you any sort of business opportunity
8	Q. That's okay. That's all right. We	8	with respect to nightclubs?
9	just want your best recollection. And you say	9	A. No.
1	that you visited him there while you were in	10	O. So you were just generally
10 11	Vegas or did you go there for the express	11	interested in the gentlemen's club business and
	purpose of meeting with Mr. Rizzolo?	12	were seeking to learn more about it?
12	A. I think I went out to see what he	13	A. That's correct.
13	was doing with that operation he had there.	14	Q. All right. Was your son a friend
14	Q. And why did you want to see what	15	of Mr. Rizzolo's?
15	Mr. Rizzolo was doing with his operation in Las	16	A. I believe so.
16		17	Q. Do you know whether or not your son
17	Vegas?	18	visited Mr. Rizzolo at his club?
18	A. Well, the fact that I had interest	19	
19	possibly in the club in Philadelphia, seeing if	20	
20	I would want to get involved with that	21	
21	operation.	22	
22	Q. Okay. When you visited Mr. Rizzolo	23	
23	in Las Vegas, Nevada and more specifically,	24	
24	visited him at his club on those three	25	
25	A. Yes.	- 1	[Page 25]

			
1	interviewed by any special agent of the Federal	1	business with Mr. Romeo, whose last name?
	Bureau of Investigation regarding Mr. Rizzolo?	2	A. Yeah, right.
3	A. I don't think so.	3	Q. I'm calling him Mr. Romeo, but that
4.	Q. Do you know whether or not you or	4	was his first name.
5 .	any family member were ever picked up on a	5	A. Right, right.
6	wiretap, that is to say, for the subject of an	6	Q. Was Mr. Romeo's approach to you,
7	authorized interception over the phone by the	7	first approach on the business, before or after
8	United States Department of Justice?	8	you met Mr. Rizzolo for the first time at
9	MR. BAILUS: Objection as to	9	Dodger stadium?
.0	form.	10	A. Repeat that question.
.1	MR. BRENNAN: You can	11	Q. All right. When Mr. Romeo
.2	answer, Vince.	12	approached you for the first time about getting
.3		13	involved in a strip club business, was that
.4		14	approach that he made to you before or after
L5	BY MR. CAMPBELL:	15	you met Mr. Rizzolo for the first time?
L6		16	A. I believe it was before.
L7	between withdraw. In the months that	17	Q. Okay. So serendipitously or just
18	elapsed between the time that you first met	18	by happenstance, you had met Mr. Rizzolo after
19	Mr. Rizzolo at the Dodger game and the time	19	Mr. Romeo had presented you with this business
20	that you referred Mr. Romeo to him, had you	20	suggestion and it developed from there?
21	ever had dinner with him?	21	A. I think that's right.
22	A. Yes.	22	Q. All right. Did you ultimately
23	Q. Where?	23	share with Mr. Rizzolo the fact that Mr. Romeo
24	A. I don't recall the name of the	24	had approached you?
25	club — the restaurant.	25	A. Yes.
	[Page 26]		[Page 28]
	0. 0. 1	1	Q. And did you share with him the fact
1	Q. On how many occasions?	2	that Mr. Romeo wanted to get involved in the
2	A. I believe two.	3	strip club business at a particular location in
3	Q. And was one of those occasions in	4	Philadelphia?
4	southern California?	5	A. Yes.
5	A. No.Q. Where did you have dinner with them	6	MR. BAILUS: Objection as to
6		7	form.
7	at on the two occasions?	8	BY MR. CAMPBELL:
8	A. In Vegas.	9	Q. And had Mr. Romeo been involved in
9	Q. Where in Las Vegas?A. I don't remember the restaurant.	10	a strip club business before he made this pitch
10	O. Was it an Italian restaurant?	11	to you?
11	~	12	A. I don't know.
12	A. Yes.	13	Q. Did you know Mr. Romeo before he
13	Q. Was it known as Pierro's?	14	made his pitch to you?
14	A. That's correct.	15	A. Not that well.
15	Q. Did you meet a friend of Mr. Rizzolo's by the name of Freddie Glusman?	16	Q. When you say not that well, that
16	•	17	indicates to me that you knew him at least
17	A. No.	18	marginally in some manner?
18	Q. Did you meet the owner of Pierro's	19	A. That's correct.
19	Restaurant?	20	Q. How was it that you knew Mr. Romeo?
	A. I would not be able to recall.Q. Do you know who Mr. Freddie Glusman	21	A. He heard of me and someone brought
20	U. DO VOII KNOW WHO IVIT, FIEDDIE GRUSINAU		him up to my office and discussed what he would
21		. 22	
21 22	is?	22	like to do with the club. It was a business
21 22 23	is? A. I have no idea.	23	like to do with the club. It was a business
21 22	is?		like to do with the club. It was a business that he wanted to get involved with. Q. Okay. Did you ultimately get

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involved in a club with Mr. Romeo?

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- A. Yes, originally, he was involved, Romeo.
- Q. And tell me what the business arrangement was that was originally contemplated with Mr. Romeo?
- A. Well, he had the license and the property tied up at that time. And that's when he was talking about trying to put the deal together and that he was looking for investors. So that's when I mentioned to him to, I thought mentioned to him about Rizzolo. I said this is a gentleman I think you ought to see. He's very successful in what he's doing out there, maybe he could help you. And from there, he must have gotten -- he did get ahold of him and he came east and they talked about that situation for a while.
 - O. Mr. Rizzolo came east?

A. Yes. And they were thinking about doing something. And that's when Rick said to me, would you want to be involved. I said I don't know. I'd have to think about it, because I don't know if I wanted to be in that business. And I said if it would - if I were

think John, I think his name was John, they came in and started, when we had the club built. I think it was John and some of the other employees he had sent out, they were running the club. But Rick was acting as a consultant, because he could not get on the -he was not allowed to be on the license or on the property.

So as things went along, I come to find out that he was having problems. And we needed to know where he was going to go with it, because I don't know what was happening, but he said, hey, I need to make some sort of an arrangement here, because I need to move on. Because of a situation with the law that he was having with the case that started. And I said, Rick, I don't know what to do. I don't know how to run this club, I said, but let me see if I can do something with it, try to sell it and I want to get out of it. I don't want to be part of this.

So fortunately, I got ahold of a company - well, they came to me, it was Rick's Cabaret. And I mentioned to him that this is what I'm doing. I got this deal. It's a

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to get involved, I would like to be it in a short time and get out of it. If there's some 2 way that I can make a profit and get out in a 3 startup. Because I thought maybe it could be 4 sold right away and that was my thought in the 5 back of my head was to get, if it were that 6 way, I would be in and out real quick. And 7 that's where we started at that point, as to 8 9 build a club.

> We had plans that were drawn up, you know, built up, and built the building and that was kind of my involvement. I was there helping to see that the building was getting built properly, because Rick was on the west coast and Romeo didn't know too much about the construction business. So, and I had a little experience in that.

So then as the deal started to get moving along, Romeo, he was taken out of the deal. And then I come to find out that as we got started, that Rick could not go on the license. So then I was left with all of the problems here to put this thing together. And which I was not very comfortable with. We operated for -- they started, his nephew I

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1 possibility. We can get out of this thing. I said here's the numbers. I don't know how good 2

the deal is going to be, but they want to 3

operate over a period of time, to see if they 4

5 want to stay in the club. And at that moment,

I don't recall if I bought Rick out at that 6

7 moment. Because I think he was mentioning that

he was in real trouble with the law out there 8

9 and he might go to jail or something of that

sort. So and the rest of it is in the records. 10

I don't know exactly what we did as far as 11

paperwork and settlement and all of that, but I 12

ended up with the club, which I was very 13

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unhappy to have. Because it was losing money,

big time money.

And I cut a deal with, they were originally going to, I'm talking about Rick's Cabaret, Rick's Cabaret, the public company that entered into an agreement with me to take the club. And for a period of time, they said they're going to go in and settle, but unfortunately, they wanted more time. And in the interim, they're running the club.

Q. Rick's Cabaret?

A. They were running the club, yeah,

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basis.

as the operator, just to see if they can get the business going or wherever. They thought it was going to be a nice club and all that, but unfortunately, they were losing money.

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And from the original deal that they gave me as to what the put would be on the stock and all that escrow going over that, it was losing a lot of money. I'm pumping money in there more than I would like to be involved with. But unfortunately, that happened.

But then, we finally got a deal together where the put was like \$23 on the stock, made that arrangement to where I told Rick, this is where we're at with --

O. Rick Rizzolo?

A. Rick Rizzolo, yeah, I said this is the amount of money and I don't know whether he was — I don't think he was on the property. So I had to cut a deal with them originally, I'm talking about Rick's Cabaret now, that where I would end up being out of the deal completely, but then they came back and said, look, we can't put all the money up, we have to do a stock deal. You have to stay in on the real estate.

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totally involved with that. My accountant and
 Mr -- is it Mr. Stu Cohen understands the deal
 very well.
 And do you have an in-house

concerned about that now, because they closed a

few clubs, and the stock is down to seven

I'm a little nervous of the fact of whether

we're going to get all the money, but thank

God, so far they have been paying on a timely

And unfortunately, I hear that

made or documents were that we would -- Rick

sent us to say something happened to the estate

planning that he had and he wanted us to do

something to send the stock to or the, yeah,

the stock to another party. But I don't recall

all of what happened there, but my in-house

I understand that there was some funds that

the last three or four payments in this, the

last couple of months of the -- of our deal

there. So I'm certain that that got squared

away. I'm not too sure. I believe it is an

understanding of what had happened. I'm not

counsel and attorneys were handling that. And

were to go to a certain place and we sent them

to him or her and we shouldn't have done that,

something occurred where some transactions were

dollars and they're paying us 23 on the put.

I'm saying how long is this going to last. So

Q. And do you have an in-house accountant or attorney that handles this for you?

A. Yes.

O. And who is that?

A. Rich Orlow.

Q. Okay. Having given us that narrative answer, I would like to explore some of the particulars.

A. Sure.

Q. You say that Mr. Rizzolo could not be licensed?

A. Right.

Q. And do you know the reason why he could not be licensed?

A. I do not know the reason.

Q. All right. How is it that you learned that he could not be licensed?

A. He might have told me.

Q. And because he could not be licensed, he was a consultant?

A. That's correct.

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I got a little aggravated over 1 the fact that I'm making a deal here and I 2 3 can't get my money out, but I had to go along with it. I'm taking -- I'll take the best deal 4 I could possibly make. So they were the 5 arrangements that we made where, fortunately, 6 his money would have come out of the stock and 7 8 mine at the same time. We would draw down 5,000 a month or whatever it might have been. 9 It's in the books. I don't have the exact 10 numbers. I have people that do all of the 11 bookkeeping for me and all of the accounting. 12 So I'm certain that it's all there as to what 13 you need to find out about that portion of the 14 15 operation.

So finally, we got to a settlement and I think our rent factor at that time was supposed to be \$25,000 apiece, we would receive out of the rent. Then they were operating for about a year, and they cut me back to about 15,000. He said he can't make it, they might close it. I'm hoping like hell that this thing keeps going. I had to do whatever we could do to keep it going, so we could get our stock out. And I'm a little

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[10] (Pages 34 to 37)

the operation and management of the business? A. Yes. Q. All right. Tell me all that he did in that role? A. At that particular time, he did very little. I think he only visited there one it time. And after that, he was having his problems with the law. So he said he couldn't - he had to get out of the deal. And that's when I was doing all I could in order to get it sold. Now, prior to that, before I got involved with Rizzolo, I had a friend in our area, John Durante, he passed away, God bless in is soul, and he's a sheriff and he has been there a long time and I asked him if he can do about going in with him as to what they could find out on Rizzolo, his background. And apparently, at the time, John told me there was going way back, back in '93 or four, somewhere in that area, when I talk about when I started to I Page 381 1 put this deal together. Tri not sure on the dates, but I did have, someone told me that he dates, but I did have, someone told me that he dates, but I did have, someone told me that he dates, but I did have, someone told me that he dates, but I did have, someone told me that he dates, but I did have, someone told me that he dates, but I did have, someone told me that he dates, but I did have, someone told me that he dates, but I did have, someone told me that he dates, but I did have, someone told me that he dates, but I did have, someone told me that he dates, but I did have, someone told me that he dates, but I did have, someone told me that he dates, but I did have, someone told me that he dates, but I did have, someone told me that he dates, but I did have, someone told me that he dates, but I did have, someone told me that he dates, but I did have, someone told me that he dates, but I did have, someone told me that he dates, but I did have, someone told me that he dates, but I did have, someone told me that he dates, but I did have, someone told me that he dates, but I did have, someone told me that he dates, but I did have, someone told me that he dates, but I did have, someone	1	O. And what he was a consultant on was	1	BY MR. CAMPBELL:
A Yes. Q. All right. Tell me all that he did in that role? A. At that particular time, he did very little. I think he only visited there one time. And after that, he was having his problems with the law. So he said he couldn't — he had to get out of the deal. And that when I was doing all I could in order to get it sold. Now, prior to that, before I got nivolved with Rizzolo, I had a friend in our tere a long time and I asked him if he can do a b a background check to see what this was that— I'm going back then when I started to think about going in with him as to what they could find out on Rizzolo, his background. And apparently, at the time, John told me there was nothing they could find on him. Now this is going way back, back in '93 or four, somewhere in that area, when I talk about when I tined to going way back, back in '93 or four, somewhere in that area, when I talk about when I tined to Mr. Rizzolo was clean was who? A. M. O. Q. Did you come to learn at a later point in time that Mr. Rizzolo was a well-known associate of organized crime figures? MR. BAILUS: Objection as to form. MR. BARLUS: Objection as to form. MR. CAMPBELL: You can answer. HE WITNESS: No, I. didn't — I had no idea. BYMR. CAMPBELL: Objection as to form. MR. BRENNAN: Objection. MR. BRENNAN: Objection. THE WITNESS: I heard— [Page 40] MR. BRENNAN: Okay. When we object to the form, Mr. Piazza, you're allowed to answer. We're preserving an objection, I'm sorry? A. He passed away. Q. And what happened to Mr. Durante? A. He passed away. A. R. CampBell.: Do you have an objection, I'm sorry? A. He passed away. A. R. CampBell.: Do you have an objection, I'm sorry? A. He passed away. A. R. CampBell.: And that's MR. BRENNAN: Objection as to form. MR. BRENNAN: Objection MR. BRENNAN: Okay. When we object to the form, Mr. Piazza, you're allowed to sawwer. We're preserving an objection to the question, because at least in my mind, I don't know what is meant by organized crime figures? MR. BALUS: Objection as to form. MR. BR	1		2	O. When this background investigation
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	•	1	P.
1	out. And I says, geez, I can't afford to do it	1	MR. CAMPBELL: And I'm
2	at the moment. But I said give me an	2	entitled to do that.
3	opportunity to try to find out if I can get a	3	MR. BRENNAN: I'm trying to
4	buyer. And I was then negotiating with a	4	figure well, I'm trying to figure
5	couple of people thinking they would take the	5	out if that's all right.
6	club. And then unfortunately, they didn't want	6	MR. CAMPBELL: Well, it's
7	to pay the money we thought we needed to have	7	just to the form of the question, you
8	to get out. And I called him on several	8	made the objection.
9	occasions telling him what the status was or	9	MR. BRENNAN: Well, I have,
10	what I was doing.	10	but I do think that it is
11 .	And I mentioned to him that this	11	MR. CAMPBELL: That's a
12	other situation came up with Rick's Cabaret.	12	speaking objection.
13	And then I told him about exactly what was	13	MR. BRENNAN: Well, I object
14	going on with that. And you know, the rest, I	14	to the form of the question.
15	think I repeat myself today what exactly	15	MR. CAMPBELL: Okay.
16	occurred thereafter with the deal that I did	16	MR. BRENNAN: And I would
17	with Rick's Cabaret.	17	request respectfully that you not try
18	Q. When he informed you of his	18	to, you know, suggest answers to
19	problems, you understood that he was in that	19	Mr. Piazza. He's here to tell you what
20	his problems were criminal in nature, that he	20	he remembers as truthfully and as
21	was being charged with criminal activity?	21	accurately as upon and I don't think it
22	A. He didn't tell me that. He didn't	22	helps you or the jury or the court to
23	tell me what the charges were or what it was.	23	try to suggest things to him.
24	He said he had he had to defend his case and	24	MR. CAMPBELL: Okay. I'm
25	you know, he was being - he told me something	25	going to ask that the speaking
	[Page 46]	1	[Page 48]
			11
1	about being charged. I don't know what it was,	1	objection of counsel be stricken from
2	but I just don't recall. But I knew he had a	2	the record. I would like to preserve
3	problem and he was telling me he had the	3	this separately on a disc and I'll be
4	problem. But I didn't discuss any of that with	4	moving for instruction to the jury
5	him, because I didn't feel as though it was my,	5	based upon the instructions or based
6	my responsibility or	6	upon the commentary that has been made
7	Q. My question was just a little bit	7	by Mr. Piazza's counsel at this time.
8	different.	8	Your objection is noted. Do you
9	A. Yeah.	9	understand the question?
10	Q. And I'm sure it's because I didn't	10	THE WITNESS: Repeat the
11	ask it with	11	question.
12	 A. Maybe I didn't understand you. 	12	BY MR. CAMPBELL:
h ~			
13	Q. I didn't ask it with or craft it	13	Q. Sure. You understood that this was
14	Q. I didn't ask it with or craft it with precision. In any event, you understood	14	a criminal case as opposed to a civil case, in
14 15	Q. I didn't ask it with or craft it with precision. In any event, you understood that this problem, this case that he was	14 15	a criminal case as opposed to a civil case, in other words, that it involved some problem with
14 15 16	Q. I didn't ask it with or craft it with precision. In any event, you understood that this problem, this case that he was involved in	14 15 16	a criminal case as opposed to a civil case, in other words, that it involved some problem with the government as opposed to some civil
14 15 16 17	Q. I didn't ask it with or craft it with precision. In any event, you understood that this problem, this case that he was involved in A. Yes.	14 15 16 17	a criminal case as opposed to a civil case, in other words, that it involved some problem with the government as opposed to some civil lawsuit?
14 15 16 17	Q. I didn't ask it with or craft it with precision. In any event, you understood that this problem, this case that he was involved in A. Yes. Q was as opposed to a civil	14 15 16 17 18	a criminal case as opposed to a civil case, in other words, that it involved some problem with the government as opposed to some civil lawsuit? A. Yes.
14 15 16 17	 Q. I didn't ask it with or craft it with precision. In any event, you understood that this problem, this case that he was involved in A. Yes. Q was as opposed to a civil lawsuit, was a case involving the federal 	14 15 16 17 18	a criminal case as opposed to a civil case, in other words, that it involved some problem with the government as opposed to some civil lawsuit? A. Yes. MR. BAILUS: Objection as to
14 15 16 17 18 19 20	Q. I didn't ask it with or craft it with precision. In any event, you understood that this problem, this case that he was involved in A. Yes. Q was as opposed to a civil lawsuit, was a case involving the federal government and criminal charges?	14 15 16 17 18 19 20	a criminal case as opposed to a civil case, in other words, that it involved some problem with the government as opposed to some civil lawsuit? A. Yes. MR. BAILUS: Objection as to form.
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14 15 16 17 18 19 20 21 22 23	Q. I didn't ask it with or craft it with precision. In any event, you understood that this problem, this case that he was involved in A. Yes. Q was as opposed to a civil lawsuit, was a case involving the federal government and criminal charges? MR. BRENNAN: Objection, you're leading the witness. MR. CAMPBELL: That's	14 15 16 17 18 19 20 21 22 23	a criminal case as opposed to a civil case, in other words, that it involved some problem with the government as opposed to some civil lawsuit? A. Yes. MR. BAILUS: Objection as to form. BY MR. CAMPBELL: Q. Did you — were you ever contacted by any attorneys on behalf of Mr. Rizzolo at
14 15 16 17 18 19 20 21 22 23	Q. I didn't ask it with or craft it with precision. In any event, you understood that this problem, this case that he was involved in A. Yes. Q was as opposed to a civil lawsuit, was a case involving the federal government and criminal charges? MR. BRENNAN: Objection, you're leading the witness. MR. CAMPBELL: That's exactly right, I am.	14 15 16 17 18 19 20 21 22 23 24	a criminal case as opposed to a civil case, in other words, that it involved some problem with the government as opposed to some civil lawsuit? A. Yes. MR. BAILUS: Objection as to form. BY MR. CAMPBELL: Q. Did you — were you ever contacted by any attorneys on behalf of Mr. Rizzolo at any time on any matter?
14 15 16 17 18 19 20 21 22 23	Q. I didn't ask it with or craft it with precision. In any event, you understood that this problem, this case that he was involved in A. Yes. Q was as opposed to a civil lawsuit, was a case involving the federal government and criminal charges? MR. BRENNAN: Objection, you're leading the witness. MR. CAMPBELL: That's	14 15 16 17 18 19 20 21 22 23 24 25	a criminal case as opposed to a civil case, in other words, that it involved some problem with the government as opposed to some civil lawsuit? A. Yes. MR. BAILUS: Objection as to form. BY MR. CAMPBELL: Q. Did you — were you ever contacted by any attorneys on behalf of Mr. Rizzolo at

1	Q. Okay. You met Mrs. Rizzolo on	1 2	A. He had two others that were working there.
	occasion?	3	Q. And they had worked at the Crazy
3	A. Once or twice.	4	Horse Too in Las Vegas?
4	Q. Where did you first meet	5	A. Yes, that's correct. I don't
	Mrs. Rizzolo?	6	recall their names. I let the one go, I
6	A. I don't recall. It might have been at the restaurant.	7	understood the managers we had in place
7		8	indicated there might have been some
8	Q. In Las Vegas?A. Yes.	9	wrongdoing. I don't know what it was all
9		10	about. But I don't have their names. I really
10	and Mrs. Rizzolo at the restaurant, did you	11	don't know their names.
11	have anyone with you from your family?	12	Q. During the period of time that you
L2	MR. BAILUS: Objection as to	13	were involved in this business enterprise
L3		14	A. Yes.
L4	form. THE WITNESS: No.	15	O with Mr. Rizzolo
L5		16	A. Yes.
16	BY MR. CAMPBELL:	17	Q did you learn that there was an
17	Q. On — did you meet with	18	indictment returned by the federal grand jury
18	Mrs. Rizzolo on other occasions?	19	in Las Vegas which named Mr. Rizzolo and many
19	A. No.	20	of his managers and employees?
20	Q. Her name was Lisa?	21	A. I heard something —
21	A. Lisa, I recall now that you	22	MR. BAILUS: Objection as to
22	mentioned it.	23	form and also exceeds the court's
23	Q. Did you meet any of his children?	24	order
24	A. I met one of his boys at one time.	25	THE WITNESS: I heard
25	Q. Dominic? [Page 50]		[Page 52]
		+	
1	A. Dominic, yeah, I believe so,	1.	MR. BAILUS: regarding
2	Dominic, yeah.	2	discovery.
3	Q. Dominic was back here?	3.	THE WITNESS: something,
4	A. Here in the east?	4	I didn't know exactly what it was all
5	O. Yes.	5	about.
6	A. No, he was, he was at the	6	BY MR. CAMPBELL:
7	restaurant.	7	Q. How did you hear that Mr. Rizzolo
8	O. Okay. All right. Let's talk a	8	and some of his managers had been indicted?
9	little bit about the individuals that came back	9	MR. BAILUS: Objection as to
10	here. Do you know an individual by the name of	10	form and exceeds the court's order
11	Mr. Belacastro?	11	regarding discovery.
12	A. No.	12	THE WITNESS: He might have
13	Q. All right. The individuals that	13	told me.
14	Mr. Rizzolo brought back here to run the club,	14	BY MR. CAMPBELL:
15	how many of them were there?	15	Q. Okay. Were any of the individuals
16	MR. BAILUS: Objection as to	16	that Mr. Rizzolo put into the club back here in
17	form.	17	Philadelphia named in that indictment?
		18	MR. BAILUS: Objection as to
18	THE WITNESS: I think there		form and it exceeds the court's order
18 19	THE WITNESS: I think there was three.	19	form and it exceeds the court's order
19	was three.	19 20	regarding the discovery.
19 20	was three. BY MR. CAMPBELL:	i	
19 20 21	was three. BY MR. CAMPBELL: Q. All right. And do you recall their	20	regarding the discovery. THE WITNESS: I think he
19 20 21 22	was three. BY MR. CAMPBELL: Q. All right. And do you recall their names?	20 21	regarding the discovery. THE WITNESS: I think he mentioned John, one no, John, I
19 20 21 22 23	was three. BY MR. CAMPBELL: Q. All right. And do you recall their names? A. I only knew John by his first name,	20 21 22	regarding the discovery. THE WITNESS: I think he mentioned John, one no, John, I think that was the only one I know of.
19 20 21 22 23 24	was three. BY MR. CAMPBELL: Q. All right. And do you recall their names? A. I only knew John by his first name, his nephew or cousin or something like that.	20 21 22 23	regarding the discovery. THE WITNESS: I think he mentioned John, one no, John, I think that was the only one I know of. BY MR. CAMPBELL:
19 20 21 22 23	was three. BY MR. CAMPBELL: Q. All right. And do you recall their names? A. I only knew John by his first name,	20 21 22 23 24 25	regarding the discovery. THE WITNESS: I think he mentioned John, one no, John, I think that was the only one I know of. BY MR. CAMPBELL:

1	the management team after they were indicted?	1	A. Steve Miller, somebody back there,
2	MR. BAILUS: Objection as to	2	yeah, mentioned being in a paper and a couple
3	form	3	of articles. And he mentioned his situation I
4	THE WITNESS: No, they went	4	think a little bit about that case or and I
"	back	5	did hear it. I don't know exactly where, bits
5	MR. BAILUS: And exceeds the	6	and pieces of it.
6		7	Q. Did you talk to Mr. Rizzolo about
7	court order regarding new discovery.	l	- 13
8	THE WITNESS: They went back	8	it?
9	to Vegas.	9	A. No.
10	DI WHE CHANDED	10 .	Q. When is the last time you spoke to
11	Q. Duj ugum.	11	Mr. Rizzolo?
12	 A. They went back to Vegas right after 	12	A. I think it was just before he had
13	that.	13	to go to jail.
14	Q. So as soon as they were indicted,	14	Q. And did you speak to him in person?
15	they quit or were terminated?	15	A. I believe it was on the phone. He
1	A. Terminated, yes.	16	didn't come east.
16	MR. BAILUS: Objection as to	17	Q. So you were back here in
17		18	Philadelphia?
1.8	form. It exceeds the order of regular	1	"
19	discovery.	19	A. Yes.
20	BY MR. CAMPBELL:	20	Q. He was in where?
21	Q. Who terminated?	21	A. Probably Vegas.
22	 A. I think I might have told them, the 	22	Q. Did you ever speak to him while he
23	manager we had in place then, to let them go,	23	was in prison?
24	because of the situation.	24	A. No.
25	Q. Who was it?	25	Q. Okay. Did you ever speak to his
Γ	[Page 54]		[Page 56]
l			
1	A. I forget his name, the manager	1	wife after he was incarcerated?
2	there.	2	MR. BAILUS: Objection as to
3	Q. Okay. So you found out they were	3	form.
4	indicted and you told your manager tell them	4	THE WITNESS: She might
l l		5	have, she might have called one time.
5	they have got to leave?	6	I'm not certain now.
6	A. Yes, right.	1 -	
7	MR. BAILUS: Objection as to	7	BY MR. CAMPBELL:
8	form, exceeds the scope of new	8	Q. This is Lisa Rizzolo?
9	discovery.	9	A. Yes.
10	BY MR. CAMPBELL:	10	Q. Okay. And after Mr. Rizzolo was
11	Q. Do you know what this case is	11	incarcerated, Lisa Rizzolo called you on the
1.2	about, why you're being deposed?	12	phone to discuss what topic?
13	A. No.	13	MR. BAILUS: Objection a to
14	O. Were you aware that Mr. Rizzolo was	14	form. Exceeds the scope of new
	responsible for paying a judgment to a	15	discovery and exceeds the scope of this
15		16	case.
16	gentleman who was made a paraplegic or a	17	THE WITNESS: I don't
17	quadriplegic?	1	_
18	MR. BAILUS: Objection as to	18	know
19	form. Exceeds the scope of new	19	MR. CAMPBELL: Okay. Make
20	discovery.	20	your objection and let me know when
21	THE WITNESS: I heard it and	21	it's done. Okay. Because I think it's
22	read it, that gentleman who writes the	22	being. It's difficult for the witness
23	paper or something, Miller.	23	and me and it disrupts the record.
24	BY MR. CAMPBELL:	24	I'll also note that you can
	Q. Steve Miller?	25	
25	A. PICAC IATITICI ([Page 57]
	[Page 55	7 1	· . IFace 37

	· · · · · · · · · · · · · · · · · · ·		
1	entire matter that you think exceeds	1	you just stated about any feelings you
2	the scope, but I'll note for the record	2	may have concerning discovery that has
3	that, that Miss Rizzolo's involvement	3	taken place. And again, I move to
4	and your firm's involvement was	4	strike that.
5	withheld from us for a period of three	5	BY MR. CAMPBELL:
6	years and	6	Q. So what did Lisa Rizzolo say to you
7	MR. BAILUS: Mr. Campbell	7	in this telephone conversation that took place
8	MR. CAMPBELL: Excuse me,	8	after Mr. Rizzolo was incarcerated?
9	excuse me	9	MR. BAILUS: Objection as to
		10	form.
10	MR. BAILUS: I'm going to	11	THE WITNESS: I believe it
11	object to all this	12	was with regards to the father passing
12	MR. CAMPBELL: You may.	1	
13	MR. BAILUS: — and ask it	13	away. And that she was going to
1.4	be stricken.	1.4	arrange for us, from their counsel to
15	MR. CAMPBELL: And that's	15	let us know what the situation would
16	going to be the subject —	16	be. Because I think, I'm not sure was
17	MR. BAILUS: I mean this is,	17	he, I'm asking you the question, was in
18	this is clearly	18	charge of the of the monies that we
19	MR. CAMPBELL: Let me finish	μ9	were sending him. I'm not sure as to
20	and I'll let you finish, and you can	20	was it going to the wherever, I
21 .	make your	21	don't recall that portion of the
22	MR. BAILUS: Okay.	22	transaction. But I believe she
23	MR. CAMPBELL: And that's	23	mentioned that someone would be calling
24	going to be the subject of a motion	24	counsel to let us know, inform us as to
25	that's coming up. So the suggestion	25	where we would have to send the money
	[Page 58]		[Page 60]
1	that somehow we're exceeding the scope	1	thereafter that. And I don't know
		2	whether it was going to his father to
2	of discovery and that's the objection	3	take care of the, you know, the estate
3	that you're making, when that	4	or whatever.
4	involvement was withheld and covered up	1	It was very vague. And I
5	is in our view not well taken. And	5	said, well, when he calls, he can talk
6	that's my response. You can make your	6	
7	objection.	7	to my counsel and he can make the
8	MR. BAILUS: And obviously,	8	arrangements for whatever needs to be
9	I would move to strike those comments	9	done.
10	by you. And what I'm objecting to is	10	BY MR. CAMPBELL:
11	not — in the court's order dated	11	Q. All right. So she was basically
12	July 28, 2011, it says discovery is	12	putting out the word to you that there were
13	reopened for all parties to conduct	13	going to be some arrangements
14	discovery, but only as to new	14	A. Some changes.
15	allegations surrounding the alleged	15	Q made or changes made in who was
16	fraudulent transfer of 789,000 from the	16	to receive the money as a result of the buy-out
17	sale of Rick's Rizzolo's interest in	17	of the club by Rick's Cabaret?
18	the Philadelphia club to Bart Rizzolo	18	MR. BAILUS: Objection as to
19	and Kimtran Rizzolo.	19	
	So I'll have a I	20	
20		21	
21	appreciate you giving me a continuing	22	
22	objection regarding that as to any	23	
23	questions that exceed the scope of	1	that there were going to be some changes made
24	discovery. And also, I move to strike	24	
25	your comments regarding, regarding what	25	
	[Page 5	9]	[Page 61

to be calling. A. No. A. Hare you ever at the club in Las in Philadelphia with Mr. Rizzolo and your son? A. No. A. Hare you ever at the club in Las in Philadelphia with Mr. Rizzolo and your son? A. No.	outen en e
A Yes. MR. BAILUS: Objection as to form. BY MR. CAMPBELL: Q. And who was that? A Stu Cohen. P. A. Id night. And you directed Lisa Rizzolo to talk to Stu? A Not her, to counsel who was going to be calling. Q. All right. A They were communicating. Q. All right. And who was that Counsel? A I don't recall on their end, on last is send, I don't recall. Q. Okay. But nevertheless, as a corrected Lisa pattern of Lisa Rizzolo telling you that, an attorney on her behalf called? A Yes. Q. And — A I don't know if it was on her behalf. Page 621 D. Or Rick's behalf? A Yes, yes. Q. And that attorney made certain arrangements with Mr. Cohen regarding the payment of the payout amounts? A The witness: Yes. Counsel or such factors of the payout amounts? A The certain — MR. BAILUS: Objection as to form. THE WITNESS: Yes.	HERM MONINGER NOOMEN, GEHER BOOMEN, HERMEN HERMEN HERMEN ZIE ZER ZER VERWEITER HERMEN BOOM MONINGER SOOM
MR. BAILUS: Objection as to form. MR. BAILUS: Obje	ndila birandsking (111 iringan) eggelegen tubrandsking for nogeleg eggelegen bibliogsagdskingen en eggelegen
form. 6 BY MR. CAMPBELL: 7 Q. And who was that? 8 A. Stu Cohen. 9 Q. All right. And you directed Lisa 10 Rizzolo to talk to Stu? 11 A. Not her, to counsel who was going 12 to be calling. 13 Q. All right. 14 A. They were communicating. 15 Q. All right. 16 counsel? 17 A. I don't recall on their end, on 18 Lisa's end, I don't recall on their end, on 18 Lisa's end, I don't recall. 19 Q. Okay. But nevertheless, as a 20 result of Lisa Rizzolo telling you that, an 21 attorney on her behalf called? 22 A. Yes. 3 Q. And — 4 A. I don't know, he was just there, 24 A. No. 9 Q. Okay. Were you ever at the club in 1as Vegas with your son? 1 Las Vegas with your son? 1 A. No. 9 Q. Okay. Have you ever spoken to 20 Kimutra Rizzolo, the father? 1 A. No. 10 Q. Okay. Have you ever spoken to 21 A. No. 22 A. Yes. 23 Q. And — 24 A. I don't know if it was on her 25 behalf. 1 Page 621 1 Q. Or Rick's behalf? 2 A. Yes, yes. 3 Q. And that attorney made certain 4 arrangements with Mr. Cohen regarding the 5 payment of the payout amounts? 6 A. I'm certain — 7 MR. BAILUS: Objection as to 8 form. 9 THE WITNESS: Yes.	eemandering eiterboorgestrijst uiternestiistel verskert vijstelie eiterstelling bestelling bestelling en tersoo
6 BY MR. CAMPBELL: 7 Q. And who was that? 8 A. Stu Cohen. 9 Q. All right. And you directed Lisa 10 Rizzolo to talk to Stu? 11 A. Not her, to counsel who was going 12 to be calling. 13 Q. All right. 14 A. They were communicating. 15 Q. All right. And who was that 16 counsel? 17 A. I don't recall on their end, on 18 Lisa's end, I don't recall. 19 Q. Okay. But nevertheless, as a 20 result of Lisa Rizzolo telling you that, an 21 attorney on her behalf called? 22 A. Yes. 23 Q. And 24 A. I don't know if it was on her 25 behalf. [Page 62] 1 Q. Or Rick's behalf? 2 A. Yes, yes. 3 Q. And that attorney made certain 4 arrangements with Mr. Cohen regarding the payment of the payout amounts? 6 A. I'm certain 7 MR. BAILUS: Objection as to form. 9 Vegas? A. I don't know, he was just there, kind of social conversation with my son or something, you know. 10 Q. Okay. Were you ever at the club in Las 10 in Philadelphia with Mr. Rizzolo and your son? A. No. Q. Okay. Have you ever spoken to 15 Kimtran Rizzolo, the wife of Bartholomew or 16 Kimtran Rizzolo, the wife of Bartholomew or 17 Bart Rizzolo, the father? 18 A. No. Q. Have you ever spoken to any 21 attorneys acting on her behalf? A. No. 22 A. No. 23 Q. Have you had any communications with anyone from Las Vegas, Nevada, at any tin in the last year concerning the general subject 1 Page 1 matter of the gentlemen's club back here once known as the Crazy Horse Too? A. No. 4 MR. BAILUS: Objection as to form. 5 Grm. 6 BY MR. CAMPBELL: 7 Q. Is the gentlemen's club once known as the Crazy Horse Too operating under that name today?	SSS-TRY (1215 STENSA) V PYCATTY AT TORKUS PRITOTICAL PRINCETTY DOWNERS OF SHERRING MEDICAL METERS TORKUS SOCIET
Q. And who was that? R. A. Stu Cohen. Q. All right. And you directed Lisa Rizzolo to talk to Stu? Las Vegas with your son? Las Vegas with your son? Las Vegas with your son? A. No her, to counsel who was going to be calling. Q. All right. A. They were communicating. Las Vegas with your son? A. No. Q. Were you ever at the club in Las—in Philadelphia with Mr. Rizzolo and your son? A. No. Q. Okay. Have you ever spoken to Rimtran Rizzolo, the wife of Bartholomew or Rat Rizzolo, the father? A. Yes. Q. And— A. I don't recall. Q. Okay. But nevertheless, as a result of Lisa Rizzolo telling you that, an attorney on her behalf called? A. Yes. Q. And— A. I don't know if it was on her behalf. Page 621 Q. Or Rick's behalf? A. Yes, yes. Q. And that attorney made certain arrangements with Mr. Cohen regarding the payment of the payout amounts? A. I'm certain— MR. BAILUS: Objection as to form. THE WITNESS: Yes.	ędzi fortemnyczych topat whender to file of ender the ediculation endemne natural endemne endemne endemne endem
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1.5 Q. All right. And who was that 1.6 counsel? 1.7 A. I don't recall on their end, on 1.8 Lisa's end, I don't recall. 1.9 Q. Okay. But nevertheless, as a result of Lisa Rizzolo telling you that, an attorney on her behalf called? 1.0 A. I don't know if it was on her 1.1 behalf. 1.2 A. Yes. 1.2 Q. And 1.3 A. No. 1.4 A. No. 1.5 A. No. 1.6 Q. Okay. Have you ever spoken to any attorney on the paylou that, an attorney on her behalf called? 1.0 A. Yes. 1.1 don't know if it was on her 1.2 A. Yes. 1.2 A. No. 1.2 A. No. 1.2 A. No. 1.3 Q. Have you ever spoken to any attorneys acting on her behalf? 1.4 A. No. 1.5 A. No. 1.6 Q. Okay. Have you ever spoken to any attorneys acting on her behalf? 1.0 A. No. 1.0 Q. Have you had any communications with anyone from Las Vegas, Nevada, at any tim in the last year concerning the general subject in the l	CONTRACTOR DE LA PARTICIONA DE MANTE DE CONTRACTOR DE LA CONTRACTOR DE C
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19 Q. Okay. But nevertheless, as a 20 result of Lisa Rizzolo telling you that, an 21 attorney on her behalf called? 21 attorney on her behalf called? 22 A. Yes. 23 Q. And 24 A. I don't know if it was on her 25 behalf. 24 behalf. 25 IPage 62] 26 IPage 62] 27 IPage 62] 28 IPage 62] 29 IPage 62] 20 IPage 62] 21 IPage 62] 22 IPage 62] 21 IPage 62] 21 IPage 62] 22 IPage 62] 23 IPage 62] 24 IPage 62] 25 IPage 62] 25 IPage 62] 26 IPage 62] 26 IPage 62] 27 IPage 62] 29 IPag	
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6 A. I'm certain 7 MR. BAILUS: Objection as to 8 form. 9 THE WITNESS: Yes. 6 BY MR. CAMPBELL: 7 Q. Is the gentlemen's club once known 8 as the Crazy Horse Too operating under that 9 name today?	STATE
7 MR. BAILUS: Objection as to 8 form. 8 as the Crazy Horse Too operating under that 9 THE WITNESS: Yes. 9 name today?	. 8
8 form. 8 as the Crazy Horse Too operating under that 9 name today?	Caccett
9 THE WITNESS: Yes. 9 name today?	Contra
	100 m
	No.
Q. Yes. Okay. Have you had any phone 11 Q. What is the name under which it is	2000
12 calls with any attorneys acting on behalf of 12 operating?	3000
13 any of the Rizzolos? 13 A. It changed twice. It's owned still	200
14 A. No. 14 by the same company and I don't know what	ıe 🏻
15 Q. Did you ever meet Bart Rizzolo? 15 name of it is. They went from it's run as a	ıe t.
16 A. Bart is who? 16 black club now, Onyx or something of that so	t.
17 Q. Mr. Rick Rizzolo's father. 17 Q. It's run as a black club?	
10	
11. 110 144.01.	ŀ
The state of the s	,
Q. The ab one man 1-5m.	
Q. Baryon may be a series of the series of t	
[Page 63]	651

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1	A. I'm sorry, African-American.	1	later after the attorneys, our counsel
2	O. Okay. I understand. Let's talk a	2	were talking, I heard as to what
3	little bit about the current payout schedule	3	transpired and how they would arrange
4	for the club. Have you received monies this	4	to make the payments to wherever it
5	month pursuant to a payout schedule?	5	should be going to.
6	A. This month, yes. I don't know	6.	BY MR. CAMPBELL:
7	about the monies, but I signed a form that have	7	Q. Okay. Have you in the last year or
8	to clear the stock and —	8	so been contacted by any special agent of the
9	Q. Execute a put?	9	Internal Revenue Service criminal investigation
10		10	division concerning the club or Mr. Rizzolo?
11		11.	A. No.
12		12	MR. BAILUS: Objection as to
13		13	form.
14	A. Just recently I believe or, about,	14	BY MR. CAMPBELL:
15		15	Q. Or Lisa Rizzolo?
16	yeah, yes.	16	MR. BAILUS: Objection as to
	Q. All right. Have you received the — have you received the put payment for	17	form.
17		18	THE WITNESS: No.
18 19	September? A. I don't, I don't know. I hope so.	19	BY MR. CAMPBELL:
i .	Q. And you understand that as a result	20	Q. Or anyone associated with them?
20		21	A. No.
21	of the receipt of those payments, that there is	22	Q. Okay. When you heard that
22	an entitlement to distribute those payments to	23	Mr. Rizzolo was sent back to prison in part
23	the successor in interest, whatever it may	24	because of his failure to disclose these
24	-be	25	transactions involving the Crazy Horse Too in
25	A. Yes. [Page 66]	2.5	[Page 68]
<u> </u>		╁──	
1	Q for Mr. Rizzolo?	1	Philadelphia, did you seek to acquire any
2	A. Yes.	2	additional information concerning that?
3	Q. All right. Were you aware that	3	MR. BAILUS: Objection as to
4	Mr. Rizzolo was recently ordered back to	4	form.
5	prison?	5	THE WITNESS: No.
6	MR. BAILUS: Objection as to	6	BY MR. CAMPBELL:
7	form.	7	Q. Did you give a directive to any
8	THE WITNESS: I heard	8	anyone to find out what it was all about or
9	something of that sort.	9	what was going on?
10	BY MR. CAMPBELL:	10	A. I believe, because at that point, I
11	O. Who told you that?	11	thought the communication between Rick - I
12	A. I don't know where I heard it. But	12	mean not Rick Rich, my in-house counsel and
13	I know I heard it.	13	Stuart Cohen
14	Q. Were you go ahead, did you want	14	Q. Orlow, Rich Orlow?
15	to	15	A. Rich Orlow and Stu Cohen were
16	A. No, go ahead.	16	talking about where and what was happening
17	Q. Were you aware that one of the	17	there. I don't ever recall being involved in
18	primary reasons that he was sent back to prison	18	it directly, discussing what they were going to
19	was his failure to disclose transactions	19	do. But certainly made certain that they
20	involving payments that were made and received	20	followed the instructions as to what had to
		21	happen as to where the money had to go.
21	in connection with the Crazy Horse Too in	22	Q. Okay. You received a subpoena, you
22	Philadelphia?	23	
23	MR. BAILUS: Objection as to	24	A. I think I did, yes.
24	form.	25	
25	THE WITNESS: I heard that	1	Q. Right. And you understand the [Page 69]
	[Page 67	1	rage os

1	subpoena is essentially a command of a United	1	A. Right.	
2	States District Court to appear and give	2	THE VIDEO OPERATOR: Okay.	
3	testimony?	3	We're going off the record. The time	
4	A. Yes.	4	is 10:14 a.m.	
5	Q. And that's why you're here today?	5	~~~	
6	A. That's why I'm here, yes.	6	(A recess was taken at this time.)	- Warner of the
7	Q. And that subpoena called for you to	7		Vermin
8	produce documents?	8	(Subpoena marked Exhibit Piazza 1	AKK
9	A. I don't know.	9	for identification.)	A STATE OF THE PARTY OF THE PAR
10	Q. You don't know?	10		A Comment
11		11	THE VIDEO OPERATOR: Okay.	T. C. Park
12	Q. Okay. So you had you did not	12	This begins tape two in the deposition	2
13		13	of Vincent Piazza. We are going on the	SENSON S
14		14	record at 10:31 a.m. Please continue.	San San
15	A. No.	15	BY MR. CAMPBELL:	STANCE.
16		16	Q. Mr. Piazza, I'm going to show you	AKD39
17		17	what has been marked as Exhibit No. 1 in these	357.790
18	1,114 2,000 1 1 2 1 7 1 1 1 1	18	proceedings, your deposition. They put this	DC. NO.
19	MR. CAMPBELL: No. We'll	19	little tab on here and we call it by a number,	S. S. S. S.
20	get to it in a second. We'll get to it	20	so we know exactly what documents that have	XXXXX
21	in a second.	21	been marked in any particular deposition. This	Sympton
22	BY MR. CAMPBELL:	22	particular one is the subpoena that was served	Second
23	Q. With respect to Mr. Orlow	23	upon you. Would you examine that just for a	Cassara
24	A. Yes.	24	moment. Do you recall that?	XXXXX
25	Q have you had any discussions	25	A. I know it was served, but I	0000077
23	[Page 70]	Γ	[Page 72]	en es
			·	Nation 1
1	with Mr. Orlow concerning the fact that	1	didn't I don't recall it.	SW/KS
2	Mr. Rizzolo went back to prison in part because	2	Q. Okay. And after you received that	No.
3	of his failure to disclose or otherwise be	3	subpoena, you gave it to Mr. Orlow; is that	Salasia
4	forthcoming concerning his involvement and	4	correct?	850000
5	entitlement to payments from the Crazy Horse	5	A. Yes.	Konse
6	Too?	6	Q. Okay. And you'll notice on the	S. S. S. S.
7	MR. BAILUS: Objection as to	7	back, just for purposes of identification here,	Sale Park
8	form.	8	that there's an exhibit that required	STORY OF
9	THE WITNESS: No.	9	A. I'm sorry.	CT (OTHER
10	BY MR. CAMPBELL:	10	Q. That's okay.	. 13
11	Q. Do you know whether or not Mr.	11	A. Let me turn it off.	20,454
12	Orlow has had any conversations with anyone on	12	Q. That's all right. And you'll	100
13	behalf of Rick and/or Lisa Rizzolo or anyone	13	notice that there was an exhibit attached	
14	associated with them?	14	requiring you to produce five categories of	
15	MR. BAILUS: Objection as to	15	documents. Do you see that?	
16	form.	16	A. Yes.	
17	THE WITNESS: Not to my	17	Q. Okay. And as a result of your	l
18	knowledge.	18	service of this subpoena, you just turned this	
19	BY MR. CAMPBELL:	19	matter over to Mr. Orlow; is that correct?	
20	Q. Okay. Why don't we take a quick	20	A. Yes.	İ
21	break, give you an opportunity to stretch your	21	O. And Mr. Orlow is the individual	
22	legs.	22	that you assigned the responsibility of	
23	A. Sure.	23	complying with whatever legal obligations were	
24	Q. And have a drink of water or use	24	attendant to this subpoena?	
25	the restroom. Okay?	25	A. That's correct.	
دع	[Page 71	ì	[Page 73]	1
- 1	Irage /r	4	The American Company of the Am	

1	Q. Is that correct?	1	you. Do you know anyone by the name Dominic
2	A. Yes.	2	Gentile?
3	Q. And Mr. Orlow is your in-house	3	A. No.
4	controller and attorney, as I understand it?	4	Q. Accordingly, you don't know that
5	A. Yes.	5	you've ever spoken to Dominic Gentile; is that
6	Q. Is that correct?	6	correct?
7	A. That's correct.	7	A. No.
8	Q. All right. And by controller, I	8	Q. Okay. Has Mr. Orlow told you that
9	mean he's in charge of the	9	he has recently been contacted by attorneys
10	A. Yes.	10	representing Mr. Rizzolo and/or Mrs. Rizzolo?
11	Q the accounting operations as	11	A. He might have. I'm not sure.
12		12	Q. Okay. As I understand it, the
13		13	payments that are made by Rick's Cabaret are
14		14	made to you?
15		15	A. Yes.
16		16	Q. You in turn then instruct your
17	Working with other attorneys in Joan contain,	17	accounting department to distribute the funds
18	A. Correct.	18	pursuant to whatever agreements?
19	Q. But you don't know what the	19	A. Correct.
20	documents are?	20	O. Okay. And we talked a little bit
	A. No.	21	about the fact that Lisa Rizzolo called
21		22	concerning changing the distribution from one
22	Q. You haven't looked at any of those	23	person to another, do you recall?
23	documents?	24	A. That's correct.
24	A. None.	25	MR. BAILUS: Objection as to
25	Q. You've relied upon your attorneys [Page 74]	23	Page 76]
		+	
1	to do that on your behalf?	1	form.
2	A. Yes.	2	BY MR. CAMPBELL:
3	O. Is that correct?	3	Q. And we also talked about the fact
4	A. That's correct.	4	that at some point, these distributions were
5	MR. CAMPBELL: Okay. Mr.	5	being made to Kimtran Rizzolo, Mr. Bart
6	Brennan, yesterday you produced some	6	Rizzolo's widow?
7	categories of documents with your	7	A. I'm not sure.
'	partner, Mr. Cohen. They were marked	8	O. All right. You're aware that your
8		9	accounting department distributed about
9	separately with some stickers. There	10	\$120,000 in error; is that correct?
10	were very few documents that were	11	A. That's correct.
11	marked. Is that the total documents	1	O. How did it come to your attention
12	that would be in compliance with this	12	A. That's correct. Q. How did it come to your attention that this was an error?
13	subpoena?	13	ujai iiis was an citut:
14	MR. BRENNAN: To the best of	14	A. Mr. Rizzolo I mean, I'm sorry,
15	my knowledge, yes.	15	Orlow mentioned it to me.
16	MR. CAMPBELL: All right.	16	Q. Okay. And what did he tell you?
17	If we need to talk to you further about	17	A. That there was a mistake made and
18	that, can we do that?	18	they were going to try to correct it to see
19	MR. BRENNAN: I would be	19	that the, you know, the payments were going in
20	happy to cooperate.	20	a — where they should be going.
21	MR. CAMPBELL: And with Mr.	21	Q. Right. That \$120,000 representing
22	Orlow as well.	22	four payments of \$30,000 were incorrectly sent
23	MR. BRENNAN: Yes.	23	
24	BY MR. CAMPBELL:	24	in interest of Lions Limited, Rick Rizzolo's
25	Q. I just have a few more questions of	25	- •
	[Page 75	1	[Page 77]

	<u></u>		
1	A. Yes * 1	1	A. No, I did not.
2	 Q. And you wanted to make a point in 	2	Q. All right.
3	this deposition, as I understand it, that that	3	A. I just mentioned to him to try to
4	was a mistake, it wasn't part of any fraud that	4	do what they had to do, which was right for
5	you were involved in with Lisa Rizzolo or	5	whatever needed to be with the court.
6	Kimtran Rizzolo or Mr. Rizzolo?	6	Q. Okay. And do you know, are there
7	MR. BAILUS: Objection as to	7	any withdraw. You have likewise been
8	form.	8	informed by your counsel that those funds have
9	THE WITNESS: None	9	not yet been returned, the 120,000 has not
0	whatsoever.	10	been
1	BY MR. CAMPBELL:	11	A. I'm not sure.
2	O. Okay. Just as you say, an honest	12	O returned? You don't know
3	mistake?	13	whether it has?
	A. That's correct.	14	A. I don't know.
4	Q. Okay. And your attorney and	15	Q. Okay. If they have not been
.5		16	returned, do you, presumably, you're going to
.6	controller, Mr. Orlow, told you about that that	17	continue your efforts to recover those funds
.7	it was an honest mistake?	18	for the mistake that was made by your firm,
8	A. Yes.	19	correct?
.9	Q. And that they were making an effort	i	
20	to get those monies back, because	20	A. We'll do everything we can to help
21	A. Yes.	21	in that matter, certainly.
22	 Q your company had made that 	22	Q. All right, sir. Have you ever lent
23	mistake?	23	Mr. Rizzolo any money?
24	A. Yes.	24	A. No.
25	Q. Okay. What efforts have been	25	Q. Mr. Rizzolo has never lent you any [Page 80]
	[Page 78]	-	frage out
1	engaged in to get those monies back from	1	money, has he?
2	Kimtran Rizzolo in the amount of \$120,000?	2	A. No.
3	A. I don't, I really don't know.	3	Q. Did you ever have any other
4	Q. Okay. And have you inquired about	4	business dealings with Mr. Rizzolo of any kind
5	that?	5	or type other than your business dealings with
6	A. I wanted, I wanted to make certain	6	him in connection with the Crazy Horse Too
7	that they did something and tried to get that	7	night gentlemen's club in Philadelphia?
		8	A. No.
8	money back.	9	Q. What does TEZ stand for?
9	Q. Okay.	10	A. It's a corporation I think that was
10	A. Certainly I was doing that with	11	involved with the club, I'm not sure.
11	that I mean with Rich.	12	O. Do you know someone by the name of
12	Q. So what did they do?	ł	<u> </u>
13	A. I don't know up until this point	13	Coscia?
14	what has been done. I don't know whether they	14	A. Coscia?
15	have been discussing it with Stu Cohen as to	15	Q. Salvatore?
16	what procedures or whatever process they have	16	A. Salvatore Coscia, no.
17	to take in order to get it. I'm not sure.	17	Q. Were you aware that the Crazy Horse
18	Q. Have they instituted any legal	18	Too nightclub in Las Vegas, Nevada was raided
19	action back here in Philadelphia to try to	19	on two occasions by the FBI?
20	impose, for example, a constructive trust on	20	MR. BAILUS: Objection as to
21	Kimtran Rizzolo or to seek restitution or	21	form.
22	return of those funds?	22	THE WITNESS: I don't
23	A. That I don't know.	23	recall. I don't think so. I wasn't
24	Q. Okay. Have you discussed that with	24	aware.
		25	
25	your attorneys back here?		

1 BYMR CAMPBELL: 2 Q. Okey. When was the last time that 3 Rick Rizzolo was here in Pfilladelphia that you saw him? 5 A. Gosh, I don't have the exact date. 6 Q. Ballpark it. 7 A. Right after we were getting ready to sell; it. He was telling me he had to send his people back. It. He was telling me he had to send his people back to Las Vegas? 12 A. Las Vegas. 13 Q. Okay. And had to send his people back to Las Vegas? 14 A. Las Vegas. 15 Q. Okay. I saked you whether or not you had ever communicated with Rick Rizzolo to while he was in prison. Let me—and you said no, do you recall that? 16 A. That's correct. 17 A. That's correct. 18 Q. The going to, because I'm an anal retentive guy and detail oriented, I'm going to ask you a slightly different question and it's not meant to harnas you in any way. Have you ever spoken to him while he has ever been incarcerated at any time? 19 A. I don't think so. 20 Q. Has he ever called you during a [Paga 82] 1 period of time in which he was incarcerated, whether it was in prison or a halfway house or a a jail? 2 period of time in which he was incarcerated, whether it was in prison or a halfway house or a a jail? 2 period of time in which he was incarcerated, whether it was in prison or a halfway house or a jail? 2 period of time in which he was incarcerated, whether it was in prison or a halfway house or a jail? 3 Q. Okay. When did he call? 4 A. Or on parole. 5 MR. BAILUS: Objection as to form. 7 BYMR. CAMPBELL: 8 Q. Or on parole. 9 A. Yeah, it is in dea. 19 period of time in which he was acking me how 1 rath that therim. 19 Q. And what did you talk to him about? 10 A. I don't recall the date, but I know 1 rath was the prison of a halfway house or a sightly did the date, but I know 1 rath was the prison of a halfway house or a sightly did to this in the interim. 19 Q. And what did you talk to him about? 10 A. Jon't recall the date, but I know 1 rath was the listed Mike and he wanted to know how he was doing. That was about it. 19 Q. Sometime after he got out of prison for the firs			T	
Rick Rizzolo was here in Philadelphia that you as whim? A. Gosh, I don't have the exact date. Q. Ballpark it. A. Right after we were getting ready to sell it. He was telling me he had to send his people back. Q. Okay. And he had to send his people back to Las Vegas. Q. Okay. I asked you whether or not you had ever communicated with Rick Rizzolo to while he was in prison. Let me—and you said no, do you recall that? A. That's correct. Q. Okay. To maked you whether or not you had ever communicated with Rick Rizzolo to while he was in prison. Let me—and you said no, do you recall that? A. That's correct. Q. Okay. You answered your cell phone? A. Yes. Q. Hes yid one. Q. Okay. You answered your cell phone? A. Yes. Q. Hes said— A. Yes. Q. Hes aid— A. Yes. Q. Hes, Vince, it's Rick Rizzolo? A. Yesh. Q. Okay. And how long was that telephone conversation? Q. What's your cell phone number? A. Idon't think so. Q. Has he ever called you during a [Page 821] period of time in which he was incarcerated, whether it was in prison or a halfway house or a jail!? A. Or on parole? MR. BAILUS: Objection as to form. BYMR. CAMPBELL: Q. Or on parole. A. I don't recall the date, but I know that Rick Rizzolo's telephone number is? A. That was in prison that hat interim. Q. And what did you talk to him about? A. Yeah, he called me once. Q. Okay. You answered your cell phone? A. Yes. Q. Hes, Vince, it's Rick Rizzolo? A. Yesh. Q. Okay. And how long was that telephone conversation? A. Yesh. Q. Okay. And how long was that telephone conversation? A. Yesh. Q. Okay. And how long was that telephone conversation? A. Yesh. Q. Okay. And how long was that telephone conversation? A. Yesh. Q. Okay. And how long was that telephone conversation? A. Yesh. Q. Okay. And how long was that telephone conversation? A. I wasn't very long. Q. Okay. And how long was that telephone conversation? A. Yesh. Call phone. A. Yesh. Call phone. A. Yesh. Call phone. A. Yesh. A. Gall phone. A. Yesh. Call phone. A. Yesh. Call phone. A. Yesh. Call phone. A. Yesh. Call phone. A	1	BY MR. CAMPBELL:	1	- I4
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5 A. Gosh, I don't have the exact date. 6 Q. Ballpark it. 7 A. Right after we were getting ready 8 to sell it. He was telling me he had to send 9 his people back. 10 Q. Okay. And he had to send his 11 people back to Las Vegas? 12 A. Las Vegas. 13 Q. Okay. I asked you whether or not 14 you had ever communicated with Rick Rizzolo 15 while he was in prison. Let me—and you said 16 no, do you recall that? 17 A. That's correct. 18 Q. I'm going to, because I'm an anal 19 retentive guy and detail oriented, I'm going to 10 ask you a slightly different question and it's 10 not meant to harass you in any way. Have you 22 ever spoken to him while he has ever been 24 A. I don't think so. 25 Q. Has he ever called you during a 18 period of time in which he was incarcerated, 2 whether it was in prison or a halfway house or 2 a jaiil? 2 period of time in which he was incarcerated, 3 whether it was in prison or a halfway house or 2 a jaiil? 3 Q. Or on parole. 4 A. Or on parole. 5 MR. BAILUS: Objection as to 6 form. 7 BYMR. CAMPBELL: 8 Q. Or on parole. 9 A. Yeah, he called me once. 10 Q. Okay. When did he call? 11 A. I don't recall the date, but I know 12 I talked to him in that interim. 13 Q. And what did you talk to him about? 14 A. Not very much, he was asking me how 15 I was doing, the family and all that. For what 16 reason, I don't know, but he liked Mike and he 17 wanted to know how he was doing. That was 18 about it. 19 Q. When was that? 20 A. I don't recall, that was— 21 Q. Sometime after he got out of prison 22 for the first time? 23 A. Yeal, if think he called my 24 d. A. Yes. 25 Q. Okay. You answered your cell phone? 26 A. Yes. 27 A. Yes. 28 A. Yes. 29 A. Yes. 20 Chapt. I think he called my 20 Clokay. You answered your cell 21 period of time in which he was incarcerated, 22 whether it was in prison or a halfway house or 23 a jail? 24 Period of time in which he was incarcerated, 25 Whether it was in prison or a halfway house or 26 of the first time? 27 A. I don't recall, that was— 28 A. Cell phone, I think he called m	3		1	
6 Q. Presumably, he called your secretary— 7 A. Right after we were getting ready to sell it. He was telling me he had to send his people back. 10 Q. Okay. And he had to send his 1 people back to Las Vegas? 11 A. Las Vegas. 12 A. Las Vegas. 13 Q. Okay. I asked you whether or not 14 you had ever communicated with Rick Rizzolo 15 while he was in prison. Let me—and you said 16 no, do you recall that? 17 A. That's correct. 18 Q. I'm going to, because I'm an anal 16 retentive guy and detail oriented, I'm going to ask you a slightly different question and it's 17 not meant to harass you in any way. Have you 2 ever spoken to him while he has ever been 16 incarcerated at any time? 18 A. I don't think so. 20 Has he ever called you during a [Page 82] 1 period of time in which he was incarcerated, 2 whether it was in prison or a halfway house or 3 i jail? 4 A. Or on parole. 5 MR. BAILUS: Objection as to 6 form. 7 BYMR. CAMPBELL: 8 Q. Or on parole. 9 A. Yeah, he called me once. 10 Q. Okay. When did he call? 1 A. I don't reall the date, but I know 12 I talked to him in that interim. 12 I talked to him in that interim. 13 Q. And what did you talk to him about? 14 A. Not very much, he was asking me how 15 I was doing, the family and all that. For what reason, I don't know, but he liked Mike and he wanted to know how he was doing. That was about it. 19 Q. When was that? 20 A. I don't recall, that was — 21 Q. When was that? 21 Q. When was that? 22 A. Yeah, It move the liked Mike and he wanted to know how he was doing. That was about it. 19 Q. When was that? 20 A. I don't recall, that was — 21 Q. When was that? 21 C. When was that? 22 A. Yeah, I think so, yes. 23 A. Yeah, I think so, yes. 24 Q. All right. And when he called you, was that the phone and I hung up. I swear. (702)376-6913. 25 BYMR. CAMPBELL: 26 Q. All right. And when he called you, was that the phone and I hung up. I swear. (702)376-6913.	4		1	-
A Right after we were getting ready s to sell it. He was telling me he had to send his people back. O Q. Okay. And he had to send his people back to Las Vegas? 2 A. Las Vegas. A Yea. Q Okay. I asked you whether or not you had ever communicated with Rick Rizzolo while he was in prison. Let me – and you said no, do you recall that? A That's correct. Q O I'm going to, because I'm an anal retentive guy and detail oriented, I'm going to ask you a slightly different question and it's not meant to harass you in any way. Have you ever spoken to him while he has ever been incarcerated at any time? A I don't think so. Q Oray. When sy to reliphone, I think he called my Q Okay. You answered your cell hone. Q Okay. You answered your cell hone. Q Hes aid— A Yes. He said— A Yes. He said— A Yesh He your cell phone? A Yesh He you had ever correct. A Yesh He you had ever communicated with Rick Rizzolo? A Yesh He you had ever communicated with Rick Rizzolo? A Yesh He you had ever correct. A Yesh He your cell phone. A Yesh He you had ever correct. A Yesh He you had ever correct. A Yesh He you had ever called my out and it's A Just — Q Okay. You answered your cell phone none. Q Okay. When was that D Okay. When was incarcerated, A Yesh He your cell phone. Q Doy Okay. You answered your cell A Yesh He your cell phone. Q Okay. You had ever conversation? A It wasn't very long. Q Whaf's your cell phone number? A Zi — I don't trink iso. A Yesh He your cell phone. D Okay. When was that it leephone conversation? A Yesh He your cell phone. A Yesh He your cell phone. D Oy Okay. Ha ske de'ver	5	•	1	IS IN THE PROPERTY OF THE PROP
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		[Page 83	3]	[Page 85]

1	Q. 6913?	1	BY MR. BAILUS:
2	A. Yes.	2	Q. And I just really only have one
3	Q. Do you have his nephew's number in	3	question, Mr. Piazza.
4	there?	4	A. Yes.
5	A. No, that's the only number I have.	5	Q. Earlier in your testimony you
6	Q. Do you have Lisa's number in there?	6	mentioned your son in reference that Tommy
7	A. No. I should have deleted it.	7	Lasorda and the Dodgers, and the son you were
8	Q. Do you have any other numbers for	8	mentioning was Mike Piazza, the all star
9 .	Mr. Rizzolo?	9.	catcher?
10	11. 210.	10.	A. Yes.
11	Q. 11470 Jou 0701 00011 001111111111111	11	MR. BAILUS: Okay. Thank
12	Officer of the Department of Larent and	12	you. That's it.
13	Tropation who was supervising that remain	13	MR. CAMPBELL: That's it.
14	ne was on resease.	14	THE VIDEO OPERATOR: Okay.
15	23. 140.	15	This now concludes the deposition of
1.6	Q. 1110 10 tax man. 200 m.	16	Vincent Piazza. We are going off the
17	specifically responsible for making the	17	record at 10:52 a.m.
18	distributions? When I say physically	18	
19	responsible, I mean responsible for cutting the	19	(Whereupon, the deposition was
20	checks and getting them signed and mailing them	20	concluded at 10:52 a.m.)
21	out?	21	
22	A. Rich, Rich.	22	•
23	Q. That's Rich?	23	
24	A. Yes.	24.	•
25	Q. Rich Orlow? [Page 86]	25	[Page 88]
	[rage bo]	 	
1	A. Right.	1	CERTIFICATION
2	MR. CAMPBELL: Okay.	2	'
3	Mr. Piazza, thank you for come hearing	3	·
4	today and answering my questions. I'm	4	I HEREBY CERTIFY that the proceedings
5	very appreciative. Mr. Bailus or your	5	and evidence are contained fully and accurately
6	own counsel may have some questions, I	6	in the stenographic notes taken by me upon the
7	don't know.	7	foregoing matter on September 28, 2011, and
8	MR. BAILUS: Could we just	8	that this is a correct transcript of same.
9	take a five-minute break	9	
10	MR. CAMPBELL: Sure.	10	
11	MR. BAILUS: - and then see	11	•
12	if I have any questions. Just take a	12 13	
13	five-minute break.	14	
14	THE VIDEO OPERATOR: Going	15	Robin L. Clark
15	off the record. The time is 10:47 a.m.		Registered Professional Reporter
16		16	TOPONOTOR TOPONOMIC TAPATAL
17	(A recess was taken at this time.)	17	·
18		18	
19	THE VIDEO OPERATOR: Okay.	19	
20	We're back on the record. The time is	20	
21	10:52 a.m.	21	(The foregoing certification of this
22		22	transcript does not apply to any reproduction
23	CROSS-EXAMINATION	23	of the same by any means unless under the
24	~~~~	24	•
		25	certifying reporter.)
25	•	2.5	[Page 89

1	INSTRUCTIONS TO WITNESS	1 2	2
2	Please read your deposition over	3	
4	carefully and make any necessary corrections.	4	certify that I have read the foregoing pages
5	You should state the reason in the appropriate		and that the same is a correct
6	space on the errata sheet for any corrections	5	transcription of the answers given by me to
7	that are made.	6	
8	After doing so, please sign the errata sheet and date it.	7	1
9 LO	You are signing same subject to the	8	the corrections or changes in form or
11	changes you have noted on the errata sheet,	وا	substance, if any, noted in the attached
12	which will be attached to your deposition.		Errata Sheet.
13	It is imperative that you return the	11	
14	original errata sheet to the deposing attorney	1.2	2
15	with thirty (30) days of receipt of the	1.3	Subscribed and sworn to before me this
16	deposition transcript by you. If you fail to		day of ,
17	do so, the deposition transcript may be deemed	14	2011.
18	to be accurate and may be used in court.	15	
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