

1 RICK RIZZOLO
2 1760 Amarone Way
3 Henderson, NV 89012
4 Defendant

5 UNITED STATES DISTRICT COURT
6 DISTRICT OF NEVADA

7 KIRK and AMY HENRY,
8 Plaintiffs,

CASE NO.: 2:08-CV-635-PMP-GWF

9 vs.
10

11 FREDRICK RIZZOLO aka
12 RICK RIZZOLO, an individual;
13 LISA RIZZOLO, an individual;
14 THE RICK AND LISA RIZZOLO
15 FAMILY TRUST,
16 Defendants.

17 DEFENDANT RICK RIZZOLO'S SUPPLEMENTAL ANSWERS TO PLAINTIFF'S
18 FIRST SET OF INTERROGATORIES AND SUPPLEMENTAL PRODUCTION OF
19 DOCUMENTS
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- No. 3 Misc Jewelry and Clothes that I currently possess. And there is nothing that I possess that I don't own.
- No. 4 I do not have any present interest in any real property. Past property see Divorce Decree and see Government Seizure.
- No. 5 I do not own any vehicles, firearms, collections of any kind except some sports memorabilia misc maybe worth 10-15 thousand, no tools or equipment. Government seized most of sports memorabilia.
- No. 6. I have no interest in any business other than the seized Power Company, Inc. Crazy Horse Too and seized Rickiz, LLC. which owned the shopping center where Crazy Horse Too is located. Directors and stockholders are Rick Rizzolo and Kauter.
- No. 7. I am a stock holder in Power Company, Inc. which the government seized and a manager of Rickiz LLC, which the government seized. A manager of Lions Limited which owns a 2005 SL 65 Mercedes today market value about 50-60 thousand.
- No. 8. I do not have any accounts that are still open that I have control over. I have an IRA Primerica # [REDACTED] balance as of March 31 2009 \$61,714.91

No. 10. I Have no safe or Safe Deposit Boxes that I Have control over, There was safes on the Premises at The Crazy Horse too But I No Longer have access to.

No. 11. I Have a claim against Mike Signorilli just trying to get a judgement ~~now~~ which I will assign to you. For Damages at Crazy Horse too, Back Rent, cash, Inventory and Bonds. And attorney Fees.

No. 12. I believe there was a Family Trust when I was still married but was never funded John Dawson attorney was the creator. I also was a Trustee for Bart Rizzolo years ago but am no longer you can't be a felon and manage a Trust.

No. 13. I Don't believe I am an heir to any other persons will, But Not sure

No. 14. I Have An IRA. Primerica # [REDACTED]
Balance as of March 31, 2009 61,714.91

No. 15. Exhibit "A" attached here to and Misc. Guns to Ex wife for 50,000


No. 19. No I Have NOT Been a party, To
Purchase any of my assets.

No. 20 I send a report To my probation officer
Every Month That all the Books I keep.
ERIC CHRISTIANSON.

No. 22. Metropolitan Retention Center P.O Box 1500
Los Angeles Ca. 90053. And Three weeks at
a half way House In Las Vegas on Industrial Rd.
Behind Circus Circus. John The Director was
my supervisor.

No. 23. Bart Rizzolo my Father handled most
of everything for me.

Request 7
See Divorce Decree Don't Have anything
else.

Request 12. IRA. Primerica #  Balance of \$
of March 31, 2009 61,714.91

Request 15. See Security Pacific Bank
And there was a loan prior to Security Pac. I.

with Nevada Commerce which security vacated
payed off. Government has Loan Applications

1-2008	23. Bof America. # [REDACTED]	closed	STATEMENTS ORDERED
	Nevada State # [REDACTED]	closed.	
	Nevada State # [REDACTED]	closed	
	[REDACTED]	[REDACTED]	

Request No 28. Law suit against Mike Signarelli

4-20-09

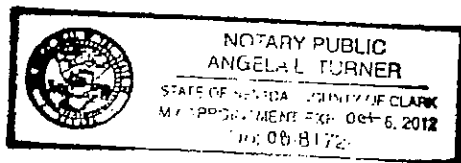
State of Nevada

County of Clark

On April 20th, 2009, Rick Pizzullo, personally appeared before me,

who is personally known to me to be the signer of the above instrument, and he acknowledged that he signed it.

Notary Public



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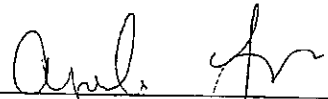
CERTIFICATE OF MAILING

Pursuant to Fed.R.Civ.P.5(b), I certify that I am an employee of PATTI, SGRO & LEWIS and on the 20th day of April, 2008, service of a true and correct copy of the foregoing **DEFENDANT RICK RIZZOLO'S SUPPLEMENTAL ANSWERS TO PLAINTIFF'S FIRST SET OF INTERROGATORIES AND SUPPLEMENTAL PRODUCTION OF DOCUMENTS** was made by depositing a copy of the same in a sealed envelope, first class postage prepaid addressed as follows:

DONALD J. CAMPBELL, ESQ.
J. COLBY WILLIAMS, ESQ.
CAMPBELL & WILLIAMS
700 So. Seventh Street
Las Vegas, NV 89101
Attorneys for Plaintiff KIRK HENRY

C. STANLEY HUNTERTON, ESQ.
HUNTERTON & ASSOCIATES
333 South Sixth Street
Las Vegas, NV 89101
Attorneys for Plaintiff AMY HENRY

MARK B. BAILUS, ESQ.
BAILUS, COOK & KELESIS, LTD.
400 So. Fourth St., Suite 300
Las Vegas, NV 89101
Attorneys for Defendant/Cross-Claimant LISA RIZZOLO


An employee of Patti, Sgro & Lewis

1 LAW OFFICES OF KENNETH G. FRIZZELL, III
 2 KENNETH G. FRIZZELL, III, ESQ.
 Nevada Bar No.: 006303
 509 South Sixth Street
 3 Las Vegas, Nevada 89101
 Telephone: (702) 366-1230
 4 Facsimile: (702) 384-9961
 Attorney for Defendants
 5 FREDRICK J. RIZZOLO
 RICK AND LISA RIZZOLO FAMILY TRUST
 6 RICK J. RIZZOLO SEPARATE PROPERTY TRUST and RJR TRUST

7 UNITED STATES DISTRICT COURT

8 DISTRICT OF NEVADA

9 * * *

10 KIRK and AMY HENRY,
 11 Plaintiffs,

12 vs.

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

19 Defendants.

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

DEFENDANT FREDRICK
 RIZZOLO'S THIRD
 SUPPLEMENTAL ANSWERS TO
 FIRST SET OF INTERROGATORIES

20 COMES NOW, Defendant FREDRICK RIZZOLO, by and through his Counsel of
 21 Record, KENNETH G. FRIZZELL, III, ESQ., and answers the Plaintiffs' Interrogatories as
 22 follows:

23 INTERROGATORY NO. 1:

24 State the full name and present address of each person with whom you have
 25 engaged in any partnership, business enterprise or business venture since September 20,
 26 2001.

27 ANSWER: No supplement.

28

1 INTERROGATORY NO. 2: State the date, place and name of each person or
2 institution to whom you have furnished or exhibited any statement of your financial
3 condition since September 20, 2001.

4 ANSWER: No supplement. The Federal Court has provided appropriate copies
5 of information provided to the United States Government through the United States
6 Probation Department under document #248.

7 INTERROGATORY NO. 3: State the full description and present location and
8 ownership of any asset or property you presently possess. If any such asset or property is
9 not presently owned by you, state the full details concerning its disposition by you,
10 including to whom it went, when, and for what consideration, including its sale price, if
11 any.

12 ANSWER: The Federal Court has provided appropriate copies of information
13 provided to the United States Government through the United States Probation
14 Department under document #248.

15 Personal: Clothing and personal possessions. The personal cash which I have
16 been living on came from the sale of jewelry to family members and the sale of my 1955
17 Corvette in August 2008.

18 Bank/Financial Accounts: Nevada Commerce Bank, Account #: [REDACTED] or
19 Lions Limited Partnership, balance \$280.00; Nevada State Bank, Account #: [REDACTED]
20 closed; Nevada State Bank, Account #: [REDACTED] closed; Bank of America, Account #:
21 [REDACTED] closed; Oppenheimer, Account #: [REDACTED] balance \$0.63.

22 Real Estate: None.

23 Vehicles: 2005 Mercedes SL 55, registered to Lions Limited Partnership, current
24 value unknown; 1955 Corvette which was sold August 2008.

25 Life Insurance: No personal ownership. John Hancock policy has a value of
26 \$259,680.93 and was awarded to ex-spouse in the divorce. Additional lien against policy
27 by divorce judgment as collateral against judgment obligations. Dominick Rizzolo is Trustee
28 for Lisa Rizzolo.

1 Retirement Investment/SEP/IRA: Energy Transfer Partners LP, Account #: [REDACTED]
2 [REDACTED] held as SEP Investment, balance \$10,334.00; PrimeAmerica IRA, Account #:
3 [REDACTED] balance \$61,714.91.

4 Contingent Assests: Lawsuit against Michael Signorelli; Sale of the Crazy
5 Horse, dependent on protection of the name and the previous FDIC sale of the underlying
6 loan.

7 Debts: Average monthly household expenses, average monthly medical
8 expenses; American Express XXXX [REDACTED] monthly payment; Mastercard/Visa XXXX [REDACTED]
9 monthly payment.

10 INTERROGATORY NO. 4: State the location and estimated present market value of
11 any and all ownership or leasehold interest in any real property you presently have or have
12 held since September 20, 2001, to the present date.

13 ANSWER: No Supplement. As for the residential information in connection with
14 Mr. Diamond, this information was provided to the United States Probation Department
15 and has been released in redacted form by the Court in document #248.

16 INTERROGATORY NO. 5: State the cost, location and estimated present market
17 value of each item of personal property owned by you, including but not limited to vehicles
18 of any sort, firearms, collections (stamps, coin, sports memorabilia, etc.), tools, and
19 equipment of any sort as of September 20, 2001, to the present date.

20 ANSWER: No supplement. This interrogatory has been asked, answered and
21 supplemented. Any remaining sports memorabilia was and is located in the warehouses
22 and was subject to seizure with the remainder of the Crazy Horse complex.

23 INTERROGATORY NO. 6: List any business you have an ownership in, including the
24 name of the entity, its location, all other officers, and contact information.

25 ANSWER: No supplement.

26 INTERROGATORY NO. 7: List any stocks, bonds, or other securities or any class in
27 any government, governmental organization, company, firm or corporation, whether
28 foreign or domestic that you own.

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ANSWER: See supplement to Answer #3 above.

INTERROGATORY NO. 8: List any and all financial institution accounts you currently maintain, whether business or personal, checking or savings, or jointly owned, or to which you hold in trust for anyone else.

ANSWER: See supplement to Answer #3 above.

INTERROGATORY NO. 9: List and give full details concerning any account not listed above, held in any name other than your own, or over which you have dominion, possession, or control.

ANSWER: See supplement to Answer #3 above.

INTERROGATORY NO. 10: List any safe deposit box or other depository for securities, cash or other valuables that you maintain and its location since September 20, 2001, to the present date.

ANSWER: No supplement.

INTERROGATORY NO. 11: List any causes of action you presently have, or identify any claims for money you have against any others and the circumstances giving rise to the claim.

ANSWER: See supplement to Answer #3 above. The action against Mr. Signorelli is a matter of public record and may be obtained online..

INTERROGATORY NO. 12: List any property you hold or have held as trustee or a testamentary or inter vivos trust since September 20, 2001, and identify any trust you have created or contributed to for the benefit of others since September 20, 2001.

ANSWER: No supplement.

INTERROGATORY NO. 13: State whether you are an heir-at-law or beneficiary under the terms of the will of any person and list the terms of your entitlement under such will.

ANSWER: No supplement.

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1 INTERROGATORY NO. 14: List any interest you have in any pension plan, retirement
2 fund, profit-sharing plan, or life insurance policy payable to you, your estate, your former
3 wife, her estate, or any other entity.

4 ANSWER: See supplement to Answer #3 above.

5 INTERROGATORY NO. 15: State if you have at any time since September 20, 2001,
6 conveyed or disposed of any property either by sale, gift, court order or otherwise, for
7 which such property has been conveyed or transferred and is now being held for you in
8 the name of some person other than yourself and describe the terms thereof.

9 ANSWER: See supplement to Answer #3 above. Refer to divorce order for
10 distribution of community property.

11 INTERROGATORY NO. 16: List any conveyances, transfers, gifts or other disposition
12 of property since September 20, 2001, with any reservation of rights, benefits, or options
13 running to you for the reacquisition of the property at some future date.

14 ANSWER: See supplement to Answer #3 above. Redundant to Interrogatory #15.

15 INTERROGATORY NO. 17: Identify if you have, at any time since September 20,
16 2001, entered into any transaction with your former spouse or any other relative involving
17 the transfer, conveyance, assignment or other disposition of any of your real or personal
18 property and describe the terms thereof.

19 ANSWER: See supplement to Answer #3 above. Redundant to Interrogatory #15.

20 INTERROGATORY NO. 18: State whether you have, at any time since September
21 20, 2001, been a party to any contract or any other agreement, whereby you granted an
22 option to anyone to purchase any or all of your assets and describe the terms of the
23 contract.

24 ANSWER: No supplement.

25 INTERROGATORY NO. 19: List any creditors you have at the present time and the
26 amount and terms of the debt along with any property which you claim is exempt from
27 collection by Plaintiff or any other creditors.

28 ANSWER: See supplement to Answer #3 above. In connection with Lisa Rizzolo,

1 no supplement, as that information has already been disclosed.

2 INTERROGATORY NO. 20: Identify any books or other written memoranda you
3 keep of your income and business affairs.

4 ANSWER: No supplement. The Federal Court has provided appropriate copies
5 of information provided to the United States Government through the United States
6 Probation Department under document #248.

7 INTERROGATORY NO. 21: Identify any certified public accountant or any other
8 individual you have employed for financial services, or had employed in your behalf, at any
9 time since September 20, 2001.

10 ANSWER: No supplement.

11 INTERROGATORY NO. 22: List each and every facility, including location and
12 contact information that has supervisory authority over you for the period covering your
13 federal prison sentence.

14 ANSWER: No supplement.

15 INTERROGATORY NO. 23: Name the primary individual responsible for handling
16 your financial holdings while you were incarcerated at any of the facilities mentioned in the
17 preceding interrogatory.

18 ANSWER: No supplement.

19
20 
21 FREDRICK RIZZOLO

22 STATE OF NEVADA)
23) SS.
24 COUNTY OF CLARK)

25 FREDRICK RIZZOLO, being first duly sworn, deposes and says:

26 That he a Defendant in the above entitled action; that he has read the foregoing
27 DEFENDANT FREDRICK RIZZOLO'S ANSWERS TO THIRD SUPPLEMENTAL ANSWERS TO
28 FIRST SET OF INTERROGATORIES and knows the contents thereof, and that the same is

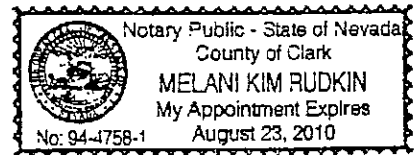
1 true of his own knowledge except for those matters therein stated on information and
2 belief, and as for those matters he believes it to be true.

3
4 Fredrick Rizzolo
FREDRICK RIZZOLO

5
6 SUBSCRIBED and SWORN to before me

7 this 4th day of January 2010.

8 Melani Kim Rudkin
9 NOTARY PUBLIC



10
11 SUBMITTED BY:

12 LAW OFFICES OF KENNETH G. FRIZZELL, III

13 By Kenneth G. Frizzell, III
14 KENNETH G. FRIZZELL, III, ESQ.
15 Nevada Bar No. 006303
16 509 South 6th Street
17 Las Vegas, Nevada 89101
18 (702) 366-1230
19 Attorney for Defendant Fredrick Rizzolo
20
21
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RECEIPT OF COPY

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RECEIPT OF A COPY of the foregoing DEFENDANT FREDRICK RIZZOLO'S ANSWERS TO THIRD SUPPLEMENTAL ANSWERS TO FIRST SET OF INTERROGATORIES is hereby acknowledged this _____ day of _____, 2010.

By _____
George P. Kelesis, Esq.
Mark B. Bailus, Esq.
Marc P. Cook, Esq.
Bailus, Cook & Kelesis, Ltd.
400 South 4th Street, #300
Las Vegas, NV 89101

RECEIPT OF A COPY of the foregoing DEFENDANT FREDRICK RIZZOLO'S ANSWERS TO THIRD SUPPLEMENTAL ANSWERS TO FIRST SET OF INTERROGATORIES is hereby acknowledged this _____ day of _____, 2010.

By _____
C. Stanley Hunterton, Esq.
Hunterton & Associates
333 South 6th Street
Las Vegas, NV 89101

RECEIPT OF A COPY of the foregoing DEFENDANT FREDRICK RIZZOLO'S ANSWERS TO THIRD SUPPLEMENTAL ANSWERS TO FIRST SET OF INTERROGATORIES is hereby acknowledged this _____ day of _____, 2010.

By _____
J. Colby Williams, Esq.
Wade W. Rabenhorst, Esq.
Donald J. Campbell, Esq.
Jack F. DeGree, Esq.
Campbell and Williams
700 South 7th Street
Las Vegas, NV 89101

1 LAW OFFICES OF KENNETH G. FRIZZELL, III
 KENNETH G. FRIZZELL, III, ESQ.
 2 Nevada Bar No.: 006303
 509 South Sixth Street
 3 Las Vegas, Nevada 89101
 Telephone: (702) 366-1230
 4 Facsimile: (702) 384-9961
 Attorney for Defendants
 5 FREDRICK J. RIZZOLO
 RICK AND LISA RIZZOLO FAMILY TRUST
 6 RICK J. RIZZOLO SEPARATE PROPERTY TRUST and RJR TRUST

7 UNITED STATES DISTRICT COURT

8 DISTRICT OF NEVADA

9 * * *

10 KIRK and AMY HENRY,
 11 Plaintiffs,

12 vs.

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

19 Defendants.

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

DEFENDANT FREDRICK
 RIZZOLO'S SECOND
 SUPPLEMENTAL ANSWERS TO
 FIRST SET OF REQUESTS FOR
 PRODUCTION

20
 21 COMES NOW, Defendant FREDRICK RIZZOLO, by and through his Counsel of
 22 Record, KENNETH G. FRIZZELL, III, ESQ., and supplements his response to Plaintiffs' First Set
 23 of Requests for Productions as follows:

24 REQUEST NO. 1: Produce any federal and state income tax returns for the years
 25 2000 through 2008 as filed by Defendant, regardless of whether such filing was jointly with
 26 another or individually or as a principal member of a business entity.

27 RESPONSE: Presently requesting this information from the IRS, and will provide said
 28 documents once received.

1 REQUEST NO. 2: Produce the motor vehicle registration care for each car, truck,
2 trailer or other vehicle at the present time owned by Defendant either individually or jointly
3 with another person.

4 RESPONSE: No supplement. Additionally, this request is subject to the collateral
5 source rule, and Plaintiffs may obtain this information from the Nevada DMV.

6 REQUEST NO. 3: Produce all data and registration for all motor vehicles owned or
7 operated by Defendant at any time between 2001 to the present date.

8 RESPONSE: No supplement. Additionally, this request is subject to the collateral
9 source rule, and Plaintiffs may obtain this information from the Nevada DMV.

10 REQUEST NO. 4: Produce all deeds, mortgages or other documents of title which
11 reflect, record, refer or relate to any interest in real property owned by Defendant either
12 alone or jointly with another person at any time from 2001 to the present date.

13 RESPONSE: No supplement.

14 REQUEST NO. 5: Produce all documents pertaining to any and all safe deposit boxes
15 maintained in the name of the Defendant either alone or jointly with another person.

16 RESPONSE: No supplement.

17 REQUEST NO. 6: Produce all stock certificates, bonds, debentures, certificates of
18 deposit or any other security owned by Defendant, either alone or jointly with another
19 person.

20 RESPONSE: The Federal Court has provided appropriate copies of information
21 provided to the United States Government through the United States Probation
22 Department under document #248.

23 See attached statements in Exhibit "1" for the following: Nevada Commerce Bank,
24 Account #: [REDACTED] for Lions Limited Partnership, balance \$280.00; Oppenheimer,
25 Account #: [REDACTED], balance \$0.63; John Hancock Life Insurance policy has a value
26 of \$259,680.93 and was awarded to ex-spouse in the divorce. Additional lien against policy
27 by divorce judgment as collateral against judgment obligations. Dominick Rizzolo is Trustee
28 for Lisa Rizzolo; Energy Transfer Partners LP, Account #: [REDACTED] held as SEP

1 Investment, balance \$10,334.00; PrimeAmerica IRA, Account #: [REDACTED] balance
2 \$61,714.91 (documentation not available at this time).

3 REQUEST NO. 7: Produce all documents, including but not limited to statements of
4 account with securities brokerage firms, dividend statements, earnings reports or similar
5 documents which reflect, refer or relate to any stocks, bonds, debentures, certificates of
6 deposit, or any other security owned by Defendant either alone or jointly with another
7 person, at any time since September 20, 2001, to the present date.

8 RESPONSE: No supplement. See Response to Request #6 above.

9 REQUEST NO. 8: Produce all documents which reflect, refer or relate to any interests
10 held by Defendant in any partnerships, general or limited, or corporations at any time from
11 September 20, 2001, to the present date.

12 RESPONSE: No supplement.

13 REQUEST NO. 9: Produce all titles, leases or other evidence of any possessory
14 interest for any house, apartment, office, warehouse, garage, or other real estate held by
15 Defendant since September 20, 2001, to the present date.

16 RESPONSE: No supplement.

17 REQUEST NO. 10: Produce all documents which record, reflect, refer or relate to any
18 boats, snowmobiles, airplanes or other recreational vehicles owned by Defendant, either
19 alone or jointly with another person, from September 20, 2001, to the present date.

20 RESPONSE: No supplement.

21 REQUEST NO. 11: Produce all insurance policies, including life, personal property,
22 automobile, homeowners, or business liability insurance policies, owned by Defendant or
23 under which Defendant is or was named as a beneficiary, at any time from September 20,
24 2001, to the present date.

25 RESPONSE: See Response to Request #6 above.

26 REQUEST NO. 12: Produce all documents which reflect, refer, record or relate to any
27 interest in a pension or profit sharing plan owned by Defendant at any time from
28 September 20, 2001, to the present date.

1 RESPONSE: See Response to Request #6 above.

2 REQUEST NO. 13: Produce all documents which reflect, refer, record or relate to any
3 trust under which Defendant is or was settlor or beneficiary, at any time from September
4 20, 2001, to the present date.

5 RESPONSE: No supplement.

6 REQUEST NO. 14: Produce all documents which reflect, refer, record or relate to any
7 assignments or transfers of real or personal property made by Defendant to any other
8 person at any time from September 20, 2001, to the present date.

9 RESPONSE: No supplement.

10 REQUEST NO. 15: Produce all documents which constitute or embody all
11 applications for loans, credit and/or financial assistance made or submitted by Defendant,
12 either alone or jointly with another person, at any time from September 20, 2001, to the
13 present date whether personal or on behalf of any entity in which Defendant held an
14 interest of any kind or type.

15 RESPONSE: No supplement.

16 REQUEST NO. 16: Produce all documents which reflect, record, refer or relate to,
17 or contain information concerning the financial condition and/or net worth of Defendant
18 at any time during the period from September 20, 2001, to the present date.

19 RESPONSE: The Federal Court has provided appropriate copies of information
20 provided to the United States Government through the United States Probation
21 Department under document #248.

22 REQUEST NO. 17: Produce all gift tax returns filed by Defendant since September
23 20, 2001.

24 RESPONSE: No supplement.

25 REQUEST NO. 18: Produce all other books, records, receipts, contracts, agreements,
26 invoices, documents of title, ownership, or indebtedness, or documents otherwise
27 pertaining to the assets of the Defendant.

28 RESPONSE: No supplement.

1 REQUEST NO. 19: Produce copies of any written employment contracts to which
2 Defendant is a party.

3 RESPONSE: No supplement.

4 REQUEST NO. 20: Produce W-2 statements for the period 2001 through 2007.

5 RESPONSE: No supplement.

6 REQUEST NO. 21: Produce documents reflecting income received in connection
7 with Defendant's employment since September 20, 2001, to the present date.

8 RESPONSE: No supplement.

9 REQUEST NO. 22: Produce documents which record or reflect gifts given to or
10 received from relatives, friends, or any other individual or entity during the years 2001
11 through the present date.

12 RESPONSE: No supplement.

13 REQUEST NO. 23: Produce documents which record, reflect, refer or relate to
14 Defendant's domestic and/or foreign bank accounts, regardless of whether the same be
15 held in sole or joint names since September 20, 2001, to the present date.

16 RESPONSE: No supplement. Additionally, this request is subject to the collateral
17 source rule, and as such, Plaintiffs may subpoena the account statements directly from the
18 bank.

19 REQUEST NO. 24: Produce documents which identify or record all kinds of tangible
20 personal property owned in whole or in part by Defendant since September 20, 2001, to
21 the present date.

22 RESPONSE: No supplement.

23 REQUEST NO. 25: Produce copies of Defendant's financial statement prepared at
24 any time during the period September 20, 2001, to the present date.

25 RESPONSE: No supplement. The Federal Court has provided appropriate copies
26 of information provided to the United States Government through the United States
27 Probation Department under document #248.

28 REQUEST NO. 26: Produce any and all documents which record, reflect, refer or

1 relate to Defendant's divorce decree with Defendant Lisa Rizzolo since September 20, 2001.

2 RESPONSE: No supplement.

3 REQUEST NO. 27: Produce documents which record, reflect, refer or relate to any
4 outstanding claims by creditors against you.

5 RESPONSE: No supplement.

6 REQUEST NO. 28: Produce documents which record, reflect, refer or relate to any
7 causes of action or claims you have against any individual or business entity.

8 RESPONSE: The lawsuit against Michael Signorelli is a matter of public record and
9 may be obtained online.

10 The sale of the Crazy Horse, dependent on protection of the name and the previous
11 FDIC sale of the underlying loan. See copies of these documents attached as Exhibit "2".

12 REQUEST NO. 29: Produce documents which record, reflect, refer or relate to any
13 will which identifies you as an heir-at-law or beneficiary under said will.

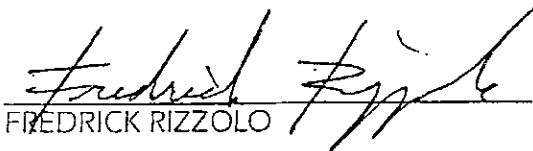
14 RESPONSE: No supplement

15 REQUEST NO. 30: Produce documents which record, reflect, refer or relate to your
16 incarceration at the institutions you have referenced in Interrogatory No. 22.

17 RESPONSE: No supplement.

18 REQUEST NO. 31: For each document you contend you cannot produce, state a
19 time and place for when and where said documentation may be inspected.

20 RESPONSE: No supplement. This is not a request for a document and therefore no
21 response is required.

22 
FREDRICK RIZZOLO


23
24 STATE OF NEVADA)
25 COUNTY OF CLARK) SS.

26 FREDRICK RIZZOLO, being first duly sworn, deposes and says:

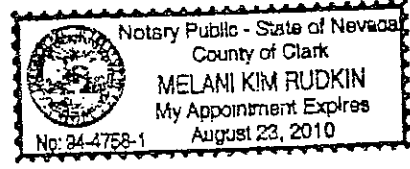
27 That he a Defendant in the above entitled action; that he has read the foregoing
28 DEFENDANT FREDRICK RIZZOLO'S SECOND SUPPLEMENTAL ANSWERS TO FIRST SET

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OF REQUESTS FOR PRODUCTION and knows the contents thereof, and that the same is true of his own knowledge except for those matters therein stated on information and belief, and as for those matters he believes it to be true.


FREDRICK RIZZOLO

SUBSCRIBED and SWORN to before me
this 4th day of January, 2010.




NOTARY PUBLIC

SUBMITTED BY:
LAW OFFICES OF KENNETH G. FRIZZELL, III
By 
KENNETH G. FRIZZELL, III, ESQ.
Nevada Bar No. 006303
509 South 6th Street
Las Vegas, Nevada 89101
(702) 366-1230
Attorney for Defendant Fredrick Rizzolo

RECEIPT OF COPY

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RECEIPT OF A COPY of the foregoing DEFENDANT FREDRICK RIZZOLO'S SECOND SUPPLEMENTAL ANSWERS TO FIRST SET OF REQUESTS FOR PRODUCTION is hereby acknowledged this _____ day of _____, 2010.

By _____
George P. Kelesis, Esq.
Mark B. Bailus, Esq.
Marc P. Cook, Esq.
Bailus, Cook & Kelesis, Ltd.
400 South 4th Street, #300
Las Vegas, NV 89101

RECEIPT OF A COPY of the foregoing DEFENDANT FREDRICK RIZZOLO'S SECOND SUPPLEMENTAL ANSWERS TO FIRST SET OF REQUESTS FOR PRODUCTION is hereby acknowledged this _____ day of _____, 2010.

By _____
C. Stanley Hunterton, Esq.
Hunterton & Associates
333 South 6th Street
Las Vegas, NV 89101

RECEIPT OF A COPY of the foregoing DEFENDANT FREDRICK RIZZOLO'S SECOND SUPPLEMENTAL ANSWERS TO FIRST SET OF REQUESTS FOR PRODUCTION is hereby acknowledged this _____ day of _____, 2010.

By _____
J. Colby Williams, Esq.
Wade W. Rabenhorst, Esq.
Donald J. Campbell, Esq.
Jack F. DeGree, Esq.
Campbell and Williams
700 South 7th Street
Las Vegas, NV 89101

1 LAW OFFICES OF KENNETH G. FRIZZELL, III
 KENNETH G. FRIZZELL, III, ESQ.
 2 Nevada Bar No.: 006303
 509 South Sixth Street
 3 Las Vegas, Nevada 89101
 Telephone: (702) 366-1230
 4 Facsimile: (702) 384-9961
 Attorney for Defendants
 5 FREDRICK J. RIZZOLO
 RICK AND LISA RIZZOLO FAMILY TRUST
 6 RICK J. RIZZOLO SEPARATE PROPERTY TRUST and RJR TRUST

7 UNITED STATES DISTRICT COURT
 8 DISTRICT OF NEVADA

9 * * *

10 KIRK and AMY HENRY,
 11 Plaintiffs,

12 vs.

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

19 Defendants.

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

DEFENDANT FREDRICK
 RIZZOLO'S THIRD
 SUPPLEMENTAL ANSWERS TO
 FIRST SET OF REQUESTS FOR
 PRODUCTION

20 COMES NOW, Defendant FREDERICK RIZZOLO, by and through his Counsel of
 21 Record, KENNETH G. FRIZZELL, III, ESQ., and supplements his response to Plaintiffs' First Set
 22 of Requests for Productions as follows:

23 REQUEST NO. 1: Produce any federal and state income tax returns for the years
 24 2000 through 2008 as filed by Defendant, regardless of whether such filing was jointly with
 25 another or individually or as a principal member of a business entity.

26 RESPONSE: Counsel requested the information sought from Plaintiffs' from the IRS.
 27 A response was received stating that they were unable to provide any of the items
 28 requested. Additionally, Defendant Rizzolo's accountant has provided a letter documenting

1 that Defendant Rizzolo did not file a tax return for 2008, as he did not meet the minimum
2 filing requirements set by the IRS. Exhibit "1".

3 REQUEST NO. 2: Produce the motor vehicle registration care for each car, truck,
4 trailer or other vehicle at the present time owned by Defendant either individually or jointly
5 with another person.

6 RESPONSE: Defendant does not own a vehicle. However, he has produced a copy
7 of the registration billing for the Mercedes owned by Lions Limited, LLC, for which he is an
8 operator of said vehicle. Exhibit "2".

9 REQUEST NO. 3: Produce all data and registration for all motor vehicles owned or
10 operated by Defendant at any time between 2001 to the present date.

11 RESPONSE: No supplement. Additionally, this request is subject to the collateral
12 source rule, and Plaintiffs may obtain this information from the Nevada DMV.

13 REQUEST NO. 4: Produce all deeds, mortgages or other documents of title which
14 reflect, record, refer or relate to any interest in real property owned by Defendant either
15 alone or jointly with another person at any time from 2001 to the present date.

16 RESPONSE: No supplement.

17 REQUEST NO. 5: Produce all documents pertaining to any and all safe deposit boxes
18 maintained in the name of the Defendant either alone or jointly with another person.

19 RESPONSE: No supplement.

20 REQUEST NO. 6: Produce all stock certificates, bonds, debentures, certificates of
21 deposit or any other security owned by Defendant, either alone or jointly with another
22 person.

23 RESPONSE: No Supplement

24 REQUEST NO. 7: Produce all documents, including but not limited to statements of
25 account with securities brokerage firms, dividend statements, earnings reports or similar
26 documents which reflect, refer or relate to any stocks, bonds, debentures, certificates of
27 deposit, or any other security owned by Defendant either alone or jointly with another
28 person, at any time since September 20, 2001, to the present date.

1 RESPONSE: No supplement.

2 REQUEST NO. 8: Produce all documents which reflect, refer or relate to any interests
3 held by Defendant in any partnerships, general or limited, or corporations at any time from
4 September 20, 2001, to the present date.

5 RESPONSE: No supplement.

6 REQUEST NO. 9: Produce all titles, leases or other evidence of any possessory
7 interest for any house, apartment, office, warehouse, garage, or other real estate held by
8 Defendant since September 20, 2001, to the present date.

9 RESPONSE: No supplement.

10 REQUEST NO. 10: Produce all documents which record, reflect, refer or relate to any
11 boats, snowmobiles, airplanes or other recreational vehicles owned by Defendant, either
12 alone or jointly with another person, from September 20, 2001, to the present date.

13 RESPONSE: No supplement.

14 REQUEST NO. 11: Produce all insurance policies, including life, personal property,
15 automobile, homeowners, or business liability insurance policies, owned by Defendant or
16 under which Defendant is or was named as a beneficiary, at any time from September 20,
17 2001, to the present date.

18 RESPONSE: No supplement.

19 REQUEST NO. 12: Produce all documents which reflect, refer, record or relate to any
20 interest in a pension or profit sharing plan owned by Defendant at any time from
21 September 20, 2001, to the present date.

22 RESPONSE: No supplement.

23 REQUEST NO. 13: Produce all documents which reflect, refer, record or relate to any
24 trust under which Defendant is or was settlor or beneficiary, at any time from September
25 20, 2001, to the present date.

26 RESPONSE: No supplement.

27 REQUEST NO. 14: Produce all documents which reflect, refer, record or relate to any
28 assignments or transfers of real or personal property made by Defendant to any other

1 person at any time from September 20, 2001, to the present date.

2 RESPONSE: No supplement.

3 REQUEST NO. 15: Produce all documents which constitute or embody all
4 applications for loans, credit and/or financial assistance made or submitted by Defendant,
5 either alone or jointly with another person, at any time from September 20, 2001, to the
6 present date whether personal or on behalf of any entity in which Defendant held an
7 interest of any kind or type.

8 RESPONSE: No supplement.

9 REQUEST NO. 16: Produce all documents which reflect, record, refer or relate to,
10 or contain information concerning the financial condition and/or net worth of Defendant
11 at any time during the period from September 20, 2001, to the present date.

12 RESPONSE: No supplement.

13 REQUEST NO. 17: Produce all gift tax returns filed by Defendant since September
14 20, 2001.

15 RESPONSE: No supplement.

16 REQUEST NO. 18: Produce all other books, records, receipts, contracts, agreements,
17 invoices, documents of title, ownership, or indebtedness, or documents otherwise
18 pertaining to the assets of the Defendant.

19 RESPONSE: No supplement.

20 REQUEST NO. 19: Produce copies of any written employment contracts to which
21 Defendant is a party.

22 RESPONSE: No supplement.

23 REQUEST NO. 20: Produce W-2 statements for the period 2001 through 2007.

24 RESPONSE: No supplement.

25 REQUEST NO. 21: Produce documents reflecting income received in connection
26 with Defendant's employment since September 20, 2001, to the present date.

27 RESPONSE: No supplement.

28 REQUEST NO. 22: Produce documents which record or reflect gifts given to or

1 received from relatives, friends, or any other individual or entity during the years 2001
2 through the present date.

3 RESPONSE: No supplement.

4 REQUEST NO. 23: Produce documents which record, reflect, refer or relate to
5 Defendant's domestic and/or foreign bank accounts, regardless of whether the same be
6 held in sole or joint names since September 20, 2001, to the present date.

7 RESPONSE: No supplement.

8 REQUEST NO. 24: Produce documents which identify or record all kinds of tangible
9 personal property owned in whole or in part by Defendant since September 20, 2001, to
10 the present date.

11 RESPONSE: No supplement.

12 REQUEST NO. 25: Produce copies of Defendant's financial statement prepared at
13 any time during the period September 20, 2001, to the present date.

14 RESPONSE: No supplement.

15 REQUEST NO. 26: Produce any and all documents which record, reflect, refer or
16 relate to Defendant's divorce decree with Defendant Lisa Rizzolo since September 20, 2001.

17 RESPONSE: No supplement.

18 REQUEST NO. 27: Produce documents which record, reflect, refer or relate to any
19 outstanding claims by creditors against you.

20 RESPONSE: American Express Credit Card Statements for account ending in [REDACTED]
21 showing a zero (0) balance, and printouts from January 11, 2008 to present, indicating
22 purchases made on that card. Exhibit "4".

23 U.S. Airways Master Card for account ending in [REDACTED] with a current
24 outstanding balance of \$2,528.64, statements on this account from March 2008 through
25 February 2009, and April 2009 through February 2010. Exhibit "5".

26 REQUEST NO. 28: Produce documents which record, reflect, refer or relate to any
27 causes of action or claims you have against any individual or business entity.

28 RESPONSE: No supplement.

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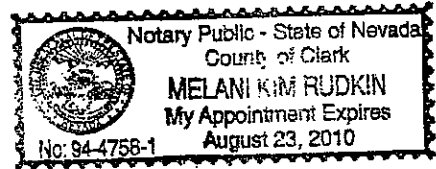
REQUESTS FOR PRODUCTION and knows the contents thereof, and that the same is true of his own knowledge except for those matters therein stated on information and belief, and as for those matters he believes it to be true.

Frederick Rizzolo
FREDRICK RIZZOLO

SUBSCRIBED and SWORN to before me

this 25th day of February 2010.

Melani Kim Rudkin
NOTARY PUBLIC



SUBMITTED BY:

LAW OFFICES OF KENNETH G. FRIZZELL, III

By *Kenneth G. Frizzell, III*

KENNETH G. FRIZZELL, III, ESQ.
Nevada Bar No. 006303
509 South 6th Street
Las Vegas, Nevada 89101
(702) 366-1230
Attorney for Defendant Frederick Rizzolo

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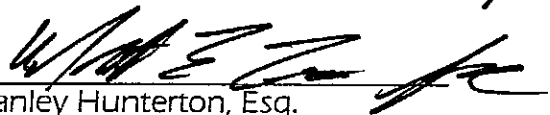
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2 RECEIPT OF A COPY of the foregoing DEFENDANT FREDRICK RIZZOLO'S THIRD
3 SUPPLEMENTAL ANSWERS TO FIRST SET OF REQUESTS FOR PRODUCTION is hereby
4 acknowledged this _____ day of _____, 2010.

5 By _____

6 George P. Kelesis, Esq.
7 Mark B. Bailus, Esq.
8 Marc P. Cook, Esq.
9 Bailus, Cook & Kelesis, Ltd.
10 400 South 4th Street, #300
11 Las Vegas, NV 89101
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By 
C. Stanley Hunterton, Esq.
Hunterton & Associates
333 South 6th Street
Las Vegas, NV 89101

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700 South 7th Street
Las Vegas, NV 89101

9:25