

1 A Yes, sir.

2 Q And what was the result of that bet?

3 A The Cincinnati Reds won and Pete Rose won
4 two thousand dollars.

5 Q And on April 18th, 1987 --

6 A We just went on April 18th.

7 Q April 19th, 1987, did Pete Rose, the
8 Manager of the Cincinnati Reds, bet on a Cincinnati Reds
9 baseball game through you?

10 A Yes, sir.

11 Q And did you place that bet for him?

12 A Yes, sir, I did.

13 Q What was the result of that bet?

14 A The Cincinnati Reds won -- or, I'm sorry,
15 excuse me. The Cincinnati Reds lost on April 19th and Pete
16 lost two thousand dollars.

17 Q On April 20th, 1987, did Pete Rose, the
18 Manager of the Cincinnati Reds, bet on a Cincinnati Reds
19 baseball game?

20 A Yes, sir, he did.

21 Q Did you place that bet for him?

22 A Yes, sir, I did.

23 Q And did he know you were placing that bet
24 for him?

25 A Yes, sir, he did.

1 Q And in all the previous games that I've
2 listed, did Pete Rose ask you to bet for him on those
3 baseball games?

4 A Yes, sir, he did.

5 Q And did he know who you were placing that
6 bet with?

7 A He certainly did.

8 Q And had that bookmaker extended credit to
9 Pete Rose or to you on those baseball games?

10 A He extended credit to Pete Rose because he
11 had set up things in Florida with Pete Rose.

12 Q Now, on April 20th, 1987, did Pete Rose, as
13 Manager of the Cincinnati Reds baseball club, place a bet
14 on the Cincinnati Reds baseball game?

15 A Yes, sir, he did.

16 Q And did you place it for him?

17 A Yes, sir, I did.

18 Q And did he ask you to place it for him?

19 A Yes, sir, he did.

20 Q And what was the result of that bet?

21 A On the 20th of April the Reds won and Pete
22 Rose won two thousand dollars.

23 Q On April 22nd, 1987, did you place a bet
24 for Pete Rose, the Manager of the Cincinnati Reds, on a
25 Cincinnati Reds baseball game?

1 A Yes, sir, I did.

2 Q And did he know that you were placing that
3 bet?

4 A He certainly did.

5 Q Did he ask you to place that bet?

6 A Yes, sir.

7 Q And did he know with whom you were placing
8 that bet?

9 A Yes, sir.

10 Q And credit had been extended to him by that
11 bookmaker for that bet?

12 A Yes, sir.

13 Q Okay. On April 24th, 1987, did Pete Rose,
14 as General Manager -- or as Manager, rather, of the
15 Cincinnati Reds, place a bet through you on the Cincinnati
16 Reds baseball game?

17 A Yes, sir, he did.

18 Q And what was the result of that bet?

19 A On the 24th of April the Cincinnati Reds
20 won their baseball game; Pete Rose won twenty-six hundred
21 dollars.

22 Q On April 28th, 1987, did Pete Rose, Manager
23 of the Cincinnati Reds, place a bet through you on the
24 Cincinnati Reds baseball game?

25 A Yes, sir, he did.

1 Q And did he know you were placing that bet?

2 A Yes, sir.

3 Q Did he ask you to place that bet?

4 A Yes, sir.

5 Q And what was the result of that bet?

6 A The Reds lost that game on April the 28th
7 and Pete Rose lost four thousand dollars.

8 Q On April 29th, 1987, did Pete Rose, Manager
9 of the Cincinnati Reds, ask you to place a bet on a
10 Cincinnati Reds baseball game?

11 A Yes, sir, he did.

12 Q And did you place that bet?

13 A Yes, sir.

14 Q And did he know you were placing that bet?

15 A Yes, sir.

16 Q And he asked you to place that bet?

17 A Yes, sir.

18 Q And what was the result of that bet?

19 A On the 29th of April the Cincinnati Reds
20 lost and Pete Rose lost four thousand dollars.

21 Q And that was April 29th, 1987?

22 A Yes, sir.

23 Q On April 30th, 1987, did Pete Rose, Manager
24 of the Cincinnati Reds, place a bet through you on the
25 Cincinnati Reds baseball game?

1 A Yes, sir.

2 Q And did he know you were placing the bet?

3 A Yes, sir.

4 Q Did he ask you to place that bet?

5 A Yes, sir.

6 Q And did you place that bet with the
7 bookmaker in New York?

8 A On April the 30th I was calling the bookie,
9 Val, in New York direct, and so I would say, yes, sir, I
10 did call direct and place a bet for Pete Rose on the
11 Cincinnati Reds.

12 Q Okay. On May 1st, 1987, did Pete Rose, as
13 Manager of the Cincinnati Reds, through you place a bet on
14 the Cincinnati Reds baseball game?

15 A Yes, sir.

16 Q And did he ask you to place that bet?

17 A Yes, sir, he did.

18 Q And what was the result of that bet?

19 A On May the 1st the Cincinnati Reds won
20 their baseball game.

21 Q And did you place that bet with a bookmaker
22 known as Val in New York?

23 A Yes, sir, I did.

24 Q May 2nd, 1987, did Pete Rose, Manager of
25 the Cincinnati Reds, ask you to place a bet on the

1 Cincinnati Reds baseball game with Val, a bookmaker in New
2 York?

3 A Yes, sir.

4 Q What was the result of that bet?

5 A On May the 2nd the Cincinnati Reds lost
6 their game. Pete Rose lost twenty-six hundred dollars.

7 Q And on May 3rd, 1987, did Pete Rose,
8 Manager of the Cincinnati Reds, ask you to place a bet on
9 the Cincinnati Reds baseball game played on that day with a
10 bookmaker in New York?

11 A Yes, he did.

12 Q Okay. And did you place that bet?

13 A Yes, sir, I did.

14 Q And what was the result of that bet?

15 A The Cincinnati Reds won on May the 3rd and
16 Pete Rose won two thousand dollars.

17 Q And on May 5th, 1987, did Pete Rose, as
18 Manager of the Cincinnati Reds, ask you to place a bet on
19 the Cincinnati Reds baseball game with a bookmaker in New
20 York?

21 A Yes, sir.

22 Q And did you place that bet?

23 A Yes, sir.

24 Q And the result of that bet was what?

25 A The Cincinnati Reds won; Pete Rose won

1 twenty-six hundred dollars on that game.

2 Q On May 8th, 1987 -- did we cover May 5th?
3 We covered May 5th?

4 A Uh-huh. That's where we just came from.

5 Q May 8th, 1987, did you place a bet on the
6 Cincinnati Reds baseball game?

7 A Yes, sir, I did.

8 Q Did you do it at the request of Pete Rose?

9 A Yes, sir, I did.

10 Q Pete Rose was Manager of the Cincinnati
11 Reds?

12 A Yes, sir.

13 Q And the result of that bet was what, sir?

14 A On May the 8th the Cincinnati Reds won;
15 Pete Rose won two thousand dollars.

16 Q On May 9th, 1987, did you place a bet on
17 the Cincinnati Reds for Pete Rose, who was then Manager of
18 the Cincinnati Reds?

19 A Yes, sir, I did.

20 Q And did you place it with a bookmaker in
21 New York?

22 A Yes, sir, I did.

23 Q And Mr. Rose -- what was the result of Mr.
24 Rose's bet?

25 A The Cincinnati Reds lost that game.

1 Q Okay. On May 10th, 1987, did Pete Rose, as
2 Manager of the Cincinnati Reds, place a bet on the
3 Cincinnati Reds baseball game?

4 A Yes, sir, he did.

5 Q And what was the result of that bet?

6 A On May the 10th the Cincinnati Reds lost;
7 Pete Rose lost thirty-four hundred dollars.

8 Q May 11th, 1987, did Pete Rose, Manager of
9 the Cincinnati Reds, bet on the Cincinnati Reds baseball
10 game?

11 A Yes, sir.

12 Q Did you place that bet for him?

13 A Yes, sir, I did.

14 Q Did he ask you to do it?

15 A Yes, sir.

16 Q Did you place it with a bookmaker in New
17 York?

18 A Yes, sir.

19 Q And what was the result of that bet?

20 A The Cincinnati Reds won on May the 11th and
21 Pete Rose won two thousand dollars.

22 Q And on May 12th, 1987, did Pete Rose, as
23 Manager of the Cincinnati Reds, ask you to place a bet on
24 the Cincinnati Reds baseball game?

25 A Yes, sir, he did.

1 Q And did you place that bet?

2 A Yes, sir.

3 Q And what was the result of that bet?

4 A On May the 12th the Cincinnati Reds lost;
5 Pete Rose lost twenty-eight hundred dollars.

6 Q Okay. Now, Mr. Janszen, did there come a
7 time when you stopped placing bets with the bookmaker in
8 New York?

9 A Yes, sir.

10 Q Would you tell us why?

11 A The whole time period since we came back
12 from Florida up until the middle of May, Pete was very much
13 strapped for cash. And we were getting behind -- or I
14 should say he was getting behind on his money owed the
15 bookie.

16 I actually had won a little money over this
17 time period. And that was just being deducted from the
18 money that Pete Rose had lost.

19 I sent a considerable amount of money of my
20 own to Steve Chevashore and to Val in New York to help pay
21 some of this debt that Pete Rose had incurred.

22 Q How did you send that money?

23 A I sent the money; cash. Went to my safety
24 deposit box, sent cash and sent it through Federal Express.

25 Q Now, did there come a time when Val would

1 no longer extend credit to Pete Rose?

2 A Yes, sir.

3 Q And thus you could not place any more bets?

4 A Yes, sir.

5 Q Did you discuss that with Pete Rose?

6 A Yes, sir. Every Monday I would tell Pete
7 that the bookies were, Steve Chevashore and Val, were
8 becoming more and more angry that the whole balance was not
9 being taken care of. And that they were going to cut Pete
10 Rose off and not accept any more of his betting unless he'd
11 take care of the balance. Which was approximately
12 thirteen, fourteen thousand dollars.

13 I told Pete that they had threatened to cut
14 us off. They would no longer take his action. And he told
15 me that all bookies say that and not to worry about it.

16 Q Did you place any more bets with Val in New
17 York for Pete Rose?

18 A What happened was, Pete Rose called, the
19 very last time he called me to have me place baseball bets
20 through Val in New York, he gave me the teams that he
21 wanted, he -- he was out of town at the time. I called Val
22 in New York. Val told me that he was no longer going to
23 take any more of Pete's action. That he had warned me to
24 tell Pete long before that if things were not squared away
25 the people in his office that he worked for were not going

1 to tolerate it, no matter who it was. No matter if it was
2 Pete Rose or, you know, the President of the United States.
3 They would not take any more action until the balance was
4 paid.

5 Q All right. Did Pete Rose ask you to place
6 bets on sporting events, including baseball, with any other
7 bookmaker?

8 A Yes, sir, he did.

9 Q And who was that bookmaker?

10 A Ron Peters.

11 Q And where was Ron Peters located?

12 A Ron Peters lived in Franklin, Ohio.

13 Q And did you communicate with Ron Peters?

14 A Yes, sir, I did.

15 Q And how did you do that?

16 A I called Ron Peters on the phone. I
17 introduced myself. Ron Peters said that he had heard of me
18 before, never personally met me before, but he had heard
19 that I was a guy that he would not -- that he would feel
20 comfortable with. And he said that, yes, he would accept
21 Pete's action.

22 Q Let me show you a check under tab number
23 45, which is check number 380 dated March 12th, 1987, paid
24 to the order of Tommy Gioiosa in the amount of \$34,000,
25 written on the Provident Bank, Cincinnati, Ohio, Peter E.

1 Rose, 105 East 4th Street, Suite 800, Cincinnati, Ohio.
2 It's called the 4th Street Income Trust.

3 Have you ever seen that check and when was
4 the first time that you ever saw that check?

5 A Yes, sir, I've seen it before.

6 Q When did you first see that check, sir?

7 A I saw a copy of this check when Pete Rose
8 handed it to me in May of 1987.

9 Q And why did he hand you the check?

10 A When I first contacted Ron Peters on behalf
11 of Pete Rose and asked him -- and discussed with him in May
12 of 1987 about taking Pete's action, Ron Peters told me that
13 he would take Pete's action but that there was still a
14 balance of thirty-four thousand or -- I don't know what the
15 -- there was still a balance that Pete Rose owed him for
16 past betting.

17 And I told him that as far as I knew, that
18 Pete had squared up with Ron Peters. And that while Pete
19 was in spring training in 1987 he had okayed Reuven Katz to
20 give this check to Tommy Gioiosa.

21 Q Is this what Pete Rose had told you?

22 A Yes, sir.

23 Q And you related that to Ron Peters?

24 A I told Ron Peters that indeed a check for
25 \$34,000 had been issued to Tommy Gioiosa and that if Ron

1 Peters had not received that money it was only because
2 Tommy Gioiosa had not given it to him.

3 Q Did you show Ron Peters this check?

4 A Yes, sir, I did. I showed him a copy of
5 the check.

6 Q A copy of the check I mean.

7 (A short recess.)

8 BY MR. DOWD:

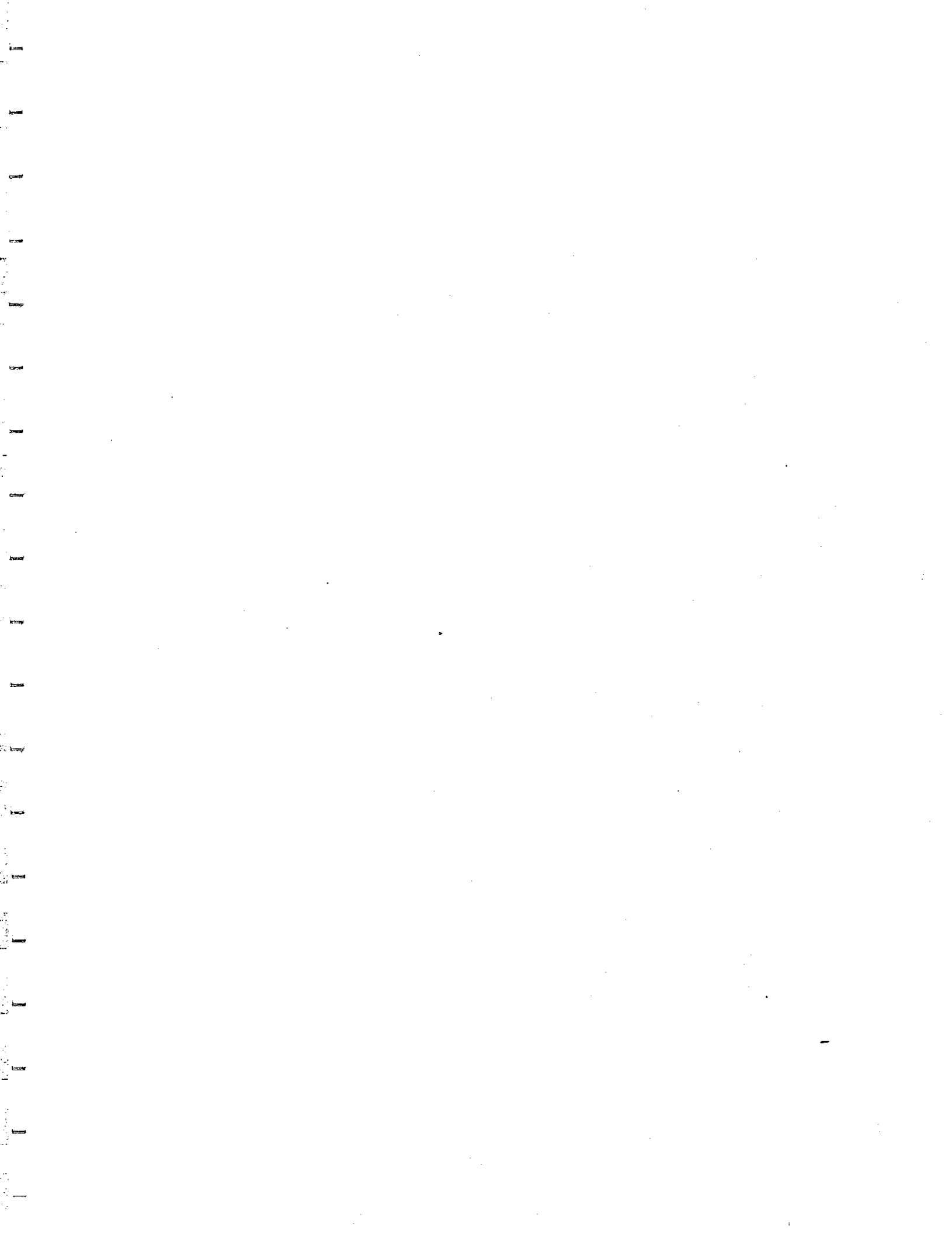
9 Q Paul, before we go any further, with
10 respect to Ron Peters, describe the mechanics of how you
11 placed Pete's bets with Chevashore and Val.

12 No particular dates. Just sort of the
13 mechanics of how you would communicate with Pete and how
14 you communicated with them.

15 A Well, depending if Pete was on the road or
16 at home, he would either call me at my home or I would call
17 him. And at the very beginning, for the first couple
18 weeks, Pete would say the names of the teams that he wanted
19 over the phone. Although sometimes he would abbreviate the
20 teams.

21 I remember once instance where he would
22 actually say pitchers and not even the teams. He would
23 just name the starting pitcher.

24 Q All right. So you would just -- let's not
25 get too -- you would communicate with Pete, either in



1 person or by telephone?

2 A Yes, sir.

3 Q Would sometimes you call the clubhouse?

4 A Yes, sir.

5 Q Sometimes he called you from the clubhouse?

6 A Yes, sir.

7 Q Sometimes you'd see him at home?

8 A Yes, sir.

9 Q And then what would you do? Would you
10 check the line and call -- who would you call?

11 A Usually I'd have to make several phone
12 calls to either Stevie Chevashore or to Val to get the
13 line. And sometimes Pete would want to know the line. Not
14 often, but there were times when he would want to know it.
15 Especially if he had a lot of time on his hands that day.

16 And so I would call the bookie and then
17 eventually I'd call him back and place the bets.

18 Q And would you report the results or would
19 Pete determine the results of the betting action himself?

20 A It depended. If I was on -- if Pete was on
21 the road, of course he would check the scores when he got
22 back to his hotel room. And then would record those.

23 If the Cincinnati Reds were playing in
24 Cincinnati, and quite often I would go to the stadium with
25 him, and I would sit about ten rows back watching the game.

1 I would make phone calls from the phones at Riverfront
2 Stadium checking out the scores of the other games that
3 were bet on and would give Pete the results of these games
4 in his office after the Reds' game.

5 Q Did you ever give him any hand signals as
6 to the results of games?

7 A Yes, sir.

8 Q Would you do that in the stadium?

9 A Yes, sir. Just the Cincinnati stadium.

10 Q Right. Was that when the scoreboard was
11 out at Riverfront Stadium?

12 A Yes, sir. The scoreboard was being
13 enlarged or they were putting something new in and the
14 scores from other games being played were not being posted.
15 And he would become curious of how he was doing, say, after
16 the sixth or seventh inning of the Reds game. Because he
17 knew that some of the other games were already over. So he
18 would just basically look up at me and put his hands up
19 like, well, how are we doing?

20 And I would go back, make a phone call,
21 check with the sports line and I'd either come back and try
22 to show him on my fingers how many games he won and how
23 many were lost; or I'd just give him a thumbs up or a
24 thumbs down. Basically just giving him a general feel of
25 what had transpired that night.

1 Q By the way, did Danita Marcum ever take and
2 place bets for Pete Rose?

3 A Oh, sure.

4 Q And did she take and place bets on the
5 Cincinnati Reds for Pete Rose?

6 A Yes, sir, she did.

7 Q Did she know that Pete Rose was the Manager
8 of the Cincinnati Reds?

9 A Oh, sure.

10 Q And did she make the calls either to
11 Chevashore or to Val and place the bets?

12 A Yes, sir.

13 Q And that was because you weren't around?

14 A If I got -- that's correct. Sometimes I
15 got held up in traffic.

16 Q Did you ever go on the road with Pete and
17 the team?

18 A Yes, sir, I did.

19 Q Can you remember any of the cities you went
20 to?

21 A We went to Philadelphia a couple times. We
22 went to New York, Shea Stadium. We went to Chicago,
23 Wrigley Field. We went to St. Louis and Pittsburgh.

24 Q Did you ever go to Los Angeles?

25 A Oh, I'm sorry, yes, sir. We went to Los

1 Angeles also.

2 Q And while you were on the road with Pete,
3 did you place bets for Pete Rose?

4 A Yes, sir, I did.

5 Q And that included bets on the Cincinnati
6 Reds?

7 A Yes, sir.

8 Q And he was the Manager of the Cincinnati
9 Reds at the time?

10 A Yes, sir, he was.

11 Q And this was during 1987?

12 A This was during 1987 only.

13 Q During 1987 baseball season?

14 A Yes, sir.

15 Q And did you stay in the same hotel room or
16 suite with Pete and the team?

17 A I stayed in the same hotel room.

18 Q Do you recall an occasion when Pete
19 received a call from the bookmaker in New York or
20 Chevashore about his indebtedness from gambling?

21 A Yes, sir, I do.

22 Q And do you recall what Pete told them?

23 A Yes, sir.

24 Q Tell me what he said.

25 A I was sitting at Pete's house, which was

1 almost a nightly event if the Reds were at home. And
2 Stevie Chevashore had called earlier and talked to Pete's
3 wife and told her to tell Pete that he would call back
4 later that night.

5 The phone rang; Pete got on the phone and
6 he looked up at me and whispered, "It's Stevie." And they
7 talked for a few moments and Pete said to Steve, "Stevie, I
8 guess Paul was using my name and placing bets the last
9 couple of weeks we were betting." He said, "I quit betting
10 several weeks back and Paul must have continued betting and
11 using my name."

12 The phone conversation was brief. When
13 Pete hung the phone up he laughed and he looked at me and
14 he said, "Hell, Paul, I knew you could handle it. Stevie
15 is afraid of you. He's not going to do anything to you."

16 And I laughed and I said, "That's okay,
17 Pete."

18 Q Was what Pete told Stevie true or false?

19 A It's a lie. False.

20 Q And did you or anyone in your family
21 subsequently receive a threat?

22 A Yes, sir.

23 Q What was that threat?

24 A My mother received several calls. The last
25 call she said the caller told her that her son would be

1 killed if the balance which was owed was not taken care of.

2 Q Did you have a subsequent call with Steve
3 Chevashore where he acknowledged that the threat had been
4 made?

5 A I had a subsequent call. He denied
6 threatening me, but he did say that he did talk to my
7 mother about the situation.

8 Q Now, let's talk about Ron Peters. And you
9 placed bets for Pete with Ron Peters?

10 A Yes, sir.

11 Q During May and June and July of 1987?

12 A Yes, sir. The last game was the All-Star
13 Game.

14 Q And did you bet -- were these bets made on
15 behalf of Pete Rose?

16 A Yes, sir.

17 Q Did Ron Peters know they were made on
18 behalf of Pete Rose?

19 A Yes, sir.

20 Q Would Ron Peters have extended you the
21 credit that was extended on these bets?

22 A Not for that amount.

23 Q Did you place bets on behalf of Pete Rose,
24 while he was the Manager of the Cincinnati Reds, with Ron
25 Peters on Cincinnati Reds baseball games?

1 A Yes, sir, I did.

2 Q In May, June and July of 1987?

3 A Yes, sir, I did.

4 Q Can you recall whether Pete won or lost
5 with respect to baseball, particularly in June and July?

6 A Pete wound up winning approximately forty
7 some thousand dollars during this period of time.

8 Q And did Ron Peters pay Pete Rose that
9 money?

10 A The first week he paid us. The following
11 week --

12 Q And how was that collected by the way?

13 A The first week he paid us close to \$25,000.

14 Q In cash?

15 A In cash.

16 Q And how was that collected?

17 A I drove to Franklin, Ohio and picked that
18 money up.

19 Q Can you recall how many trips you made to
20 Franklin, Ohio?

21 A In what period?

22 Q In that period, May, June, July.

23 A Boy, I...

24 Q Did you ever meet him halfway or at some
25 other spot? That is, Ron Peters.

1 A I can't recall if we met in Middletown
2 maybe a time or two. But I don't recall. I recall only
3 meeting him at his restaurant.

4 Q Jonathan's Cafe?

5 A Jonathan's Cafe.

6 Q In Franklin, Ohio?

7 A Yes, sir.

8 Q Do you recall ever paying any gambling
9 debts on behalf of Pete Rose to Ron Peters?

10 A Yes, sir. The second week that we were
11 betting for -- or that I was placing bets for Pete Rose
12 through Ron Peters, the second week Pete lost a good
13 portion of that money that he had won the first week. And
14 he opened his kitchen cabinet and took out the roll of
15 money which he had not even got into yet, and counted out
16 the amount of money he had lost. And I took it up to Ron
17 Peters.

18 Q Then subsequently Pete won approximately
19 \$44,000 from Ron Peters?

20 A Yes, sir.

21 Q And did Pete want you to collect that
22 money?

23 A Yes, sir, he did.

24 Q And did you collect it?

25 A No, sir, I didn't. I got five hundred

1 dollars here; a thousand dollars there.

2 Q Did you collect any money from Ron Peters
3 for payment to Pete Rose?

4 A Just a very small amount.

5 Q Why didn't Ron Peters pay Pete Rose?

6 A Ron had told me that his wife and him had
7 just gone through a separation. That his wife had found
8 where he hid his cash money and had taken a bag containing
9 thousands of dollars to her attorney and that he did not
10 have the cash available at the present time. But that he
11 was good for it and that we should never feel like we were
12 going to be not paid.

13 Q You did not place bets for Pete Rose after
14 the All-Star Game in July 1987?

15 A No, sir.

16 Q And why not?

17 A Pete felt that he had enough money coming
18 from Ron Peters and that he did not want to bet any more
19 with Ron Peters until he was paid off.

20 Q Did Pete Rose owe you money at this time?

21 A Yes, sir, he did.

22 Q Approximately how much?

23 A At that time he owed me \$44,250.

24 Q Did you have another line of business that
25 you were in at this time in 1987?

1 A I started the Premiere Sports, which was a
2 sports memorabilia business.

3 Q And did Pete Rose help you in that
4 business?

5 A Yes, sir, he did.

6 Q And how did he help you?

7 A Pete introduced me to ballplayers in order
8 to get the autographs. He showed me how to contact the
9 places to get the baseballs. He sent a letter to
10 Louisville Slugger stating that I could have his bats
11 released to me. And basically just the -- you know,
12 opening the doors was the key in this type of business.

13 Q During the time that you were betting for
14 Pete Rose with Val and Chevashore and Peters, did you bet
15 yourself?

16 A Yes, sir, I did.

17 Q And in what amounts; do you recall?

18 A My betting was anywhere from two hundred to
19 five hundred dollars.

20 Q And was that part of the amount that Pete
21 bet or did you put up your own money?

22 A That was my own money.

23 Q Did Danita Marcum place bets on behalf of
24 Pete Rose with Ron Peters?

25 A She placed a few with Ron Peters.

1 Q Okay.

2 A But more bets with Val and Stevie.

3 Q Similar to the same circumstances as with
4 Val and Chevashore; is that correct?

5 A Yes, sir.

6 Q Did there come a time, Mr. Janszen, in
7 either late '87 or early 1988 when you became aware that
8 you were in some difficulty with the Federal law
9 enforcement authorities?

10 A Yes, sir.

11 Q And during that period of time, and
12 subsequent, did you make attempts to collect money from
13 Pete Rose?

14 A I don't know if you would call them
15 attempts. When I was contacted --

16 Q Don't worry about the characterization.
17 Did you try to collect your money?

18 A Yes, sir.

19 Q And was that money owed to you by Pete
20 Rose?

21 A Yes, sir.

22 Q Were you trying to shake him down for money
23 that he did not owe you?

24 A Not at all.

25 Q And did you have occasion to see a

1 gentleman by the name of Reuven Katz? That's R-e-u-v-e-n
2 K-a-t-z.

3 A Yes, sir.

4 Q And who is Mr. Katz?

5 A Reuven Katz was Pete Rose's attorney.

6 Q In Cincinnati, Ohio?

7 A Yes, sir.

8 Q And did you have occasion to go see him?

9 A I met -- yes, sir, I met Reuven Katz a few
10 times at Pete's home and --

11 Q In connection with the collection of this
12 debt.

13 A I met with Reuven Katz in March of 1988 at
14 his office, downtown Cincinnati.

15 Q And would you tell me what you told Mr.
16 Katz?

17 A I went to Reuven's office with Danita
18 Marcum. I told Reuven that I had got myself in some
19 trouble with the law. I told him what my trouble consisted
20 of. I asked him if he could recommend a good attorney. He
21 made several phone calls for me and came up with a couple
22 names, who I contacted after I left his office.

23 I also went into his office and sat down at
24 a table with him and had a conversation with him concerning
25 Pete Rose.

1 Q And what was the substance of that
2 conversation?

3 A I told Reuven Katz that I felt that I had
4 been a very good friend of Pete's and had kept him out of a
5 lot of trouble in the past. But I felt that I was -- it
6 was a time where I -- a time in my life where I needed some
7 of the money that I loaned Pete. I needed to get it back
8 and I needed to get it back quickly for attorney fees for
9 myself.

10 And I explained to Reuven how it came to be
11 that Pete Rose had got in to me and had borrowed that money
12 from me.

13 Q What did you tell Mr. Katz?

14 A I told Reuven Katz about the whole gambling
15 situation. Reuven sat and basically said almost nothing
16 until I was finished.

17 Q Was anybody else present in this
18 conversation?

19 A Yes, sir, Danita Marcum was.

20 Q Anybody else from Mr. Katz' law firm
21 present?

22 A No. No.

23 Q Was Bob Pitcairn present?

24 A No, just Reuven, Danita and myself.

25 Q Did you tell Mr. Katz that you had bet on

1 baseball for Pete Rose?

2 A Yes, sir, I did.

3 Q Did you tell him that you had bet on the
4 Cincinnati Reds?

5 A Yes, sir, I did.

6 Q And what did Mr. Katz say?

7 A Reuven put his head down and he made a
8 gesture with his hands and he said, "That's it; it's over."

9 Q Did he call you a liar?

10 A No, sir.

11 Q Did he ask you who you had placed the bets
12 with?

13 A No, sir.

14 Q Was he surprised?

15 A Only --

16 Q What was your impression?

17 A His reaction was that of just total -- not
18 that he was surprised Pete did it, but that the day finally
19 had come where there was someone sitting across the table
20 from him who was saying, yes, he did. And maybe all of
21 Reuven's things in his head finally came true. Maybe all
22 the fears Reuven had finally came to be.

23 Q Did Mr. Katz suggest in any way that you
24 not share that information with anyone else?

25 A I told Reuven before he brought it up that

1 I would protect Pete with the Federal authorities.

2 Q And did he tell you not to do that?

3 A He said that I had to do what I felt I had
4 to do.

5 Q At this time, in March of 1988, had you had
6 any contact with the Federal authorities?

7 A Previous to...?

8 Q The meeting.

9 A Yes, sir.

10 Q Were they aware you were going to meet with
11 Katz?

12 A No, sir.

13 Q Okay.

14 A It was approximately a week after I was
15 contacted by the FBI that I met with Reuven.

16 Q Now let me show you a check number 296 on
17 the account of Pete E. Rose, P. O. Box 5367, Cincinnati,
18 Ohio. It has the letters and numbers MMP No. 2-1178-6; pay
19 to the order of Paul Janszen, \$10,000. And it says "for
20 loan."

21 And on the back it's indorsed, "Paul
22 Janszen. Make check payable to Merlin Shiverdecker."

23 Is it Shivendecker?

24 A Shiverdecker.

25 Q Shiverdecker. S-h-i-v-e-r-d-e-c-k-e-r. It

1 looks like it's indorsed by Mr. Shiverdecker.

2 Do you recognize that check, sir?

3 A Yes, sir, I do.

4 Q Now, what did Mr. Katz tell you about
5 getting some money for you?

6 A He said that he was on his way to Florida
7 to see Pete. And the way he made it sound was that he had
8 planned to go down there anyway and that he would discuss
9 this with Pete and get back to me.

10 Q And did he get back to you?

11 A Yes, sir. He left a message on my recorder
12 and I subsequently called him back at the Florida phone
13 number he had left.

14 Q And did he subsequently get back to you?

15 A I called him and got a hold of him. And --

16

17 Q What did he tell you?

18 A He told me that he discussed this with
19 Pete. He said that there would be a check waiting for me
20 at another office, it wasn't his office, it was an
21 accounting office. And there would be a check waiting for
22 me. And he said that -- I started to talk to him a little
23 bit about, you know, what did Pete say about the gambling
24 and he said to me, "That's nothing we should discuss over
25 the phone." And he said, "There's nothing wrong with a

1 friend loaning a friend money." He says, "We can just make
2 it look like it's a loan."

3 And I didn't care how they made it look.
4 As long as I was getting my money back.

5 Q And that's the check you received?

6 A I went to the accounting office and picked
7 this check up.

8 Q Did Mr. Katz ask you to sign a note?

9 A No, sir.

10 Q Was it in fact a loan?

11 A No, sir.

12 Q It was the payment of money that Pete Rose
13 owed you?

14 A Yes, sir.

15 Q Let me show you three letters. One is
16 dated January 20th, 1989; the second is January 25th, 1989;
17 the third is March 2nd, 1989; and ask if you recognize
18 those?

19 Briefly tell us what the first letter is.

20 A The first letter was a letter that I sent
21 to Reuven Katz and a copy to my attorney Merlin
22 Shiverdecker in regards to the loan that I made to Pete
23 Rose and a brief description of events taking place since
24 that loan was made.

25 Q Did you sign that letter?

1 A Yes, sir.

2 Q Do you recognize your signature?

3 A Sure do.

4 Q Let's turn to the next letter. I'd ask you
5 if you recognize that.

6 A This letter here was sent to my attorney,
7 Merlin.

8 Q From who?

9 A From Robert Pitcairn. Who is one of
10 several lawyers that work in the law firm of Reuven Katz.

11 Q Okay. Do you see any reference to a
12 \$10,000 loan by Pete Rose to you in that letter?

13 A No, sir.

14 Q Let me show you the next letter. It
15 appears to be a letter from your attorney to Mr. Pitcairn.

16 A Yes, sir.

17 Q And it outlines the indebtedness of Pete
18 Rose to you?

19 A Yes, sir.

20 Q Is that correct?

21 A Yes, sir.

22 Q Do you know whether there's ever been any
23 response to this letter of March 2nd, 1989?

24 A No, sir.

25 Q Mr. Janszen, I think I've indicated to you

1 before that what we're engaged in is a very serious matter
2 and you understand the gravity of the matter?

3 A I certainly do.

4 Q And you understand the gravity of your
5 testimony concerning your placing bets on Cincinnati Reds'
6 baseball games for Pete Rose while he was Manager of the
7 Cincinnati Reds?

8 A Yes, sir.

9 Q And you understand that you're under oath?

10 A Yes, sir. I'd like to say something if I
11 might.

12 Q Go ahead.

13 A When I sat down with the prosecutor and the
14 FBI people and the IRS people back over a year ago, they
15 told me, "Paul, if you're going to cooperate and help, you
16 have to give one hundred percent, not 99, not 99 and a
17 half, one hundred percent."

18 And my attitude and my feelings about when
19 I said to them, yes, I will give you one hundred percent,
20 have not changed. Not with them; not with this
21 investigation; not with any investigation that might come
22 up.

23 Q And when you mean a hundred percent, you
24 mean the truth?

25 A I mean one hundred percent the truth.

1 MR. DOWD: Okay. I have no further
2 questions. Thank you.

3 (Whereupon, at 2:28 o'clock p.m., the
4 deposition was concluded.)


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C E R T I F I C A T E

1
2 STATE OF OHIO)
3 COUNTY OF HAMILTON) SS.

4 I, Gary L. Baldwin, the undersigned, a duly
5 qualified and commissioned Notary Public within and for the
6 State of Ohio, do hereby certify that before the giving of
7 his aforesaid deposition the said PAUL G. JANSZEN was by me
8 first duly sworn to depose the truth, the whole truth and
9 nothing but the truth; that the foregoing is the deposition
10 given at said time and place by the said PAUL G. JANSZEN;
11 that said deposition was taken by me in stenomask and
12 transcribed by me into typewriting; that I am neither
13 relative of nor attorney for any of the parties for this
14 cause, nor relative of nor employee for any of their
15 counsel and have no interest whatever in the result of this
16 action.

17 IN WITNESS WHEREOF, I hereunto set my hand
18 and official seal of office, at Cincinnati, Ohio, this 5th
19 day of April, 1989.

20 
21 _____
22 Gary L. Baldwin
23 Notary Public, State of Ohio

24 My Commission expires:
25 February 26, 1993