

Exhibit 15

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
06 CIV. 0589

-----x

ANUCHA BROWNE-SANDERS,
Plaintiff,

- against -

MADISON SQUARE GARDEN, L.P., ISIAH LORD
THOMAS III, AND JAMES DOLAN,
Defendants.

-----x

November 7, 2006
10:20 a.m.

VIDEOTAPE DEPOSITION of RUSTY
McCORMACK, taken by the Plaintiff,
pursuant to Notice, held at the offices of
Vladeck Waldman Elias & Engelhard, P.C.,
1501 Broadway, New York, New York, before
Debbie Zaromatidis, a Shorthand Reporter
and Notary Public of the State of New
York.

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1 McCORMACK
 2 A. Yes.
 3 Q. Okay.
 4 A. The whole project was his.
 5 Q. I think you said earlier in your
 6 testimony that Mr. Moran and Ms. Noel
 7 updated you about the progress of their
 8 investigation as it was ongoing?
 9 A. Yes.
 10 Q. What did they say to you about
 11 it?
 12 A. There wasn't a lot done until
 13 they completed, but the -- the feedback as
 14 the -- as it progressed was that they
 15 had -- they were not corroborating the
 16 allegations of Anucha.
 17 Q. Did they tell you that they were
 18 corroborating any of the allegations of
 19 Ms. Browne-Sanders?
 20 A. Well, that there was a -- as I
 21 remember, Dan Gladstone, for instance,
 22 said, yeah, Stephon did say that to him,
 23 and Isiah did say, yes, I put my arms
 24 around Anucha and tried to kiss her, but
 25 that was it that I remember anyhow.

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1 McCORMACK
 2 Q. They told you that while the
 3 investigations was ongoing?
 4 A. I think so. I -- or it may
 5 come -- come later. I -- the timing I
 6 don't know. It was either in a report or
 7 -- or prior to that.
 8 Q. Did you eventually receive a
 9 report reflecting the results of an
 10 investigation?
 11 A. Yes, I did.
 12 Q. Did you take any action in
 13 connection with that report?
 14 A. I did not.
 15 Q. Did you make any recommendations
 16 in connection with that report?
 17 A. I did not.
 18 Q. Did you have discussions with
 19 anyone --
 20 A. Immediately. We did write a
 21 report later, a memo later.
 22 Q. Well, my question was: Did you
 23 make any recommendations in connection
 24 with that -- the report that had been
 25 given to you by Mr. Moran and Ms. Noel?

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1 McCORMACK
 2 A. Yes.
 3 Q. What -- what recommendations did
 4 you make?
 5 A. I recommended that Isiah be
 6 given some sensitivity training, and that
 7 Steve meet to do a recap and lessons
 8 learned from the -- from the events.
 9 Q. Did you make any other
 10 recommendations?
 11 A. No.
 12 Q. Did you recommend that
 13 Ms. Browne-Sanders be terminated?
 14 A. No, I don't think it was a
 15 recommendation. It was -- it was a
 16 statement that -- that based upon her
 17 relationships both, you know, within the
 18 organization primarily but -- that she
 19 should be separated. I didn't say
 20 recommend.
 21 Q. Could you clarify for me the
 22 distinction that you are making? You said
 23 you said in your memo that she should be
 24 separated, but you didn't view that as a
 25 recommendation?

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1 McCORMACK
 2 A. It is up -- that is not my -- it
 3 is up to management then to decide how
 4 they do it. I -- I recommended in the
 5 case of -- of Isiah and Steve, but the
 6 organization then has to react to the
 7 Anucha thing.
 8 Q. Did you make a recommendation
 9 that Ms. Browne-Sanders should be
 10 separated?
 11 A. No.
 12 Q. Did you have -- did you make a
 13 statement in your report that
 14 Ms. Browne-Sanders should be separated?
 15 A. I did.
 16 Q. And could you clarify for me in
 17 your mind what is the distinction between
 18 a statement that she should be separated
 19 and a recommendation that she should be
 20 separated?
 21 A. There is not a lot, but it is
 22 not -- not a recommendation.
 23 Q. Are you --
 24 A. She obviously wasn't fitting in
 25 the organization, and by then she had

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1 McCORMACK
 2 pretty much decided her fate.
 3 Q. How -- are you able to explain
 4 at all what the difference is in your mind
 5 between a statement that she should be
 6 separated and a recommendation that she
 7 should be separated?
 8 A. It is close, but there is a
 9 difference. I -- I just didn't use the
 10 word recommend.
 11 Q. Is there any particular reason
 12 why you didn't use the word recommend?
 13 A. Because that is the way Mark
 14 Schoenfeld wrote it.
 15 Q. You did not write it -- you did
 16 not write your --
 17 A. That was drafted by Mark
 18 Schoenfeld.
 19 Q. When you say that, you are
 20 referring to the --
 21 A. That memo.
 22 Q. You've got to let me ask the
 23 questions.
 24 A. Sorry.
 25 Q. The -- the memo in which

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1 McCORMACK
 2 you -- you just described that you made
 3 recommendations with respect to Mr. Thomas
 4 and -- and Mr. Mills, that memo was
 5 drafted by Mr. Schoenfeld?
 6 A. Correct.
 7 Q. You just signed your name to it?
 8 A. No. I -- we -- I did some minor
 9 edits, but for the most part it was
 10 written by Mark Schoenfeld. The only
 11 thing I did was wordsmithing the memo.
 12 Q. How did you wordsmith it?
 13 A. I don't remember. It was minor
 14 edits.
 15 Q. Did you agree with all of the
 16 statements that were made in this
 17 memorandum that Mr. Schoenfeld drafted?
 18 A. Yes, I did.
 19 Q. Okay. And what was the basis
 20 for the conclusion that Mr. Thomas should
 21 be given I think you said sensitivity
 22 training?
 23 A. Well, he admitted that he had
 24 touched her and attempted to kiss her, and
 25 so -- our concern was that different

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1 McCORMACK
 2 people had different sensibilities, and we
 3 just thought for the sake of the
 4 organization, et cetera, we -- we would
 5 give him some training to sensitize him to
 6 that. It would be one-on-one.
 7 Q. Was it -- and then that in your
 8 judgment was based solely on the
 9 determination that he had hugged
 10 Ms. Browne-Sanders and attempted to kiss
 11 her? Was it based on any other facts?
 12 A. No, that was -- that was the
 13 primary -- because that is all we knew
 14 that had really taken place.
 15 Q. Did you know whether or not Mr.
 16 Brown -- Mr. Thomas had used profanity in
 17 the workplace?
 18 A. The investigation did not
 19 corroborate that.
 20 Q. No. That -- it did not
 21 corroborate that he used profanity?
 22 A. Correct.
 23 Q. And what was the basis of the
 24 recommendation with respect to Steve
 25 Mills?

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1 McCORMACK
 2 A. With Steve, you know, we thought
 3 that -- that if he sits down and -- we
 4 thought let him sit down with some
 5 HR -- by the way Frank Lavotic and Rob
 6 Dotien are both -- Frank is a senior vice
 7 president for cable operations in charge
 8 of human resources, which is a big chunk
 9 of our company. Rob Dotien is a
 10 corporate -- he might be SVP now too I
 11 think, but I am not really sure. Anyway,
 12 they are HR professionals, and we thought
 13 let's -- let Steve sit down with somebody
 14 who has not been involved with this thing
 15 and do sort of a post mortem lessons
 16 learned sort of exercise.
 17 Q. Your recommendation was that
 18 Mr. Mills should sit down with Mr. Dotien
 19 and Mr. Lavotic?
 20 A. Right.
 21 Q. Did you think that there was any
 22 lessons that Mr. Mills needed to learn as
 23 a result of this investigation?
 24 A. We didn't know. That is why we
 25 wanted somebody who had not been involved,

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1 McCORMACK
 2 you know, who -- who was really separate
 3 from the organization to take a look at
 4 it.
 5 Q. Did that meeting happen to your
 6 knowledge?
 7 A. I don't think it did.
 8 Q. Do you know why it -- it didn't?
 9 A. No, I don't know that.
 10 Q. Do you know whether --
 11 A. Just -- you know, I think the
 12 lawsuit came and -- and we just
 13 didn't -- we didn't follow-up on it.
 14 Q. And did Mr. Thomas receive the
 15 sensitivity training that you referred to?
 16 A. No.
 17 Q. And do you know why he did not?
 18 A. Because the -- when the lawsuit
 19 came that -- that was about as much
 20 sensitivity training as he -- he would
 21 ever want.
 22 Q. What do you mean by that?
 23 A. Well, he had been accused of
 24 some serious things, and he obviously I
 25 don't think would -- would do anything,

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1 McCORMACK
 2 even the hug and kiss ever again.
 3 MR. MINTZER: Why don't we take
 4 a five-minute break.
 5 THE VIDEOGRAPHER: Okay. The
 6 time is 3:47 p.m., November 7, 2006. This
 7 is the end of tape number 3 of the
 8 videotape deposition of Rusty McCormack.
 9 (Recess taken.)
 10 THE VIDEOGRAPHER: Okay. The
 11 time is 3:59 p.m., November 7, 2006. This
 12 is tape number 4 of the videotape
 13 deposition of Rusty McCormack.
 14 BY MR. MINTZER:
 15 Q. Mr. McCormack, before the break
 16 you had mentioned a -- a memo that Mr.
 17 Schoenfeld had drafted that you signed.
 18 Do you recall that?
 19 A. Yes.
 20 Q. And that there was a statement
 21 in that memorandum that said that
 22 Ms. Browne-Sanders should be separated
 23 from MSG, correct?
 24 A. Correct.
 25 Q. Had you had any discussions with

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1 McCORMACK
 2 anyone else at MSG other than Mr.
 3 Schoenfeld about that statement?
 4 A. No, I had not.
 5 Q. Had you discussed the
 6 possibility of Ms. Browne-Sanders being
 7 separated with anyone else at MSG at the
 8 time that you signed that memorandum?
 9 A. No.
 10 Q. At any point, did you have any
 11 discussion with Steve Mills about
 12 separating Ms. Browne-Sanders from MSG?
 13 A. No.
 14 Q. Did you have any conversation
 15 with James Dolan about separating
 16 Ms. Browne-Sanders from MSG?
 17 A. No, I did not.
 18 Q. And did you have any
 19 conversations with Hank Ratner about
 20 separating Ms. Browne-Sanders from MSG?
 21 A. No, I did not.
 22 Q. Is it fair to say the only
 23 person you spoke to about that was Mr.
 24 Schoenfeld?
 25 A. I believe that is correct.

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1 McCORMACK
 2 Q. What is -- what was the
 3 substance of your conversation with Mr.
 4 Schoenfeld about separating
 5 Ms. Browne-Sanders from MSG?
 6 A. Well, we --
 7 MR. GREEN: I instruct the
 8 witness not to answer. Privileged
 9 communication.
 10 MR. MINTZER: You are taking
 11 the position that that is privileged?
 12 MR. GREEN: Yes, I am not
 13 taking the position that the letter itself
 14 is privileged, but the underlying
 15 conversations which would be advice sought
 16 or rendered would be privileged.
 17 Q. Are you aware -- were there any
 18 drafts of the memorandum that you signed
 19 that was authored by Mr. Schoenfeld?
 20 MR. GREEN: Same objection.
 21 All communications between Mr. McCormack
 22 and Mr. Schoenfeld would be privileged
 23 except for the version of the document
 24 that is in evidence as to which no
 25 privilege has been asserted.

<p style="text-align: right;">250</p> <p>1 McCORMACK 2 corroborate the allegations. 3 Q. This report was -- was addressed 4 to you, correct? 5 A. That's correct. 6 Q. Why didn't you think it was 7 significant to focus on it? 8 A. It was done by the two 9 professionals in this area, and it was 10 done for management review at that point. 11 Q. But based on this report, you 12 made a statement in a -- in a memorandum 13 that said Ms. Browne-Sanders should be 14 fired. Isn't that -- isn't that true? 15 MR. GREEN: Objection. That's 16 not the prior testimony. 17 Q. Mr. -- you can answer. 18 A. No, nothing based on this report 19 was that. 20 Q. Isn't it -- 21 A. She had -- she had -- she had a 22 lot of troubles by then, and it -- but it 23 was relationship issues. It was 24 communication issues. She had already 25 told Steve Mills that she could no longer</p>	<p style="text-align: right;">253</p> <p>1 McCORMACK 2 statement in a document that -- saying 3 that Ms. Browne-Sanders should be fired 4 was after you had reviewed this report 5 marked McCormack Deposition Exhibit 7, 6 correct? 7 MR. GREEN: Objection to form. 8 A. That's correct, but it had 9 nothing to do with the report. 10 Q. Based on this report, you made 11 recommendations concerning Mr. Thomas and 12 Mr. Mills; is that -- is that true? 13 A. That is correct. 14 Q. Didn't you think it was 15 important to read it carefully before you 16 made recommendations concerning these 17 gentlemen? 18 A. No, I -- I read through it, 19 but -- but again the recommendation was 20 coming from -- from legal also. 21 Q. Your testimony you just -- just 22 a couple of minutes ago was that you 23 didn't focus on this -- on some of the 24 words used in this report? 25 A. At the time I didn't focus on it</p>
<p style="text-align: right;">251</p> <p>1 McCORMACK 2 work there and please help her while she 3 works for employment but nothing based 4 upon this. 5 Q. You only made a statement in a 6 document that Ms. Browne-Sanders should be 7 fired after reviewing this report; isn't 8 that a fact? 9 MR. GREEN: Objection to form. 10 You may answer, Mr. McCormack. 11 A. Okay. Yes. 12 MR. MINTZER: Could you -- 13 could you read the question back. I may 14 have -- 15 A. Yes, but it had nothing do with 16 this report. 17 Q. There is no question pending. I 18 am going to ask for it to be read back. 19 (Record read.) 20 MR. GREEN: I objected to that, 21 and you can answer the question. 22 Q. Okay. And you can answer the 23 question. 24 A. I had reviewed the report. 25 Q. The only time that you made a</p>	<p style="text-align: right;">253</p> <p>1 McCORMACK 2 all that much. I read it, but I didn't 3 know where it was -- where it was headed. 4 Q. And even though you were going 5 to make recommendations on the -- related 6 to the careers of Mr. Thomas and Mr. 7 Mills based on the report, you didn't 8 focus on what was written in the report. 9 Is that -- is that an accurate statement? 10 A. No. As I said I read it, but 11 I -- to the minute detail, I did not. 12 That -- John and Rochelle were the two 13 experts in this area, and I -- and I think 14 legal corroborated them on the -- further 15 writing of the memo. 16 Q. You think legal corroborated 17 with Mr. Moran and Ms. Noel about the 18 writing of McCormack 7? 19 A. I am sorry. Ask again. 20 Q. Did legal corroborate with Mr. 21 Moran and Ms. Noel about the writing of 22 McCormack 7? 23 A. I think so, but you'll have to 24 ask them. I don't -- I'm not sure. 25 MR. MINTZER: McCormack 8,</p>

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1 McCORMACK
 2 please.
 3 (McCormack Exhibit 8 marked for
 4 identification.)
 5 (Document handed to witness.)
 6 MR. MINTZER: For the record,
 7 McCormack 8 is a two-page document that's
 8 Bates stamped MSG 6363 and 6364.
 9 (Pause.)
 10 Q. Have you had a chance to review
 11 McCormack 8?
 12 MR. GREEN: Take a moment, if
 13 you need it, to read it please, Mr.
 14 McCormack.
 15 (Pause.)
 16 A. Okay.
 17 Q. Is this the memorandum that you
 18 referred to earlier in your testimony that
 19 was drafted by Mr. Schoenfeld --
 20 A. Correct.
 21 Q. -- that you signed?
 22 A. That's correct. Yes.
 23 Q. Okay. The top line says that
 24 it's to files. Do you see that?
 25 A. Yes.

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1 McCORMACK
 2 Q. What does that refer to?
 3 A. It's a memorandum -- a
 4 memorandum to file, which -- which then
 5 goes into the employee relations files.
 6 Q. Was this a memorandum that was
 7 intended to be read by any particular
 8 person?
 9 A. Not necessarily. It was really
 10 written because at that point we -- we
 11 assumed we probably were going to be sued.
 12 So this was just to be on the record.
 13 Q. So this was a document that was
 14 created in contemplation of litigation?
 15 A. That's correct.
 16 Q. In the document, you made
 17 certain recommendations, as you said
 18 before, concerning Isiah Thomas and Mr.
 19 Mills, right?
 20 A. Um hum.
 21 Q. Yes?
 22 A. Yes. Yes.
 23 Q. Who were you directing those
 24 recommendations to?
 25 A. In the case of Isiah,

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1 McCORMACK
 2 it's -- obviously that's Steve Mills'
 3 decision as to whether he would do that or
 4 not.
 5 Q. And what about with respect to
 6 Mr. Mills?
 7 A. That would be Jim Dolan's
 8 decision.
 9 Q. Okay. And so did you
 10 contemplate that both Steve Mills and Mr.
 11 Dolan were going to read this memorandum?
 12 A. I don't remember contemplating
 13 it at the time.
 14 Q. Well, did you intend it, this
 15 memorandum, to be read by Mr. Mills and
 16 Mr. Dolan?
 17 A. No, not necessarily. It was
 18 up -- you know, I really was pretty much
 19 taking directions from the legal
 20 department.
 21 Q. And the statements that you made
 22 concerning Ms. Browne-Sanders, did you
 23 intend them to be read by anyone?
 24 A. Not necessarily.
 25 Q. I think you -- you testified

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1 McCORMACK
 2 before that you had had no discussion with
 3 anyone other than Mr. Schoenfeld about the
 4 statements you've made concerning
 5 Ms. Browne-Sanders in this memo?
 6 A. I'm sure I discussed it with
 7 John Moran at the time.
 8 Q. You discussed the content --
 9 A. Yes.
 10 Q. -- of the paragraph relating to
 11 Ms. Browne-Sanders --
 12 A. Well, these --
 13 Q. Hold on. Hold on.
 14 A. I'm sorry.
 15 Q. Let me finish my question, sir.
 16 You discussed the content of the
 17 paragraph related to Ms. Browne-Sanders
 18 with Mr. Moran?
 19 A. That's correct.
 20 Q. When did you do that?
 21 A. Well, I showed him the
 22 memorandum.
 23 Q. You showed him this entire
 24 memorandum?
 25 A. Yes, I did.

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1 McCORMACK
 2 Q. When did you do that?
 3 A. I showed to him -- actually I
 4 might have showed it to him before I
 5 signed it. I can't remember.
 6 Q. So sometime shortly -- either
 7 shortly before you signed it or shortly
 8 after you signed it?
 9 A. Yes.
 10 Q. The memorandum is dated January
 11 19, 2006. Do you see that?
 12 A. Um hum. Yes.
 13 Q. You've already said that you
 14 didn't draft it. Mr. Schoenfeld drafted
 15 it. When did you first see a draft of
 16 this?
 17 A. Maybe a couple of days prior to
 18 that at most.
 19 Q. You wrote in the first paragraph
 20 that you have reviewed the report of the
 21 investigation conducted by Rochelle Noel
 22 and John Moran regarding the allegations
 23 recently made by Anucha Browne-Sanders and
 24 her counsel. "In light of that report, I
 25 am making certain recommendations."

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1 McCORMACK
 2 What did you mean by that
 3 sentence, "in light of that report I am
 4 making certain recommendations"?
 5 A. Well, we -- we -- based upon
 6 again the -- the difficulty that Anucha
 7 was having, the interpersonal problems
 8 that she was having, her expressed desire
 9 to leave the company, and all of the
 10 things that we have discussed today in
 11 terms of things like the open practice
 12 fiasco where somebody could have been
 13 hurt, in view of things that I personally
 14 was involved with, you know, we -- we -- I
 15 did not disagree that she should probably
 16 leave the company or should leave the
 17 company. She just had poor relationships,
 18 and she had already lost the confidence of
 19 the -- certainly the vice chairman of the
 20 company with the budget fiasco.
 21 With Isiah we said, again we
 22 need to sensitize him. We should -- you
 23 know, different people have different
 24 sensitivities. Is he aware of that? He
 25 hasn't worked in a large public company,

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1 McCORMACK
 2 and you -- believe me having been a
 3 private company for some time and may be
 4 going to be private again, but
 5 it -- the -- particularly today with the
 6 SEC and regulations, that he
 7 wouldn't -- he probably wouldn't know
 8 that, so we wanted to sensitize him, so
 9 that he could -- he would -- and with
 10 Steve, as I said, we -- we recommended
 11 that he meet with two people who had not
 12 been involved with this issue and -- but
 13 who are professionals and do follow-up.
 14 Q. When you say though "in light of
 15 the report," what did the report have to
 16 do with the recommendations that you were
 17 making --
 18 A. They --
 19 Q. -- with respect to
 20 Ms. Browne-Sanders?
 21 A. They -- it did not have anything
 22 do with it.
 23 Q. So where you wrote "in light of
 24 that report I am making certain
 25 recommendations," you didn't really mean

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1 McCORMACK
 2 that with respect to the recommendations
 3 for Ms. Browne-Sanders?
 4 A. No, the -- again, Mark
 5 Schoenfeld wrote this, but -- but
 6 we -- the -- the action taken with Anucha
 7 was done by Jim Dolan.
 8 Q. How do you know that?
 9 A. Okay. So -- well, that's the
 10 word I got.
 11 Q. The word you got from whom?
 12 A. That I'm not sure. I don't know
 13 whether it was Steve. I don't know
 14 whether it was -- I don't remember that
 15 exactly.
 16 Q. Someone had decided --
 17 A. But Jim Dolan decided to -- that
 18 he was going to fire Anucha.
 19 Q. Someone -- someone told you that
 20 that Jim Dolan said that
 21 Ms. Browne-Sanders was going to be
 22 separated?
 23 A. That's correct.
 24 Q. Great. And then you had heard
 25 that before you made this -- you signed

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1 McCORMACK
 2 your name to this document, McCormack 8?
 3 A. Yes.
 4 Q. So it's fair to say that you
 5 learned about Mr. Dolan's decision, and
 6 then you and Mr. Schoenfeld drafted a
 7 memorandum that would conform to Mr.
 8 Dolan's decision?
 9 MR. GREEN: Objection to form.
 10 Q. Is that accurate?
 11 A. We -- yeah, we did write
 12 this -- we did write this with that, yes,
 13 but the decision was him. You have speak
 14 to Jim.
 15 Q. Did you hear about
 16 Ms. Browne-Sanders' supposed desire to
 17 leave the company from anyone other than
 18 Steve Mills?
 19 A. No, I don't believe so.
 20 Q. No, you didn't hear about it
 21 from anyone other than Steve Mills?
 22 A. That's correct. Steve came to
 23 me to discuss the possibility of her
 24 continued employment while she looked for
 25 work.

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1 McCORMACK
 2 Q. And -- and when did that happen?
 3 A. It was after she came to him,
 4 which was in late November I think.
 5 Q. Your -- your memorandum says in
 6 the second line "However, based on
 7 comments Browne-Sanders made to Steve
 8 Mills and members of her department before
 9 making the -- her complaint, it is clear
 10 that Browne-Sanders has a poor
 11 relationship and difficulty interacting
 12 with Mills and other members of MSG
 13 management."
 14 Do you see that sentence?
 15 A. Yes.
 16 Q. What were the comments that
 17 Ms. Browne-Sanders had made to other
 18 members of her department that was the
 19 basis of that statement?
 20 A. She -- I had heard that
 21 she -- she made some statements to other
 22 members. I don't know exactly who that
 23 was, but I -- I -- that's what I
 24 understood. That was -- that was the talk
 25 around in the -- in the -- that

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1 McCORMACK
 2 specifically, and Steve Mills of course
 3 was the fact that she wanted to leave the
 4 company.
 5 Q. Right. But the statements that
 6 were supposedly made to members of her
 7 department, those were not statements you
 8 heard firsthand?
 9 A. I can't remember who exactly it
 10 was, but I may -- I may have been told. I
 11 can't remember.
 12 Q. You may have been told. You may
 13 not have been told. Is that a fair -- is
 14 that accurate?
 15 A. Well, I probably was told
 16 because that was the scuttlebutt in the
 17 company is she was having -- she was
 18 having conversation, and -- and the fact
 19 that she was unhappy and probably was
 20 going to leave the company.
 21 Q. So that part of your -- your
 22 statement with respect to
 23 Ms. Browne-Sanders' future at the company
 24 was based on scuttlebutt?
 25 A. Yes.

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1 McCORMACK
 2 MR. GREEN: Objection to form.
 3 Q. Who are the other members of MSG
 4 management that are referred to in that
 5 sentence?
 6 A. Well, I mentioned to you I am
 7 one of them and Fran Hurley, my vice
 8 president of training and development, is
 9 another one. Tim Hassett, Joe DeCoco, who
 10 was in charge of security. Of course,
 11 Hank Ratner, who is -- you know with
 12 budget issues and the fact that -- that he
 13 had said that she was probably over her
 14 head, and there were other people.
 15 Specifically I don't know. I can't name
 16 them all, but I -- I had heard again talk
 17 around the company that Anucha was just
 18 over her head.
 19 Q. Did you -- did you personally
 20 have any difficulty interacting with
 21 Ms. Browne-Sanders?
 22 A. No, I didn't, but I didn't -- I
 23 didn't have to.
 24 Q. Okay.
 25 A. I didn't have a real business

Exhibit 16

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1 MORAN
 2 now four or five times, and the witness
 3 has answered.
 4 MR. MINTZER: No, I'm asking
 5 about what he has written here because
 6 there seems to be some confusion.
 7 MR. GREEN: That's --
 8 Q. I am asking him -- Mr. Moran,
 9 Mr. Thomas did say according to your note
 10 that he would have done something if she
 11 said that Mr. Murphy was inappropriate?
 12 MR. GREEN: Objection to form.
 13 I will instruct him not to answer further.
 14 He already answered the question.
 15 MR. MINTZER: Could you mark it
 16 for a ruling.
 17 Q. Can I ask you to look at the
 18 last page, 13204?
 19 A. Yes.
 20 Q. Could you read from the top,
 21 please?
 22 A. "Do you understand Anucha could
 23 feel her position was being usurped? No,
 24 Jeff Nix and Anucha had close relationship
 25 and Jeff ran everything, and Anucha was

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1 MORAN
 2 his right hand. I kept Jeff as assistant
 3 GM. I asked Steve what her duties were.
 4 I think she liked being in basketball
 5 ops" -- "op and making decisions rather
 6 than running her own department. I wanted
 7 changes but not out of dislike."
 8 You want me to keep reading?
 9 Q. No.
 10 A. Okay.
 11 Q. Had you asked Mr. Thomas
 12 anything about Jeff Nix?
 13 A. No, I don't believe we did.
 14 Q. Do you know what the basis was
 15 for Mr. Thomas' statement that Mr. Nix and
 16 Ms. Browne-Sanders had a close
 17 relationship?
 18 A. Well, I -- I think he is -- he
 19 is trying to -- he is drawing the -- the
 20 picture that Jeff Nix and Anucha had a
 21 close working relationship, and he allowed
 22 her to do a lot of things in basketball --
 23 outside of her -- her defined
 24 responsibilities into the basketball ops
 25 world. When -- when Isiah came in, he

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1 MORAN
 2 was saying, hey, this is basketball ops.
 3 This was marketing and let's not intermix.
 4 Q. My -- my question, Mr. Moran,
 5 was did Mr. Thomas say what the basis of
 6 his knowledge was about Mr. -- Mr. Nix's
 7 relationship with Ms. Browne-Sanders?
 8 A. No.
 9 (Moran Exhibit 11 marked for
 10 identification.)
 11 (Document handed to witness.)
 12 A. I should start reading it?
 13 Q. Yes.
 14 (Pause.)
 15 A. Okay.
 16 Q. Can I ask you to look at 13187,
 17 please.
 18 A. Yes.
 19 Q. The third paragraph on that
 20 page.
 21 A. Okay.
 22 Q. Can you read that?
 23 A. "If players committed to it. We
 24 did it. I don't think there was a time we
 25 didn't work or tried to accomodate. If

301

1 MORAN
 2 not, we gave a rational reason."
 3 Q. Do you recall what Mr. Thomas
 4 said in that -- in that connection?
 5 A. I think it was in conjunction
 6 with making players available. So we --
 7 he is saying, you know -- you know, I am
 8 not sure there wasn't a time they didn't
 9 do it, but if they didn't, they had a good
 10 reason for it. They tried to accomodate,
 11 but if they weren't able to they gave a
 12 rationale -- a rational reason.
 13 Q. Could I ask you to look at the
 14 bottom of the page, please.
 15 A. "Don't recall Steve coming to me
 16 about player availability."
 17 Q. Did Mr. Thomas say that Mr.
 18 Mills had never raised the issue of player
 19 availability with him?
 20 MR. GREEN: Objection to form.
 21 A. Well, we followed that up. I
 22 think it answers in here. We told him,
 23 well, did he ever come to you with
 24 concerns, and -- and then he said well,
 25 yeah, you -- he said you and Anucha need

306

1 MORAN
 2 You may answer, Mr. Moran.
 3 A. He didn't elaborate over what
 4 period of time it was, but that's
 5 certainly possible.
 6 Q. Well, I -- he didn't -- he
 7 didn't expressly say that, but that was
 8 your understanding that he was referring
 9 to the entire period that they worked
 10 together?
 11 MR. GREEN: Objection to form,
 12 but you may answer.
 13 A. I really don't know.
 14 Q. Could you read the paragraph
 15 right below that please, the four or five
 16 times?
 17 A. "She tried to set up weekly
 18 meeting. I told her that I won't be
 19 meeting with you. Whatever you need we
 20 will deliver, and [REDACTED] will work with
 21 you. We will fulfill our obligations."
 22 And that was -- I believe that was
 23 the -- you know, I shouldn't speculate.
 24 I'm not sure what that was.
 25 Q. Can I ask you to look at the

307

1 MORAN
 2 next page, 13189?
 3 A. Yes.
 4 Q. Could you read the top
 5 paragraph?
 6 A. A lot of people -- I'm not sure
 7 what that word is.
 8 Q. Complain.
 9 MS. HORWITZ: Comment.
 10 A. Yeah. I think it is comment to
 11 me. "A lot of people commented to me they
 12 have problems with [REDACTED]. One reason he
 13 is not here."
 14 Q. Did he say what the -- what the
 15 problems that people had with [REDACTED] were?
 16 A. No, he didn't.
 17 Q. Can I --
 18 A. At that point [REDACTED] was gone,
 19 so --
 20 Q. Can I direct your attention to
 21 the middle of the page. It says "see
 22 [REDACTED] as" -- do you see that?
 23 A. Um hum.
 24 Q. Could you read that sentence?
 25 A. "See [REDACTED] as a liability. No,

308

1 MORAN
 2 I love [REDACTED] Hurt me when he had to go."
 3 Q. Had you or Ms. Noel asked
 4 whether --
 5 A. Yes, I --
 6 Q. He is -- let me just finish the
 7 question.
 8 Had you and Ms. Noel asked
 9 whether Mr. Thomas had seen Mr. [REDACTED] as
 10 a liability?
 11 A. Yes, I believe so.
 12 Q. And Mr. Thomas said he did not?
 13 A. Correct.
 14 Q. Do you know the circumstances of
 15 Mr. [REDACTED] separation?
 16 A. Actually I don't.
 17 Q. Were you -- you weren't involved
 18 with that?
 19 A. No.
 20 Q. Do you know whether it was
 21 voluntary or involuntary?
 22 A. I know he took a retirement, but
 23 I think it was involuntary.
 24 Q. And what's the basis for your
 25 belief?

309

1 MORAN
 2 MR. GREEN: Objection to form.
 3 A. He received a severance.
 4 Q. Because he received a severance
 5 you think it was involuntary?
 6 MR. GREEN: Objection to form.
 7 A. Yes.
 8 Q. Can I ask you to read the bottom
 9 paragraph on 13189?
 10 A. "Ever hear from Steve that [REDACTED]
 11 was abusing" -- "abusive or hostile --
 12 hostile. No, just you know how [REDACTED] is.
 13 I never saw [REDACTED] be abusive or hostile in
 14 my presence. Could" --
 15 something -- "could be dismissive or short
 16 or make you feel he didn't get it if he
 17 didn't agree with you." I think that was
 18 all -- all being said by Isaiah.
 19 Q. Did -- when Mr. Thomas said "no,
 20 just you know how [REDACTED]," did you know
 21 what he was talking about?
 22 A. No, I really didn't.
 23 Q. Did you ask him what he meant by
 24 that?
 25 A. No, I didn't. He actually

310

1 MORAN
 2 said -- he went on and said, you know, he
 3 could be dismissive or short or make you
 4 feel you didn't get it. That was sort
 5 of -- I think he was elaborating there.
 6 Q. Could you look at the page
 7 13191?
 8 A. Yes.
 9 Q. Could you start reading from the
 10 top, please.
 11 A. "March 22, 2004. Prior to 3/23
 12 meeting with Steve said what the fuck."
 13 Excuse me. "If do you these things, what
 14 am I here for. I wasn't clear as to what
 15 she did. She was acting as if she was my
 16 boss. I wanted clarification. Hired as
 17 president at basketball op. Where I came
 18 from that included everything. I asked
 19 her what she did. Getting people into
 20 building, ushers, security, profits and
 21 loss, referees, players, getting to be"
 22 something "other talent." On -- "getting
 23 to be on air talent. On court production.
 24 All that goes around the game she does. I
 25 replied what am I here for? If you do all

312

1 MORAN
 2 A. "On court production" meaning
 3 stuff that takes place at the half time or
 4 time outs.
 5 Q. So was -- was Mr. Thomas saying
 6 that Ms. Browne-Sanders had told him that
 7 she was responsible for basketball
 8 matters?
 9 MR. GREEN: Objection to form.
 10 You may answer, Mr. Moran.
 11 A. Well, I don't -- I wouldn't
 12 categorize it as basketball matters but
 13 those things that -- that he ticked off,
 14 yes.
 15 Q. Did he say that he called his
 16 wife?
 17 A. Yeah. "Called wife. I have a
 18 problem here. Explained to her what was
 19 going on. Called Steve and said we had to
 20 meet."
 21 Q. So Mr. Thomas told you that
 22 after his conversation with
 23 Ms. Browne-Sanders he called his wife?
 24 A. Right. Correct.
 25 Q. And then he called Ms. -- Mr.

311

1 MORAN
 2 of that, what do I do" -- "what do I did?
 3 I said what did I do? What did I do. You
 4 may" --
 5 Q. Okay.
 6 A. "You may -- she replied you make
 7 trades, and he said we need to -- to meet
 8 with Steve to clarify what I am here for."
 9 Q. Okay. That's fine.
 10 A. All right.
 11 Q. Did -- Mr. Thomas was saying
 12 that Ms. Browne-Sanders told him that she
 13 was responsible for -- for on court
 14 basketball matters?
 15 A. "Ask her what she did. Getting
 16 people into building, ushers, security,
 17 profit and loss, referees." And I am
 18 sorry the question was?
 19 Q. Players. My question was --
 20 A. Players, getting players. Oh,
 21 "players getting to be with on air
 22 talent." Meaning setting up interviews I
 23 think and promotions.
 24 Q. And then what -- I am sorry, and
 25 then something on court?

313

1 MORAN
 2 Mills?
 3 A. Right.
 4 Q. Can I ask you to look at 13193?
 5 A. Okay.
 6 Q. Beginning with "recounted
 7 Stephon's."
 8 A. Okay.
 9 Q. Could you read that, please?
 10 A. Read that. "Recounted Stephon's
 11 first name an incident over getting into
 12 green room. I told her that it was a big
 13 mistake since we have no policy. Should
 14 let go. She took a hard stance and that
 15 set her off on a bad relationship with
 16 him." Then Rochelle outlined what
 17 Anucha's position on that was, and Isiah
 18 said -- on the above. So Rochelle
 19 outlined what Anucha said to us. He said
 20 "Well she came to me. I said for right
 21 now let's go with it. I don't know who is
 22 important to him. He does recall saying
 23 earlier about only family, but on that
 24 night I made it -- I made a game -- on
 25 that night I made a game call. I made a

314

1 MORAN
 2 game call and told her to adjust to it
 3 also. Big deal about him coming back
 4 home. Bend until we know who was family,
 5 friends, et cetera."
 6 Q. The -- when you are reading this
 7 near the top, there is a reference to
 8 green room. Do you see that?
 9 A. Recount -- yes. I am sorry.
 10 Yes.
 11 Q. What is the green room?
 12 A. The green room is where players'
 13 family can hang out and have some privacy.
 14 It is a private room.
 15 Q. Okay. Does this refresh your
 16 recollection -- I think you testified
 17 earlier in the deposition that you believe
 18 that this issue with the credentialing had
 19 to do with seating one of Mr. Marbury's
 20 family members?
 21 A. Yeah. I -- I thought it was
 22 seating. It could have been seating in
 23 the green room. I am not sure.
 24 Q. Did Mr. Thomas say there was any
 25 issue about seating?

315

1 MORAN
 2 A. I -- I didn't hear it, no.
 3 Q. Can I you ask to you look at the
 4 next page 13194.
 5 A. Okay.
 6 Q. Could you read the top of the
 7 page?
 8 A. Other player -- other players
 9 complained. Just guys over -- just guys
 10 overweight. Also Sweetney not playing
 11 hard or having" -- or having -- or having
 12 heart -- or having -- I think it is heart.
 13 He -- he did -- "he did speak to her about
 14 this" -- "he didn't speak to her about
 15 this or to Steve. Happened on someone
 16 else's watch. Jeff and Anucha did the
 17 heavy lifting under Scott."
 18 Q. Do you know what the reference
 19 in the beginning paragraph "other players
 20 complaining had do with"?
 21 A. Yeah. This was a problem. The
 22 -- when he says heavy lifting under Scott,
 23 he -- Isiah replaced Scott, and the other
 24 players -- she supposedly went to Sweetney
 25 one night and said to him you are

316

1 MORAN
 2 overweight, and he -- I guess he was
 3 offended by that and something about you
 4 are not playing hard or have -- have
 5 heart. And the way I understand it he was
 6 quite offended, and he was like she is not
 7 in basketball ops. Why is she telling me
 8 to lose weight, et cetera.
 9 Q. Was that an issue you raised
 10 with Mr. Thomas or did he raise it in this
 11 interview?
 12 A. I -- I believe he did.
 13 Q. So he raised the issue that he
 14 had heard prior to his arrival at MSG that
 15 Ms. Browne-Sanders had made comments to a
 16 player named Sweetney?
 17 A. Right. Georgetown I believe.
 18 Q. Did he say -- did Mr. Thomas say
 19 what the basis of his knowledge about this
 20 was?
 21 A. No, he didn't.
 22 Q. Did he say whether
 23 Ms. Browne-Sanders had made similar
 24 comments to a player by the name of
 25 Weatherspoon?

317

1 MORAN
 2 A. He -- he didn't hear. I -- I've
 3 heard something about that, but he didn't
 4 hear about it. No.
 5 Q. Had you heard about this issue
 6 with Sweetney before?
 7 A. I had, but I -- I don't know
 8 where I heard it from.
 9 Q. You had heard that
 10 Ms. -- Ms. Browne-Sanders had said
 11 something to Mr. Sweetney?
 12 A. Yes.
 13 Q. Do you recall what?
 14 A. Something similar, but I don't
 15 recall who I heard it from. I -- actually
 16 it might have been Frank Murphy, but I
 17 don't know.
 18 Q. And did you hear that
 19 Ms. Browne-Sanders had said something to
 20 Clarence Weatherspoon?
 21 A. I'm not sure.
 22 Q. In the middle of that page, Mr.
 23 Thomas, did he say I am so disappointed
 24 that he took shit for -- is that hiring?
 25 A. Yes.

ESIAH

ESIAH - Does ANUCHA HAVE A REPERTINE
RELATIONSHIP TO XU?

- REVIEW ORG. CHARTS

- REVIEW 3/23/04 MEETING WITH STALE

- REVIEW WHAT HE HAS TOLD THE TEAM ABOUT
ANUCHA'S ROLE

- OCT 4 / PETRA / REFEREES

[DEC 30, 04 / I AM IN LOVE WITH XU
3/14/05

REVIEW FRANK MURPHY

6:30 ESIAH

3/23/2004 / COMPLAINED ABOUT FRANK
MURPHY - DIDN'T HEAR BITCH PART

- WHEN I GOT HERE THOSE 2 WERE AT ODDS

- THEY COMPLAINED ABOUT EACH OTHER

- IT SOUNDS FAMILIAR THAT PART WITHOUT
BITCH

- ANUCHA & JEFF KALIX WERE MIXED

- SHE AND I BUTTED HEADS / I WANTED
COMPLETE CONTROL OF PLATING TIME &
REPAIRS BULLIES

FRANK WOULD LET GO BUT NOT
PROFANEITY OR DISRESPECTFUL



SHE THOUGHT I WAS BEING PERSONAL
WITH HER - PERSONALLY ~~THAT~~ DON'T
THIS BECAUSE I DIDN'T LIKE HER
WAS THE IMPRESSION SHE LEFT

IN LOSING STRESS & COMMITMENT
TO SPONSORS COULD BE HONORED BY
OTHER PLAYERS

MAKE A SCHEDULE SO I WILL KNOW
TIMES & DATES

SHE COMPLAINS TO THE ABOUT FRANK
CONSIDER HER NAME'S - kb

WHATEVER MARCHA WANTS, LET'S
DELIVER IT OR FIND SOMETHING
ELSE WE CAN DO?

3/23/07 - ASKED ABOUT ISHAK COULD HER
NAME'S - NO, I DID NOT DO THAT,
EVEN THOUGH I HAVE THE TIME
MATERIAL. I GOT SUGAR BUT
WANTED TO DO THAT

3/23/04 met with Steve to clarify
Rous - He recalls the meeting.
He was involved in Basketball
operations when he arrived.
We used Platten's energy & time
on the CT, more than in the corner
but will make sure Platten's honor
these commitments

- [Steve left meeting to take a call
- [Doesn't recall this
- [Don't recall being a hostile meeting
- [Thought a good meeting
- [Positive didn't turn into a grayer person if he left room

Late 2003 or early 2004 - told Platten
to focus on Basketball & Hot Corner
relations - to some degree, but
we still fulfilled our commitments.
After Penn trip we can't have
appreciable

Frank and Anthony put schedules together

/ ALSO SCHEDULE FOR ISRAEL
QUICKS BOWL SCHEDULED PRIOR TO A GAME
HAD PROBLEM WITH THAT

AT END OF SEASON WE PUT A
SCHEDULE TOGETHER & HAVE NOT HAD THE
SAME ISSUES

- I HAVE VERY LITTLE CONVERSATION OR
INTERACTION WITH ANICHA

- MOST IS WITH FRANK & THIS IS BY
CHOICE SINCE FRANK WAS AT ZEPHYRUS
& I WAS MOSTLY AT PRACTICE

* [NOT EASY / NEVER A RELATIONSHIP /
NO QUESTION OF CATEGORIZING RELATIONSHIP

[CUT OUTS SINCE PLAYERS NOT AVAILABLE
NOT INVOLVED IN THAT DECISION ABOUT
THE CAMPBELL

- ASKED IF SHOULD USE BOZILL PLAYERS OR
DUNN HANSTON

- Comm to the THAT people could follow the Directors - No
- not only comm was a matter of work together, whatever obligations we have, we fulfill & act in a professional manner
- [Hired someone to make sure players got there on time & acted in a prof. manner
- After N. stars after I got here

- June/2005 / Recordish for phone like / Advice to participate, that told still I don't think I should
- Be on phone selling tickets
- Risk of being made fun of

- [AD sales meeting / have, wasted my valuable time / NO I said it to her?
- [Went to ad sales meeting / gave a presentation
- [Not saying in a suit & don't juggle, but still a way to instruct someone
- [If said in context of play
- [Not saying that

- RETSA POPE - FLIRT WITH?

REES / NO

~~POPE SEEN~~

(IF SO, DIDN'T WORK

- TOLD D. WOULD HEN, ETC. - NO

/ Dec. 14 / GATE HOB / "I CAN'T LET
ANY LOVE?"

/ SPANDED IN TUNNEL

/ HER BACK WAS TO ME

/ GRABBED BY SHOULDER

/ 1ST TIME HASTY ON MESS TO ME

AND SHE PULLED AWAY & GAVE

ME BIL LOOK

/ EMBARRASSED TO ME WITH

USERS THEN

/ ASKED IF OK BUT NOT "I CAN'T

LET ANY LOVE"

/ 1ST TIME ^{UNCOMFORTABLE} ~~UNCOMFORTABLE~~ & LG

TIME AFTER-NOON DISTANCE

/ CHAD HUBBARD BEFORE / NO PROBLEMS

& ALL VISITERS COULD TALK TO THAT

I'm Positive Not ~~to~~ Happen
ON MY END TO CAUSE THIS

DEC 2001 Game of Horse - I love you, you
Beautiful like the movie -
Doesn't
I DON'T RIDE A BULL FOR ME
Labeled
/ DID PLAY HORSE AT XMAS
PARTY & SEVEN OTHERS

3/11/2005 / SCAR OVER EYE, ETC
I love you
/ I SAID I LOVE WATUATA?
Labeled & SAID HO
/ DIDN'T KNOW SHE HAD A SON

DO YOU HATE MEN - I DO
I DON'T HATE ANYONE

EVER TOLD YOU, YOU WERE
UNWILLING IT DIFFICULT TO DO JOB TO
SHE RECEIVED ALL SHE HAD TO
TO DO JOB

OFF SITE MEETING / NEVER ASKED
FOR RISE
WHEN SHE WANTED TO MEET I HAD
FRANK MEET WITH HER / I HAD TO INTERACT

with him

Why would she say those things

- Come out of Blue

- They never happened

- I don't take seriously, But

I do because it's a serious matter

~~From~~ she never complained about Frank (abuse) then - she only said

- Embarrassing & a boot

- I can't get any table done with him

If she would have said Frank

was inappropriate I would have done something

I had had complaints about

Frank with others about getting

away, and I saw him down

& talked to him

DO YOU UNDERSTAND THAT
ANUETA COULD FEEL HER POSITION
WAS BEING USURPED?

NO, JEFF HIR & ANUETA HAD
CLOSE RELATIONSHIP & JEFF
RAN EVERYTHING & ANUETA
WAS HIS RIGHT HAND

- I KEPT JEFF AS ASST GM
- I ASKED STEVE WHAT HER DUTIES
WERE
- I THINK SHE LIKED BEING WITH
BASKETBALL & MAKING
DECISIONS RATHER THAN
RUNNING HER OWN DEPT
- I WANTED CHAIRMAN BUT NOT
OUT OF DISLIKE

- DID THE SET TONE THAT BASKETBALL
IS EVERYTHING & ~~FORGET~~ FORGET THE ELSE
- WE ARE A BASKETBALL BUSINESS
1ST
- NOT A COMMUNICATIONS BUSINESS

DSIAH



2ND INTERVIEW

Essex

1 hour

1/11/06

Roche

FACT SHEET / MID JAN

2004 / MARCH 10 / PULLED INTO ROOM

MARCH 22 / DISCUSSING DUTIES

OCT. 30 / STAY CLOSE TO ME

INTERVIEW

HAS STEPHEN SAID ANYTHING ABOUT DANIELA
WHAT DID HE SAY WHEN YOU TOLD HIM
HARRIS WAS BEING TALKED?

FACT SHEET SHORTLY AFTER YOU ARRIVED?

BEFORE WORKED - IF GUY SAID ME INTO I
PROB VIEWED IT AS HELPFUL, I'M
SURE I APPRECIATED IT

- NO SPURIAL RECOLLECTION

- NOT OFFENDED AT ALL

MARCH 10 / 2004 / I REMEMBER THE GUY

/ RIGHT IN THE MIDDLE OF PLAYOFF PUSH
AND HEAVY HANDED WITH PLAYERS

/ LOSING FACE THAT'S UNACCEPTABLE

/ ELI FORME WOULD WILL MAKE SURE

THOSE EGGS OR SOMETHING WILL GOOKS

DON'T TAKE PHONE - WILL TRY TO GET

DOWN WITH ANY ACTIVITIES YOU HAVE

MEET WITH FRANK WARRINGTONS &

SPEAK TO ANTHONY BARTON NEXT YEAR

2

... AND LET STATES IN ADVANCE & GO
... OTHER NOTES

... LOOK LIKE DOING SOMETHING IMPACT
... INTO AIR AND THEY NEEDED THEIR
... ENERGY

... DON'T BELIEVE SHE I THINK RIGHT HERE
... WE HAD PLUMBERS BLOW OFF IN
... PAPERWORK - HAS SHE SAID THERE WAS?

... TOLD HER WE CAN'T HAVE PLUMBERS WITH
... THE MOST MINUTES GO TO ENERGY LEVEL &
... DRAIN ENERGY

[OFF SOME WHAT YOU PULLED HER INTO A ROOM
... THAT NEVER HAPPENED / IF WOULD HAVE
... TAKEN PLACE SOMEONE WOULD HAVE BEEN
... ON HERED ON SEED

Some time later - STATED THERE AFTER I START
... SHE STATED MET / I SAID I WILL MAKE
... SHE PLUMBERS ARE WITHIN THEY ARE
... SUPPOSED TO BE AND ACT PROPERLY
... NEXT YEAR WE WOULD SENSITIVITY D
... PLUMBERS & ENERGY LEVEL

3

When I got there it was hot HARDY times
Foot loose / it was common nervous / BACKSTAIR
OPS AND ALL INTENTIONS

BUY'S DEEDS FOR USE ENERGY

IF PLAYERS COMMITTED TO IT, WE DID IT /
FROM THAT TIME WAS A TIME WE
DIDN'T TRY TO ACCOMMODATE / IF NOT,
WE HAD A RATIONALE REASON

I DIDN'T GET SENSE FROM HER THAT I
WAS INTERESTED & I RESPONDED TO
A QUESTION

WENT OUT OF WAY TO ACCOMMODATE THE
THINGS THEY WANTED

DID SHE EVER COMPLAIN ABOUT PLAYERS' ^{AVAILABILITY} HTA
"I NEVER HEARD THAT"

IF A PROBLEM SHE ALWAYS WENT TO STEVE,
I ASSURED STEVE WE WERE WORKING
WITH HER

DON'T THINK SHE EVER COME
TO ME ABOUT PLAYERS
AVAILABILITY

4

TAD He consented to the written comments
A

STEP - she (Anwanda) seems to work to better
... SAID I'm doing everything you want
... me to do and more

- TOLD Him FRANK & SHE met once a week
- MAYBE ISSUE IS SHE WANTED TO MEET
... WITH THE WIVES OF FRANK &
- FRANK WAS IN DAILY & I CAN'T
... COMMITTED IN FIELD DEPARTED WITH PLANNING &
... DIVISION / OFFICE OF STREET - FRANK ALBERTS

I may have met with ANWANDA
... MANYBE 4 OR 5 TIMES

SHE TRIED TO SET UP MEETING WITH ME? I
... TOLD HER THAT I WOULDN'T BE MEETING
... WITH HER UNLESS SHE WANTED TO
... WILL ARRIVE & FRANK WILL WORK
... WITH HER. WE WILL FULFILL OUR
... OBLIGATIONS

I DON'T INTERACT WITH ANWANDA, SHE
... WOULD HAVE HAD COMPLAINTS TO STEVE

I

A lot of people come & lines to me, they
had problems w/ [redacted] one
reason he is not here

WHAT KIND OF COMPLAINTS
- SETS UP / LOUD / OPERATIONAL OPERATIONAL
- most people finds a way to forgive &
OVERLOOK
- NOT TO POINT THE FINGER KEEP FINGER WITH
OVERLOOK

see [redacted] as a liability - NO, EVER
[redacted] there no when he had to go

FEEL NEED TO TRY IMPROVE RELATIONSHIP
BETWEEN [redacted] & [redacted] - NO
PERSONAL CONFLICT, BUT WORK THAT
NEEDS BUT SOME WHO'S BETTER OFF
FOR RESPONSE TO DID YOU TRY TO IMPROVE
RELATIONSHIP?

EVER BLAME FROM SOME THAT [redacted]
WAS ANGRY OR HOSTILE? NO, BUT
SHE KNOWS THAT [redacted] IS. EVEN
SAW [redacted] BE ANGRY OR HOSTILE
W/ MY PROTECTIVE / WOULD HE
BE OBVIOUSLY IN SHORTER

6

made sure he didn't get it
if he didn't agree with you

- I don't think I saw Hemm [redacted] swear
- Heckerling, heard him refer to [redacted] in those terms - BITCH / WHORE
- Heard call someone DUMB

[redacted] NOT HERE BECAUSE OF A LOT OF STUFF
STUFF - we all have BOSSSES

1st got [redacted] and me [redacted] with
should be my right hand & I
should keep him

saw he was pretty solid but as to
mechanics he wasn't what I was
used to handling

- I was assuming she felt he should be
assistant on [redacted] if I was [redacted]
president

- didn't talk to [redacted] about his activities
- Danvers & made Dir of [redacted]
- [redacted] was unhappy - I don't know

8

200?
OCT. 20 / SATY close to me & make
a lot of money

ES: what - Does it sound like I'm talking to her?
DON'T REMEMBER SATY ILLU THAT

NEWSIES you saw the you know that / OFF SITS, ETC

I would never meet with her

" " " had a meeting with her

can't say I didn't

JUST GOT WORK, NOT BEING SMART NOT
TRICK A MEETING

FEAS TO GET TOGETHER, COMMON + GARDEN
TO OTHERS, SHE WASN'T IMPORTANT
& DIDN'T NEED TO BE RESPECTED

I had no dealings with her
ANY GOING ON WAS, SHE DID ON HER OWN

WHEN I GOT HERE I HAD A PROBLEM
QUARTER



I HAD A PROBLEM
WITH ONE PERSON HERE / ON A
ROAD TRIP THE PROBLEM / I WAS ON
THE BIKE & SHE SAID YOUR PROBLEM
IS YOU NEED TO LOSE WEIGHT & IF
YOU DON'T YOU CAN NOT GET US.

9

Several other players complaining

E got no that two were x player on person they didn't have to do what she said

- recounted stephan's / statement of incident with betty into general room
- told her that was a bit mistake since we have no policy
- she took a hard stance of that set her off on a poor relationship with him

Rochelle outlines ANCHA'S POSITION ON THE WHOLE

ESIAH - she came to me, I said for right now lets go with it, I don't know who is important to him

- he was special family about only family
- but on that with I made a home and she did not to do visit to it also
- Bill deal about him coming back home
- based with me knew who was family, friends, etc

CO

OTHER PLAYERS COMPLAINED? TO ST GUYS
ALSO SWEATY / HOT PANTS
HAIR ON HANDED HEMM

HE DIDN'T SPEAK TO HER ABOUT THIS OR
TO STONE

HAPPENED ON SOMEONE ELSE'S WATCH

JEFF AND WADA DID HEAVY LIFTING OVER SCOTT

ASKED ABOUT SEPORA & MASSARD & WATKINS

ASKED IF NEED A LAWYER

I AM SO DISAPPOINTED

TOOK SHIT FOR ~~STILL~~ [REDACTED]

HOW THAT IS UNDERSTAND, IT IS SICKENING

I WAS ALWAYS LOYAL BUT I STOOD WITH ^{BEHIND} ~~GRASS~~

EVERYBODY SHE EVEN WANTED SHE GOT

FRANK PROBABLY SO TO TO SOME TALK-HEAT

HE DIDN'T BRING TO ME

HEVEN SAID NO FOR SPYHANTO, ACCUSATS
(HAD A PLACE)

CO

OTHER PLAYERS COMPLAINED? JUST GOING
ON MOUNTAIN / ALSO SWEATY / HOT PANTS
HAD ON HANDED HEAVY

HE DIDN'T SPEAK TO HER ABOUT THIS OR
TO STEVE

HAPPENED ON SOMEONE ELSE'S WATCH
JEFF DANIELA DID HEAVY LIFTING UNDER SCOTT

ASKED ABOUT SEPHORA & HASSAN & ANTOINETTE

ASKED IF NEED A LAWYER

I AM SO DISAPPOINTED
TOOK SHIT FOR CRYING PR. CALVANA

KNOW THAT I UNDERSTAND, IT IS SICKENING

I WAS ALWAYS LOYAL BUT I STOOD WITH ^{GROUND} ~~GROUND~~
EVERYBODY SHE BEEN WAITING SHE GOT

FRANK PROMISING SO HD TO SOME TALK THAT
HE DIDN'T BRING TO ME

HELEN SAID HD FOR GRAYMANTO, ACCOUNTS
HAD A PLACE

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I WANT TO FIGHT
THIS IS WRONG

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