

EXHIBIT A

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

C O N F I D E N T I A L

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
11-CV-03605(JSR)(HBP)

-----x

IRVING H. PICARD, Trustee for
the Liquidation of Bernard L.
Madoff Investment Securities LLC,

Videotaped
Deposition of:

Plaintiff,

CHRISTOPHER STAMOS

vs.

SAUL B. KATZ, et al.,

Defendants.

-----x

Transcript of testimony as taken by and before
LESLIE ROCKWOOD, Certified Court Reporter, RPR and Notary
Public of the State of California, at the offices of
Shearman & Sterling, Four Embarcadero, Suite 3800,
San Francisco, California, on Wednesday, January 4, 2012,
commencing at 9:31 a.m.

1 MR. DITCHFIELD: Objection.

2 THE WITNESS: Again, I don't like the word
3 "have to." So I would say no, he didn't have to do
4 anything, but...

5 Q. BY MS. KOSACK: Did Peter ever consult with
6 Saul Katz in connection with the co-branding projects, to
7 the best of your knowledge?

8 MS. BIEBER: Objection.

9 You can answer.

10 MR. DITCHFIELD: Objection.

11 THE WITNESS: To the best of my knowledge, he
12 didn't because I don't think Saul would be interested in
13 the logo or --

14 Q. BY MS. KOSACK: Did Peter ever consult, to
15 the best of your knowledge, with David Katz in connection
16 with the co-branding projects?

17 A. Again, to the best of my knowledge, no, but
18 that was eight years ago and...

19 Q. To the best of your knowledge, did Peter ever
20 consult with Fred Wilpon in connection with the
21 co-branding projects?

22 A. That I'm pretty sure he didn't. Again, if
23 Saul was removed, Fred was even more removed. So I would
24 be surprised if Fred wanted to look at our logo.

25 Q. And going back to the halo effect, what, if

1 any, halo effect did you hope to obtain from Sterling
2 Equities?

3 A. My understanding was the 30-some years of
4 doing business in New York, Saul and Fred had a
5 reputation for taking care of their partners, being very
6 ethical, being very generous, their philanthropic work,
7 they've earned a reputation for being very quiet and
8 generous in their giving.

9 And baseball, in our business, baseball
10 carries a lot of weight. So owning the New York Mets,
11 having access to the owner's box is a great thing for
12 clients, and hedge fund managers like baseball in
13 general.

14 Q. And when you say in your business baseball
15 carries a lot of weight, what else did you mean in
16 addition to what you just said, if anything?

17 A. I don't think I meant anything more than if
18 you could call up someone and say, "Do you guys want to
19 come to the owner's box," they would be pretty happy
20 about it.

21 Q. Where did you obtain your understanding of
22 the information you just described as part of the halo
23 effect of Sterling Equities?

24 MR. DITCHFIELD: Objection to the form.

25 MS. BIEBER: Objection.

1 Q. Did he provide you any more specifics when
2 he referred to Fred Wilpon being invested with
3 Bernie Madoff?

4 A. No. I never really knew how much was Saul,
5 Fred, or if it was through an entity or a trust or --

6 Q. Did Peter Stamos ever tell you that any other
7 Sterling Equities partners were invested with
8 Bernie Madoff?

9 A. It was implied, but I never knew the specific
10 people or the specific amounts or anything like that.

11 Q. When you say "it was implied," what do you
12 mean by that?

13 A. Meaning the way Peter talked, it was that
14 "Our clients" -- "A lot of our clients will have money
15 with Bernie. We're going to be compared to Bernie. So
16 you should know that."

17 Q. And when you say "we're going to be compared
18 to Bernie," what do you mean by that?

19 A. Meaning --

20 MR. DITCHFIELD: Objection to the form.

21 THE WITNESS: -- Bernie's returns would be
22 our benchmark, because people in our community thought
23 Bernie was a God. You know, back then no one would have
24 conceived that Bernie was the guy that he turned out to
25 be. And to get access to Bernie was like gold.

1 And so him being the gold standard, you're
2 going to be compared to his numbers. Basically numbers.
3 That's all we could compare.

4 Q. BY MS. KOSACK: Did Peter ever tell you which
5 investors compared Bernie's returns to the Sterling
6 Stamos returns?

7 A. No.

8 Q. Did Peter ever tell you how the Sterling
9 Stamos investors that were invested with Bernie Madoff
10 got their access to Bernie Madoff?

11 A. No.

12 Q. Did you have any understanding as to whether
13 the Sterling Stamos investors who were invested with
14 Bernie became Sterling Stamos investors because of
15 Saul Katz?

16 MR. DITCHFIELD: Objection to the form.

17 MS. BIEBER: Objection.

18 You can answer.

19 THE WITNESS: Could you repeat the question
20 for me?

21 MS. KOSACK: Can you read the question?

22 (The record was read by the reporter as
23 follows:

24 "QUESTION: Did you have any understanding as
25 to whether the Sterling Stamos investors who