

1 PRIVILEGED AND CONFIDENTIAL ATTORNEY WORK PRODUCT

2 OFFICE OF THE COMMISSIONER
3 MAJOR LEAGUE BASEBALL
4 350 PARK AVENUE
5 NEW YORK, NEW YORK

6 -----
7 In the Matter of: :
8 Peter Edward Rose, Manager, :
9 Cincinnati Reds Baseball Club :
10 -----

11 Deposition of RONALD PETERS taken in
12 Cincinnati, Ohio, on April 5, 1989, at 10:30 o'clock a.m.

13 APPEARANCES:

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31 PRIVILEGED AND CONFIDENTIAL ATTORNEY WORK PRODUCT

P R O C E E D I N G S

1
2 MR. DOWD: This is a confidential
3 deposition taken for the Commissioner of Major
4 League Baseball.

5 I am the special counsel to the
6 Commissioner. And Mr. Baldwin, Court Reporter, has
7 been hired by me to take this sworn statement from
8 you, Mr. Peters. And this statement remains
9 confidential until the Commissioner decides
10 otherwise.

11 In the event that the Commissioner wants to
12 publish any portion of this deposition at some
13 later date, depending upon certain events and
14 circumstances, then I have represented to you and
15 your counsel, Mr. Ruppert, that I will consult with
16 you about that.

17 I will tell you that the Commissioner is
18 sensitive to avoiding any prejudice to individuals
19 or proceedings; but he also has a significant
20 obligation to the public and to the game of
21 baseball. But that's the best I can commit to you.

22 And, in addition, I will hold this
23 deposition, when it's completed, in my office. Any
24 time that you would like to read it or consult with
25 it, just let me know and I'll make sure it's

1 available to you so you can read it.

2 I think that's the safest way to do it to
3 protect the integrity of the inquiry and the
4 integrity of the Commissioner's office. But,
5 again, on behalf of the Commissioner we appreciate
6 your taking the time to visit with us and to
7 furnish information.

8 I'd like Mr. Baldwin to swear you right
9 now.

10 Whereupon,

11 RONALD PETERS

12 having been first duly sworn, was called as a witness
13 herein, was examined and deposed as follows:

14 EXAMINATION

15 BY MR. DOWD:

16 Q Ron, would you give me your entire name for
17 the record, please?

18 A Ronald Peters.

19 Q And how old are you?

20 A Thirty-one.

21 Q And where were you born?

22 A Cincinnati, Ohio.

23 Q And what is your birth date?

24 A 4-29-57.

25 Q And where were you raised?

- 1 A In Franklin, Ohio.
- 2 Q How is your dad employed?
- 3 A He works for the Post Office.
- 4 Q How long has he worked for the Postal
5 Service?
- 6 A Twenty-three years, approximately.
- 7 Q In Franklin, Ohio?
- 8 A Correct.
- 9 Q Do you have any brothers and sisters?
- 10 A One of each.
- 11 Q Are they older? Younger?
- 12 A Older brother; younger sister.
- 13 Q And where did you go to school?
- 14 A Franklin High School.
- 15 Q Did you graduate?
- 16 A Yes.
- 17 Q Did you go beyond high school?
- 18 A No.
- 19 Q What did you do after you left high school?
- 20 A I became Assistant Golf Professional at
21 Beckett Ridge Country Club in West Chester.
- 22 Q How do you spell -- Becken Ridge?
- 23 A Beckett. B-e-c-k-e-t-t.
- 24 Q You became Assistant Pro at Beckett Ridge?
- 25 A Right.

1 Q And how long were you the Assistant Pro?

2 A Approximately until '83.

3 Q Are you a member of the Professional

4 Golfer's Association?

5 A Not now, no.

6 Q Were you?

7 A Yes. I retained my amateur status.

8 Q You did?

9 A Right.

10 Q And you still do today?

11 A Right.

12 Q Do you still play golf today?

13 A Yes.

14 Q What's your handicap?

15 A It's supposed to be scratch.

16 Q Did there come a time when you became a

17 bookmaker?

18 A Yes.

19 Q Would you tell me what a bookmaker does?

20 A A bookmaker takes bets from individuals on

21 various sports.

22 Q And in 1984 were you a bookmaker?

23 A Yes.

24 Q Have you ever been convicted of a felony?

25 A No.

1 Q Do you intend to plead guilty to two
2 Federal felonies?

3 A Yes.

4 Q And you've made an agreement with the
5 United States Government?

6 A Yes, sir.

7 Q And can you tell me briefly what those
8 charges are you intend to plead guilty to?

9 A The first count was trafficking in cocaine
10 and the other one was false information on a tax return.

11 Q Did you, in fact, traffic in cocaine?

12 A To the respect that I introduced the buyer
13 to the seller and the buyer was an FBI informant.

14 Q Did you and have you trafficked in cocaine?

15 A Never in my life. I never saw the cocaine
16 that time; or the money.

17 Q Okay.

18 A I didn't profit from it either.

19 Q All right. And the tax charge involves
20 evasion of the payment of taxes?

21 A Not the evasion. It's just false
22 information.

23 Q On your tax return?

24 A Right.

25 Q And I take it you're going to enter that

1 plea within the next 45 days?

2 A Correct.

3 Q And you are cooperating with various
4 agencies of the United States?

5 A Correct.

6 Q And you're giving them truthful and honest
7 cooperation?

8 A Absolutely.

9 Q Now, on behalf of the Commissioner we have
10 an understanding; do we not?

11 A Yes, sir.

12 Q And you correct me if I'm wrong, but in
13 exchange for your full and truthful cooperation with the
14 Commissioner, the Commissioner has agreed to bring to the
15 attention of the United States District Judge in
16 Cincinnati, the fact that you were of assistance to us and
17 that we believe that you have been honest and complete in
18 your cooperation.

19 Is that the understanding?

20 A Yes, it is.

21 Q And participating in this deposition today
22 is part of that cooperation?

23 A Right.

24 Q Now, I've asked your counsel to advise me
25 as soon as possible the name of the United States District

1 Judge who will be handling your plea and your sentence.
2 And I will arrange for the Commissioner to communicate
3 directly with that Judge and outline, confidentially, to
4 the Judge what you've done to assist Major League Baseball
5 in this inquiry.

6 I should say for the record, this is an
7 inquiry by the Commissioner conducted in a confidential
8 manner into the activities of Peter Edward Rose, who is the
9 Manager of the Cincinnati Reds Baseball Club in Cincinnati,
10 Ohio.

11 Would you please tell me whether you
12 engaged in bookmaking activity in 1984?

13 A Yes, I did.

14 Q And did you have occasion to meet with a
15 gentleman by the name of Tommy Gioiosa?

16 A Yes, sir.

17 Q And would you tell me how you came in touch
18 with Tommy Gioiosa, if you know?

19 A Yes, I remember. I met Tommy Gioiosa, I
20 knew him as Gio, at Gold's Gym through a personal friend of
21 mine who was looking for -- Gio was looking for a bookmaker
22 to make bets for Pete Rose. And, consequently, those two
23 guys worked out at the same gym, Jim Eveslage and Gioiosa
24 --

25 Q Spell Eveslage for the reporter.

1 A Eveslage is E-v-e-s-l-a-g-e. Eveslage
2 introduced me to Gioiosa and he started making bets with
3 me.

4 Q What did Gioiosa tell you he wanted to do?

5 A Make bets for Pete Rose.

6 Q Did he indicate the size of the action?

7 A Yes. He told me they would be somewhere
8 around a thousand dollars to begin with, a game. But it
9 immediately jumped to two to five thousand a game.

10 Q And do you recall approximately when in
11 1984 this took place?

12 A I would assume it was during football
13 season. I'm not positive.

14 Q That would be the fall of 1984?

15 A Right. Right.

16 Q That's your best recollection?

17 A Yes.

18 Q Would you have accepted bets of one
19 thousand, two thousand or five thousand a game from Tommy
20 Gio if it was only Tommy Gio betting?

21 A Absolutely not.

22 Q Why not?

23 A Well, I knew he wasn't financially capable
24 of paying if he lost.

25 Q Okay. And your judgment on Pete Rose?

1 Q At any time during the period 1984, the
2 fall of '84, 1985 and 1986, did you have any direct
3 communications with Mr. Pete Rose, the Manager of the
4 Cincinnati Reds?

5 A Over the phone?

6 Q Yes, first over the phone.

7 A Over the phone, yes. I had an occasion to
8 speak with Mr. Rose approximately four to six times
9 concerning betting major league baseball.

10 Q When Mr. Rose bet major league baseball
11 with you, do you recall what amounts per game?

12 A It was normally two thousand a game but
13 sometimes five thousand.

14 Q In the vernacular of the trade, did he bet
15 two dimes?

16 A That's what two thousand means.

17 Q Is that the terms that he used?

18 A Yes.

19 Q Did he usually know what the line was when
20 he called?

21 A Only from what the paper would say. He had
22 an assumption what the line was.

23 Q Okay.

24 A And then of course the line is always a
25 little bit different than the paper but not much.

1 Especially on baseball.

2 Q And when he bet baseball, did he bet on the
3 Cincinnati Reds?

4 A Yes, he did.

5 Q And was this at a time that he was the
6 Manager of the Cincinnati Reds?

7 A Yes, sir.

8 Q Is there any doubt in your mind?

9 A Absolutely not.

10 Q And he would normally bet two thousand
11 dollars per game?

12 A That's right.

13 Q I take it that most of the betting action
14 on baseball, and on the Reds, on behalf of Pete Rose, was
15 done by Tommy Gioiosa --

16 A Correct.

17 Q -- during the period of time we're talking
18 about.

19 A Correct.

20 Q Did there come a time when Pete Rose came
21 to Franklin, Ohio to see you?

22 A On one occasion he came. He came himself
23 in his own Porsche and in another Porsche was Mike Fry and
24 Tommy Gioiosa. They were coming to collect thirty-six
25 thousand or thirty-seven thousand, I believe, from me. And

1 the three of them sat down and had lunch with me. Pete
2 also brought an autographed baseball bat to Jonathan's Cafe
3 from Pete Rose.

4 Q And can you describe that bat for us?

5 A It's a black Mizuno bat that he last used.

6 Q Is that M-i-z-u-n-a?

7 A M-i-z-u-n-o.

8 Q Okay. And it's autographed how?

9 A "To Jonathan's Cafe. Best wishes, Pete
10 Rose."

11 Q And do you still have that bat today?

12 A Yes, I do.

13 Q And Mr. Rose, Mr. Gioiosa and Mr. Fry --
14 tell us who Mr. Fry was or is?

15 A Mr. Fry was the owner of Gold's Gym where
16 the bunch of them worked out.

17 Q Did Mr. Rose collect this money from you?

18 A Not personally. I gave the money to --

19 Q Just answer the question and then I'll ask
20 you how it happened.

21 A Okay. Yes, he did. He collected.

22 Q And tell us how it happened.

23 A I gave the money to Tommy Gioiosa. He
24 stuck it in his sock.

25 Q And where did that transfer of cash take

1 place?

2 A Somewhere in the restaurant. I'm not sure
3 exactly where. Maybe back in the restrooms or back in the
4 kitchen or somewhere. It was not out in front in the open.

5 Q It was not done openly?

6 A No.

7 Q Okay. I take it that Pete Rose would lose
8 sometimes and he would win sometimes on all this sports
9 action?

10 A Yes.

11 Q Can you tell us how he did on basketball
12 and football?

13 A Basketball and football he lost. Baseball,
14 he won.

15 Q Can you give me, over that period of time,
16 '84, '85, '86, the frequency with which Mr. Rose or Mr.
17 Gioiosa, on behalf of Mr. Rose, bet on sports activity?

18 A Depending on the season, if it was football
19 it was every Sunday, in the NFL.

20 Q Okay.

21 A College basketball it was maybe three or
22 four nights a week. And the same with baseball.

23 Q Whenever games were played?

24 A Whenever the games were played, yes.

25 Q Can you think of a time that he bet on

1 baseball that he did not bet on the Reds?

2 A No, I can't.

3 Q Did you have some kind of code to identify
4 Pete?

5 A Yes. We issue everybody a number. Instead
6 of them calling in and say this is Pete, we put the number
7 14 down for Pete. But Pete would always call up and say,
8 "This is Pete."

9 Q Okay. Did you receive the calls from Pete
10 yourself?

11 A Yes. Yes, I did.

12 Q Did you have other people assisting you
13 taking calls from bettors?

14 A Yes, sir.

15 Q Who else?

16 A David Morgan.

17 Q And what does Mr. Morgan do for a living?

18 A He works maintenance at the Shaker Run Golf
19 Course in Middletown, Ohio.

20 Q And I think we've mentioned Jonathan's
21 Cafe. I forgot to ask you, are you the proprietor and the
22 owner of that Cafe?

23 A Yes, sir.

24 Q And how long have you owned it?

25 A Since the day it opened. It's been a

1 little over three years.

2 Q Can you remember any of the telephone
3 numbers that Rose or Gioiosa would call in on?

4 A Yes. 746-1511; 746-1800; and possibly 746-
5 1802.

6 Q Did anyone else take sports action for you?

7 A On one occasion -- a couple occasions
8 Charlotte James took names of teams down from Paul Janszen.

9 Q Is she known as Chuck?

10 A Correct.

11 Q How about your wife, did she take any
12 betting action for you?

13 A Very seldom, yes.

14 Q But every once in a while?

15 A Every once in a while.

16 Q Are you aware of anyone else taking a bet
17 from Pete Rose directly --

18 A No, sir.

19 Q -- in your operation? I'm sorry?

20 A No, sir.

21 Q Did there come a time in 1986 when Mr.
22 Gioiosa presented -- well, first of all, let me back up a
23 little bit.

24 Can you describe for the Commissioner the
25 mechanics of either your paying or your collecting Pete

1 Rose's gambling debts?

2 A Tommy Gioiosa and I would meet someplace.
3 Either at Gold's Gym, Jonathan's Cafe or somewhere in
4 between.

5 Q Okay. And would this occur on a weekly
6 basis or daily basis?

7 A It occurred whenever one of us owed the
8 other one fifteen, twenty thousand.

9 Q Do you recall an occasion when Mr. Gioiosa
10 presented checks to you on behalf of Pete Rose?

11 A Yes. One day he brought in three checks
12 for eight thousand dollars a piece made out to cash, signed
13 by Pete Rose, for the \$24,000 debt that he owed me.

14 I asked Gio to take them and cash them
15 himself. I didn't really want to cash the checks. So he
16 took the checks, cashed them and the next day he brought
17 the twenty-four thousand.

18 Q Okay. I'm going to show you, I think I
19 showed these to you yesterday, three checks. And they're
20 all drawn on the same account. And the checks are number
21 366, 367 and 368; is that correct? Am I reading correctly?

22 A That's correct.

23 Q And they're all dated February 5th, 1986.
24 And the check name is Pete Rose, First National Bank of
25 Cincinnati.

1 The first check is payable to Tommy Gioiosa
2 in the amount of eight thousand dollars; is that correct?
3 366?

4 A Right.

5 Q And it's signed by Pete Rose; correct?

6 A Right.

7 Q And it is indorsed on the back by Tommy
8 Gioiosa and it appears to be Mike Fry?

9 A Right.

10 Q Check number 367, the same bank, Pete
11 Rose's check, signed by Pete Rose, to cash for eight
12 thousand dollars. And that appears to be indorsed by Mike
13 Fry. And that's dated February 5th, 1986, if I read
14 correctly.

15 A Correct.

16 Q And check number 368, payable to cash, Pete
17 Rose's check, February 5th, 1986, in the amount of eight
18 thousand dollars signed by Pete Rose. That appears to be
19 indorsed by Gioiosa and Fry.

20 A That is correct.

21 Q Now, do you recognize those three checks as
22 the checks that Tommy Gioiosa showed you, sir?

23 A Those are, no doubt in my mind, the checks
24 that he showed me.

25 Q And does it appear to be on the approximate

1 date you recall that occurred?

2 A Yes.

3 Q Would you tell us why you would not take
4 these checks?

5 A Well, I just didn't want to jeopardize my
6 signature indorsing Pete Rose's checks in case he was ever
7 audited and they in turn would come to me.

8 Q So it's essentially to protect your
9 operation?

10 A Correct.

11 Q In any event, it was a debt owed by Pete
12 Rose to you?

13 A Right.

14 Q For gambling activity.

15 A That's right.

16 Q Do you recall an occasion when Pete Rose
17 called you directly and placed bets with you during the
18 baseball season and shortly thereafter you saw him on
19 television?

20 A I recall that incident distinctly because
21 --

22 Q Would you describe it for me? Don't just
23 take my words, just use your words.

24 A Yes, I remember that distinctly because he
25 called, Pete Rose called personally and made a bet, he also

1 bet on the Reds that day, and five minutes later I go look
2 at the TV and there he is in the dugout. So he obviously
3 made the call from somewhere in the stadium.

4 Q Or close to the stadium.

5 A Right.

6 Q All right. Did there come a time when you
7 taped Pete Rose?

8 A Yes.

9 Q And would you tell the Commissioner about
10 that?

11 A I taped Pete on an occasion when he
12 personally called and made seven baseball bets, one being
13 the Reds, as insurance, if you will, to make payment to me
14 if he ever decided not to.

15 Q And did you play that tape for Pete?

16 A I played it back to him immediately.

17 Q And what was his reaction?

18 A He was very upset.

19 Q And what did he say?

20 A He said, "What the hell did you do that
21 for?" And I told him the same thing I just told you. And
22 I told him business is business. And that's the only
23 reason I did it and no one else would get the tape.

24 Q All right. Do you have that tape today?

25 A Well, it's someplace in, I assume, my ex-

1 wife's possession. During a move from one house to the
2 other house it's been packed in one of those boxes. And we
3 are divorced now, so she's not too friendly to me to let me
4 in to look for it.

5 Q So you haven't been able to find it?

6 A Correct.

7 Q Yet.

8 A Right.

9 Q You feel confident it's in a box?

10 A Unless she has done something with it, it's
11 still there.

12 Q Now, in 1986 did there come a time when
13 Pete was indebted to you for gambling activity that he
14 placed with you --

15 A Yes.

16 Q -- and he declined to pay that debt?

17 A According to Tommy Gioiosa he declined to
18 pay it.

19 Q Can you recall approximately how much that
20 was?

21 A It was thirty-four thousand.

22 Q And did you ever receive that money?

23 A Not a penny.

24 Q And as a result of Pete's failure to pay
25 that debt, did you continue taking action from him or did

1 you stop taking action from him?

2 A Well, he actually stopped giving me action
3 after that incident happened. So, yes, I guess you could
4 say I stopped taking his action.

5 Q And was that in 1986?

6 A Correct.

7 Q Late 1986?

8 A Right.

9 Q Did Tommy Gioiosa ever try to explain to
10 you why Pete was unable to pay his debts?

11 A He said -- Tommy said that Pete said that
12 he's lost enough to me and another bookmaker in New York
13 and he just was not going to pay.

14 Q Did Gioiosa describe this bookmaker in New
15 York to you at all?

16 A No. He just told me it was a bookmaker in
17 New York. He didn't give any names or where at in New
18 York.

19 Q Did he indicate to you that it was a Mafia
20 bookmaker?

21 A Yes, he did.

22 Q Now, moving to 1987, in approximately May
23 of 1987, did you begin to take sports action for Pete Rose
24 again?

25 A Yes, I did.

1 Q And would you tell us how that came about?

2 A Paul Janszen came to visit me at Jonathan's
3 Cafe and said he would like to place bets for Pete Rose and
4 himself.

5 Q And can you tell me what you indicated to
6 him?

7 A I said Pete Rose owes me thirty-four
8 thousand dollars, there's no way that I'll take his bets.
9 And he said, well, wait a minute. And he checked with
10 Pete; Pete said he paid Tommy Gioiosa thirty-four thousand,
11 he has proof.

12 So he sent, Pete sent with Janszen, a
13 photostat copy of the front and back of the check made out
14 to Tommy Gioiosa, indorsed by Tommy Gioiosa and cashed.

15 And in that time Tommy Gioiosa and Pete
16 Rose split ways, as friends.

17 Q In early '87?

18 A Right. In late '86 probably, I believe.
19 Late '86.

20 Q Let me show you a check numbered 380 on the
21 account of Peter E. Rose, 105 East 4th Street, Suite 800,
22 Cincinnati, Ohio 45202, entitled 4th Street Income Trust.
23 A check paid to the order of Tommy Gioiosa in the amount of
24 thirty-four thousand dollars signed by Reuven Katz and, it
25 appears, Robert Pitcairn.

1 The check is indorsed by Tommy Gioiosa. It
2 appears to have been cashed.

3 I hand you that check and ask you if you
4 recognize it.

5 A Yes, this is the check. I remember
6 distinctly because I remember Reuven Katz signing the
7 check.

8 Q And were you given a copy of that check?

9 A Yes.

10 Q By whom?

11 A Paul Janszen.

12 Q Did, in fact, Mr. Gioiosa ever give you any
13 portion of that money, of thirty-four thousand dollars?

14 A Not a penny.

15 Q And I take it that you agreed to accept
16 Pete Rose's sports action bets because of that showing of
17 good faith?

18 A Yes.

19 Q Were you -- and what amounts do you recall
20 Mr. Janszen gave you for Pete Rose?

21 A Again, it was the same thing, two to five
22 thousand.

23 Q And would you have extended credit in those
24 amounts to Paul Janszen?

25 A Absolutely not.

1 Q Again, why?

2 A Knowing his background, I didn't think he
3 was financially capable of paying if he lost.

4 Q But you had already had prior experience
5 with Pete Rose?

6 A Right.

7 Q And in 1987, what was Pete Rose's
8 occupation?

9 A Manager of the Cincinnati Reds.

10 Q And am I correct that this betting took
11 place sometime from the middle of May until about July 4th,
12 1987?

13 A That's correct.

14 Q And during that time did Mr. Janszen, on
15 behalf of Pete Rose, place bets with you on the Cincinnati
16 Reds at the same time that Pete Rose was the Manager of the
17 Cincinnati Reds?

18 A Yes, he did.

19 Q And do you recall how well or how poorly
20 Mr. Rose did with respect to the baseball action from the
21 middle of May to the 4th of July, 1987?

22 A He did rather well.

23 Q Do you recall paying him any money during
24 that period of time?

25 A Yes, I did pay them one time. I'm not sure

1 exactly how much it was but it seems to be -- Paul I paid
2 approximately twenty-seven thousand.

3 Q Twenty-seven thousand in cash?

4 A Correct.

5 Q And for Pete Rose?

6 A Right.

7 Q His winnings?

8 A Right.

9 Q Okay. Again, during that period of time,
10 the middle of May to the 4th of July, are you aware of any
11 time that Pete Rose bet on baseball that he did not bet on
12 the Cincinnati Reds, if the Reds were playing?

13 A No, sir.

14 Q And you well knew that he was Manager of
15 the Cincinnati Reds when those bets were placed with you?

16 A Yes.

17 Q Do you recall anyone else placing bets for
18 Pete Rose during that period of time, with you?

19 A No.

20 Q How about Danita Marcum?

21 A Oh, I'm sorry, yes, Danita. Paul's
22 girlfriend. I forgot about her.

23 Q Danita Marcum?

24 A Correct.

25 Q She, from time to time, would place bets

1 with you?

2 A It was seldom. Maybe three or four times.

3 Q Okay. But you knew her to be Janszen's
4 girlfriend?

5 A Right. I've met her as Janszen's
6 girlfriend.

7 Q All right. And is there any doubt in your
8 mind that she was placing bets at the request of and for
9 Pete Rose?

10 A Oh, no doubt.

11 Q It was the same kind of amounts?

12 A Yes.

13 Q All right. Now, did there come a time
14 toward the end of June when Pete won a good deal of money
15 from you?

16 A Yes. At the end he was somewhere around
17 forty some thousand ahead.

18 Q Okay. And did you pay him?

19 A No. No, I felt that he still owed me
20 thirty-four thousand, even though he thought he paid. He
21 did pay, but I didn't get the money.

22 So Paul and I settled up. I gave him three
23 post-dated checks in the amount of two thousand dollars a
24 piece made out to Paul.

25 Q Okay.

1 A And that settled the account in my mind.

2 Q As far as you were concerned.

3 A Right.

4 Q Okay. Were you aware of whether Pete Rose
5 was indebted to Paul Janszen?

6 A No.

7 Q Was that ever discussed with you?

8 A No.

9 Q During the period of time, that's 1984,
10 '85, '86, '87, that you took gambling action from Pete
11 Rose, including baseball and including the Cincinnati Reds,
12 while he was the Manager of the Cincinnati Reds, were you
13 ever a guest of Pete Rose at Riverfront Stadium in
14 Cincinnati?

15 A Yes.

16 Q And can you tell me how that was arranged?

17 A Usually it was through Paul Janszen or
18 Gioiosa. I would let them know and then they would tell
19 Pete and Pete would leave tickets either under my name or
20 Janszen's name.

21 Q And did you attend those games?

22 A Yes.

23 Q Did you take anybody with you?

24 A Yes, I did.

25 Q Do you remember who?

1 A Well, one time it was -- or maybe both
2 times -- two times it was Theresa; then another time I
3 remember taking Dave Morgan. Theresa is my girlfriend.

4 Q Okay. Do you recall where Pete was when he
5 called you the four or six times directly to place bets?

6 A No.

7 Q He never indicated to you?

8 A No.

9 Q Were all the bets that were placed with you
10 by Gioiosa and Janszen and Rose and Danita Marcum done by
11 telephone?

12 A Yes.

13 Q Do you recall anyone ever placing any bets
14 in person?

15 A No.

16 Q When Pete came to see you with Gioiosa and
17 Fry, did he place bets at that time or it was simply to eat
18 and collect his money?

19 A That's right.

20 Q Do you recall a conversation with a fellow
21 named Robert Pitcairn?

22 A Yes.

23 Q And do you know who Mr. Pitcairn is?

24 A He's one of Reuven Katz' associates.

25 Q Partners?

1 A Partner.

2 Q Okay. In their law firm?

3 A Yes.

4 Q At an earlier time, on March 23rd, you and
5 your counsel kindly provided us with a tape of that
6 conversation. And I've had it transcribed. I'd like to
7 stop for a moment and let you read the transcript and I
8 want to ask you some questions about it. Okay?

9 A Okay.

10 (The witness examined the document off the
11 record.)

12 BY MR. DOWD:

13 Q Have you just read a transcript of that
14 taped conversation?

15 A Yes, sir.

16 Q Is that a fair and accurate rendition of
17 that conversation?

18 A Yes, it is.

19 Q Did you call Mr. Pitcairn?

20 A Yes, I did.

21 Q Or did you call Pete Rose?

22 A I called Reuven Katz' office looking for
23 Reuven and then --

24 Q Did you leave a message?

25 A Right. And Mr. Pitcairn called me back.

1 Q You didn't ask Mr. Pitcairn to call you
2 back?

3 A No. I didn't even know him.

4 Q Had you ever met him?

5 A Never.

6 Q Had you ever heard of him?

7 A Never.

8 Q Did he ask you who you were?

9 A No, never. Not one time.

10 My opinion is he obviously knew who I was,
11 the way he was talking to me.

12 Q Was he friendly?

13 A Yes, very friendly. He never asked who I
14 was and is this a prank call or anything like that.

15 Q Which you would have expected since you'd
16 never known him.

17 A Right.

18 Q Like, "Who the hell are you?"

19 A Right.

20 Q I just want to cover one more thing with
21 you, Ron. And I do it not out of any disrespect and I
22 don't want to offend you at all, but I want to say to you
23 in the most serious way that I can, the most sincere way I
24 can, that the Commissioner of Baseball has a very serious
25 obligation here. And he is trusting you and your oath when

1 you testify, and I want you to testify again, that Pete
2 Rose, the Manager of the Cincinnati Reds, bet with you on
3 Cincinnati Reds baseball games; is that correct?

4 A That's correct.

5 Q If the Commissioner wanted to visit with
6 you and ask you himself, would you be agreeable to that?

7 A I'd be happy to.

8 Q I take it you have no ax to grind with Pete
9 Rose?

10 A Absolutely not. I have nothing personally
11 against Pete Rose.

12 Q Have you ever had a disagreement with him?

13 A Never.

14 Q Except the time you played the tape?

15 A Just the -- yes, right. And the time of
16 the thirty-four thousand dollar thing. But that was
17 because of his friend, so called friend.

18 Q Okay. Do you understand the seriousness
19 and the gravity of your own testimony?

20 A Yes.

21 Q And how it could possibly impact Pete
22 Rose's career and his future?

23 A Right.

24 Q And I take it you don't take that lightly?

25 A I'm feeling the pressure already from the

1 media.

2 MR. DOWD: All right. Well, I have nothing
3 further. Thank you very much.

4 (Whereupon, at 11:15 o'clock a.m. the
5 deposition was concluded.)

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STATE OF OHIO)
)
COUNTY OF HAMILTON) SS.

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

IN WITNESS WHEREOF, I hereunto set my hand and official seal of office, at Cincinnati, Ohio, this 6th day of April, 1989.



Gary L. Baldwin
Notary Public, State of Ohio

My Commission expires:
February 26, 1993