

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 07-12641-BKC-AJC

IN RE:

LORRAINE BROOKE ASSOCIATES, INC.,

Debtor.

Genovese Joblove & Battista, P.A.
100 Southeast 2nd Avenue
Miami, Florida
Wednesday, June 13, 2007
3:10 p.m. - 5:15 p.m.

2004 EXAMINATION OF ARNELLE SIMPSON

Taken before HELAYNE FURMAN WILLS, Shorthand
Reporter and Notary Public in and for the State of Florida
at Large, pursuant to Notice of Taking Deposition filed in
the above cause.

1 APPEARANCES:

2 GENOVESE JOBLOVE & BATTISTA, P.A.
3 BY: PAUL BATTISTA, ESQ.,
4 on behalf of Creditor Fred Goldman.

5 KENDRICK G. WHITTLE, P.A.
6 BY: KENDRICK G. WHITTLE, ESQ.,
7 on behalf of the Debtor.

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1 Thereupon:

2 ARNELLE SIMPSON,
3 was called as a witness by Creditor Fred Goldman, and
4 having been first duly sworn was examined and testified as
5 follows:

6 DIRECT EXAMINATION

7 BY MR. BATTISTA:

8 Q Can you state your name for the record?

9 A Arnelle Simpson.

10 Q Ms. Simpson, what is your relationship to
11 Lorraine Brooke Associates, Inc.?

12 A I am president of the company, along with my
13 brothers and sister.

14 Q They're also president?

15 A No. I'm sorry. They're -- I'm president.

16 Q And do you own any stock in the company?

17 A Yes.

18 Q How much stock?

19 A It's equal to everybody.

20 Q The other shareholders are your two brothers
21 and one sister?

22 A Yes, sir.

23 Q You own one-quarter each, 25 percent each?

24 A Yes.

25 Q I understand you've been deposed before, both

1 before this proceeding, and at least twice perhaps in
2 this proceeding.

3 With respect to today, my rules are pretty
4 simple in a deposition. To the extent you don't
5 understand the question, ask me to repeat it. I tend
6 to go pretty quickly. If I'm going too quickly, ask me
7 to slow down. I have no problem with you asking me to
8 rephrase questions, or simply telling me you don't
9 understand and trying again.

10 Any time you want to take a break, let me
11 know. As long as there's not a question pending we'll
12 take a break. If you want something to drink, you want
13 to go to the bathroom, that will be fine.

14 I'm going to try to get through this as
15 quickly as possible. It's 3 o'clock in the afternoon.
16 I know it's late in the day. I'm hoping not to take
17 the better part of the evening to do this. Hopefully
18 we can get through this quickly.

19 Any questions?

20 A No.

21 Q You are the daughter of O.J. Simpson?

22 A Yes.

23 Q Do you presently live with your father?

24 A Yes.

25 Q How long have you lived with him?

1 A Off and on for two years.

2 Q Here in Florida?

3 A Yes.

4 Q Is that when he first moved to Florida, two
5 years ago?

6 A No.

7 Q So he was living in Florida before you moved
8 in with him?

9 A Correct.

10 Q Do your brothers and sister also live with
11 him today?

12 A Yes.

13 Q How long have they lived with him?

14 A Since they moved here.

15 Q When was that?

16 A It's been, I would say, six years now.

17 Q So about 2000, 2001?

18 A Yeah, 2001, 2000, somewhere in there.

19 Q Other than this bankruptcy proceeding, I
20 believe you testified that you were involved in your
21 father's litigation.

22 Is that accurate? Do I have that correctly?

23 A I don't understand the question.

24 Q I think at your 341 meeting someone asked you
25 whether you had been deposed before, and you said yes.

1 In what context were you being deposed?

2 A In regard to this case.

3 Q This bankruptcy case?

4 A This bankruptcy case.

5 Q Before this bankruptcy case were you ever
6 deposed?

7 A No.

8 Q Were you deposed in the litigation that
9 Frederick Goldman commenced against your father?

10 A No. Meaning like we're doing right now?

11 Q Yes.

12 A No. I mean, I had a lawyer, and we spoke,
13 but it wasn't so formal like this.

14 Q I must have misunderstood. I want to make
15 sure that I clarify this.

16 A I'm confused.

17 Q I thought you had testified that you had been
18 deposed before this litigation, before this bankruptcy
19 case. If you haven't, we'll clarify it. If you have,
20 we'll try to identify it.

21 I can't seem to find it that quickly. Maybe
22 on one of our breaks I'll find it.

23 Do you remember when your father was sued by
24 Frederick Goldman in a civil case?

25 A I don't remember.

1 Q You don't remember it being some time around
2 1997?

3 A I don't remember. There's always people
4 coming after him, so I don't remember.

5 Q There's always people coming after him?

6 A Yeah. Little stuff here and there. I hear
7 about it, but I don't always know it.

8 Q Were you aware that Mr. Goldman obtained a
9 judgment against your father?

10 A I don't remember.

11 Q I'm not asking you as to when you first
12 became aware, but are you aware today that Mr. Goldman
13 has a judgment against your father?

14 A Yes.

15 Q Were you aware in 2006, just last year, that
16 Mr. Goldman had a judgment against your father?

17 A No. I mean -- no.

18 I don't remember. The timing is hard for me.
19 I don't remember.

20 Q You don't remember when you first learned
21 that Mr. Goldman had a judgment against your father, a
22 judgment that now is about \$38 million?

23 A I'm confused as to the question.

24 Q I guess I'm trying to understand whether you
25 were ever aware that Mr. Goldman had a judgment against

1 your father for approximately \$38 million?

2 A In regards to what?

3 Q In regards to a wrongful death lawsuit that
4 he filed against your father for the murder of his son.

5 A Yes.

6 Q You're aware of that?

7 A Yes.

8 Q I'm sorry for not being clear.

9 Do you remember when you first became aware
10 of that judgment against your father?

11 A Some time during the trial.

12 Q Which would have been back in 1997, late
13 '90s?

14 A Yes.

15 Q Were you aware that Mr. Goldman, in an effort
16 to collect on that judgment, had taken actions against
17 your father, whether it was to try to seize assets or
18 collect assets of your father's?

19 A Yes and no.

20 Q Do you remember an incident, as an example,
21 concerning the Heisman Trophy, when someone tried to
22 attach the Heisman Trophy your father had won?

23 A Yes.

24 Q That was back in the late 1990s?

25 A I guess.

1 Q You remember those efforts by Mr. Goldman?

2 A Here or there. I was really into myself at
3 the time. I was working. I don't always follow what
4 my dad does.

5 Q And that's fair. You don't have to follow
6 it. I'm not suggesting that at all. I'm just trying
7 to simply understand whether you had a recollection or
8 understanding that --

9 A A recollection, yes.

10 Q And that runs through today? You have the
11 same recollection and understanding today you had back
12 in the late '90s?

13 A I guess so.

14 Q Fair enough. Have you ever talked to your
15 father about Mr. Goldman's judgment, or attempts to
16 collect on that judgment?

17 A No.

18 Q Never spoke to him at all?

19 A Nope.

20 Q Let's turn to the book titled If I Did It.
21 You testified a good bit in your deposition and your
22 341 meeting about the circumstances surrounding it. I
23 don't want to repeat all that, because you already
24 testified to that. I want to delve a little more into
25 it.

1 You testified that a friend of yours, Raffles
2 Van Axle, had come up with the idea for the book. Is
3 that my correct understanding?

4 A Yeah.

5 Q And he brought that idea to you?

6 A Correct.

7 Q Did he go directly to your dad at any point
8 in time?

9 A I don't know that.

10 Q But as far as you know, he first came to you
11 with the idea?

12 A Yes.

13 Q And he asked you to do what with the idea,
14 approach your dad?

15 A He asked me what I thought about it, and
16 then -- he just asked me what I thought about it. We
17 had a discussion on that.

18 Q Do you remember about when that first came
19 up?

20 I'll try to put it in a time frame for you.
21 Lorraine Brooke Associates was formed as a corporation
22 on March 22, 2006.

23 So was it before that?

24 A Yes.

25 Q In 2005, in 2004? Do you have a recollection

1 of how far back that went?

2 A I want to say -- I don't remember. Some time
3 in 2005.

4 Q That's fair. It was certainly before the
5 company, Lorraine Brooke Associates, was formed?

6 A Yes.

7 Q Prior to that idea coming to you from Raffles
8 Van Axle, had you done any other deals with your dad,
9 or involving your dad's personality or name or anything
10 to that effect?

11 A Yes.

12 Q What other deals did you do?

13 A There was a video game.

14 Q I believe you testified to that before.

15 I won't go into the details of that, but in
16 that video game did you actually complete that deal and
17 earn money from that video game?

18 A Yes. Well, I did.

19 Q You did personally?

20 A But the game never came out.

21 Q Was that in 2005, 2004? How far back did
22 that go?

23 You can give me a guesstimate. I'm not
24 looking for anything exact.

25 Let's try it this way: Was it before Mr. Van

1 Axle came to you with the book idea?

2 A Yes.

3 Q When you had that video game deal with your
4 dad, did you form a corporation for that deal?

5 A No.

6 Q You just did a deal in your own personal
7 name?

8 A Yeah.

9 Q But the video game never came out?

10 A No.

11 Q Although you did earn some money in
12 connection with that?

13 A Correct.

14 Q So Mr. Van Axle comes to you with this idea
15 and you talk about it.

16 What did you say to him? He asked you your
17 opinion. What did you say to him?

18 A I said I had to think about it.

19 Q Did you get back to him?

20 A Yes.

21 Q And --

22 A He was very persistent.

23 Q I'm sure he was. I have not met the man, but
24 I've seen photographs of him.

25 Ultimately did there come a time when you had

1 another conversation with him, in which you said you
2 would pursue this book?

3 A Yes.

4 Q Was that the next conversation, was it
5 several conversations going back and forth?

6 A Back and forth.

7 Q Ultimately you decided that was something you
8 would pursue; is that right?

9 A Correct.

10 Q When you say you would pursue it, to you what
11 did that mean? Did that mean that you would go to your
12 father?

13 A Yes.

14 Q Did your approach your father with the book
15 idea?

16 A Yes.

17 Q Do you recall when that occurred?

18 A No. I mean -- no.

19 Q Late '05, early '06, roughly?

20 A '05.

21 Q It was before Lorraine Brooke Associates was
22 formed in March of '06; is that correct?

23 A Yes.

24 Q Do you recall where you were when you first
25 raised it with your dad?

1 A No.

2 Q What was his initial reaction?

3 A "I have to think about it."

4 Q Did he ultimately get back to you with his
5 views?

6 A Yeah.

7 Q What were his views?

8 A Basically, not knowing what to do, if he
9 should go forward with it or not.

10 Q He didn't know whether he should go forward?

11 A No.

12 Q Did he tell you why he was concerned about
13 that?

14 A Yeah. Here and there, just concerns,
15 personal ones.

16 Q Personal in the sense that he didn't want to
17 be associated with a book of that nature or what?

18 A His concerns behind closed doors are his
19 concerns for his life; how it would be done and how
20 people would perceive it, so forth and so on.

21 Q Did you discuss the book idea with your
22 brothers and sister?

23 A Yes.

24 Q Was that before you raised it with your dad
25 or after?

1 A After.

2 Q After your dad expressed his concerns?

3 A Yes.

4 Q How did those discussions go?

5 A They were random, very light. Nothing
6 specific.

7 Q In the sense that you said, "Hey, I have a
8 book idea for dad, what do you guys think about it?"
9 Is that how it went?

10 A Kind of, sort of. It was random
11 conversations here and there. Sometimes they were
12 finished, sometimes they weren't. Because I travel so
13 much, it was random. It was here and there.

14 Q Did your brothers and sister have an opinion
15 on the book?

16 A Yeah.

17 Q Were they initially in favor of it, initially
18 against it?

19 A They really didn't want to talk about it.

20 Q So you raised it with them and they really
21 didn't want to talk about it?

22 A At the time, no. They were concerned about
23 other things. They're teenagers.

24 Q Did there come a time when they expressed a
25 desire to go forward with the book, to be involved with

1 the book?

2 A Yeah.

3 Q And do you recall how those conversations
4 went, or what was said in those conversations?

5 A Just the potential of it and -- I mean, it's
6 so weird when I think about it now, looking back on it.
7 Just conversations.

8 It's an opportunity for us, and in the long
9 run there's opportunity, there's financial opportunity.
10 Basically, that's what it came down to.

11 Q Tell me about the financial opportunity.
12 What did they think the financial opportunity was?

13 A That we would all be a part of the book, and
14 that we would get money from the book when it came out.

15 Q Before you had the discussions with your
16 brothers and sister, did you have those same financial
17 discussions with your dad?

18 A No. Not like that, no.

19 Q Did you have any financial discussions with
20 your dad at or about that time, in considering whether
21 to do the book?

22 A I don't remember.

23 Q Do you remember whether you and your dad
24 discussed how much money you could earn from the book
25 and who the money would go to? There were no

1 discussions with your dad about that, at the time you
2 were talking about whether to do the book or not?

3 A Not necessarily with him, but with Raffles.

4 Q Tell me about those discussions with Raffles.
5 This is between you and Raffles?

6 A Everybody was going back and forth. It was,
7 "Is it going to happen, is it not going to happen?"

8 Of course, we can't have a book without my
9 father, so it was really up to him. And then going
10 from there.

11 Q You said you can't have a book without your
12 father, because it's your father's story?

13 A Right.

14 Q This wasn't anybody else's story, this was
15 his story?

16 A Right.

17 Q Do you know whether Raffles and your dad had
18 separate conversations?

19 A I don't know that.

20 Q If you don't know it's okay. You don't need
21 to be upset if you don't know.

22 A It's hard when somebody asks you to think
23 about something when you just do.

24 Q I'm one of the few lawyers who had the
25 pleasure of being on both sides of the table, asking

1 and answering questions, so I know how you feel.

2 Let's go back to the discussions with your
3 family.

4 Did you have any discussions with Denise
5 Brown about the book?

6 A No.

7 Q Anybody in Ms. Brown's family, her parents?

8 A No.

9 Q There was no meeting of the extended family,
10 your brothers and sister and the Brown family, to
11 discuss the book?

12 A No.

13 Q So at some point in time I presume the
14 decision is your father's, and he says to you, "I'll do
15 the book"; is that right?

16 A Yes.

17 Q And when he tells you that, what did you do
18 next?

19 A Well, not being a business person, I then
20 asked Leonardo to help me out with some stuff in
21 regards to this.

22 Q When you say "Leonardo," you mean Leonardo
23 Starke?

24 A Leonardo Starke.

25 Q And he is a lawyer?

1 A Yes.

2 Q And he was your father's lawyer on different
3 projects?

4 A On different projects.

5 Q Was he also your father's business associate,
6 involved in business deals with him?

7 A I guess so, yeah.

8 Q He was also a friend of the family's?

9 A Yeah.

10 Q You had known him for several years, and you
11 had known him to be a lawyer?

12 A Yes.

13 Q Is that why you went to him?

14 A Yes.

15 Q Do you recall the first conversation you had
16 with Mr. Starke about the book?

17 A I mean -- yeah.

18 Q What was it?

19 A "I need help. This book deal has come to me
20 to give to dad. How do I go about making it legit,"
21 covering myself in regards to -- I never had a
22 corporation before.

23 Q Your involvement with the book up until this
24 point in time was, Raffles brings the book idea to you?

25 A Right.

1 Q He says, "Can you bring this to your dad, put
2 it to your dad," you do, you have conversations going
3 back and forth. Your dad agrees to do the book. We
4 established it's his story.

5 At that point in time, is it fair to say that
6 you acted as a broker between your dad and Raffles to
7 broker that deal?

8 A Yeah, I guess so.

9 Q That's how I see it. I just want to make
10 sure you see it the same way.

11 A Yeah.

12 Q And so at that point in time your brothers
13 and sister weren't really involved in that arrangement;
14 they weren't talking to Raffles, they weren't talking
15 to your dad?

16 A No.

17 Q You were doing all that?

18 A Yeah.

19 Q But you expected, I presume, that you would
20 earn some compensation as a result of your efforts?

21 A Right.

22 Q And so in trying to decide how you would earn
23 that compensation, you went to Mr. Starke to ask him to
24 structure it in a way to help you?

25 A Yeah, to help me, to kind of deal with the

1 stuff that I don't know to do or ask for, so forth and
2 so on.

3 Q What were your concerns at that point in
4 time, as we just laid out the structure of what was
5 happening?

6 A Just concerns of what to ask, what not to
7 ask. Legally what do I do, how do I go about it, how
8 do I protect me. If I get money, how do I spread the
9 wealth with my brothers and sister.

10 I was ignorant to all that, very green to
11 that. So Leonardo had made suggestions, and really
12 just kind of helped me to just make it happen. From
13 there I just kind of gave it to him.

14 Q But you had done at least one deal prior with
15 your dad's name or likeness, and that was the video
16 game?

17 A Right.

18 Q You weren't concerned back then when that
19 deal was done?

20 A It was so simple. It was very simple. There
21 was a friend of mine that was involved in it. She has
22 her own company. I was like the broker. It was
23 simple. It wasn't like --

24 Q This one you viewed as more complicated?

25 A Yeah. Look where we are.

1 Q I'm assuming you didn't see this coming when
2 you set it up?

3 A By no means.

4 Q So you viewed this deal, the book deal, as
5 more complicated than the video deal?

6 A Most definitely.

7 Q You looked to Leonardo Starke to assist you
8 in structuring this corporation?

9 A Yes.

10 Q Did you also view that Mr. Starke was also
11 involved in trying to structure it from your father's
12 perspective?

13 A No.

14 Q Did you have an understanding as to whether
15 or not Mr. Starke was also representing your father in
16 connection with the book?

17 A I saw it as Mr. Starke representing me and my
18 brothers and sister, Lorraine Brooke. Me really,
19 because --

20 Q You did all the work?

21 A Yeah.

22 Q That's fair enough. I give money to my
23 siblings all the time. That's okay.

24 A Just trying to understand it, basically.

25 Q Do you know if your dad had a separate lawyer

1 assisting him in his aspects of this transaction?

2 A In the beginning, no.

3 Q Did there come a time when --

4 A As it went on, yes.

5 Q Who was that?

6 A He has so many lawyers. I couldn't tell you
7 exactly which one.

8 Q Was it Mr. Galanter who was involved in this
9 book transaction?

10 A I don't know.

11 Q But there was a lawyer at some point in time
12 that assisted your dad?

13 A I believe so.

14 Q And it wasn't Mr. Starke?

15 A Not to my knowledge, no.

16 Q Did you know whether Mr. Starke had
17 discussions with your father concerning the book, at or
18 around the formation of Lorraine Brooke Associates,
19 March of 2006?

20 A I don't know that.

21 Q Whose idea was it to actually form the
22 corporation?

23 A Mine and Leonardo.

24 Q When you went to Leonardo and said, "I have
25 this deal I'm brokering between Raffles and my dad --"

1 tell me if I'm wrong. I don't want to put words in
2 your mouth.

3 A Yeah, that's right.

4 Q Did he then say, "We should do it through a
5 corporation"?

6 A I believe he had kind of told me several
7 different things, but at the end of the day the
8 corporation made the most sense. Under the knowledge
9 that I'm not, you know, knowing everything, but just to
10 set it up where us four can benefit from it, yes.

11 Q What were some of the other options he gave
12 you, if you can remember?

13 A I can't remember everything, no.

14 Q Was there ever a discussion at this time as
15 to whether your father could be a shareholder of
16 Lorraine Brooke Associates?

17 A No.

18 Q No, there was never a discussion, or it was
19 decided he could not be a shareholder?

20 A Never a discussion.

21 Q Did you ever raise that as being a
22 possibility, him being a shareholder in Lorraine
23 Brooke?

24 A No.

25 Q Why not?

1 A Just being greedy. I didn't do all the
2 negotiating, but -- no.

3 Q It was your dad's story, right?

4 A Yes.

5 Q He was going to write the book?

6 A Right.

7 Q So you didn't think it was appropriate to
8 have him be a shareholder in the company that was going
9 to publish the book?

10 A No. From my understanding, Leonardo had
11 discussed -- actually, Leonardo and -- I don't know how
12 this worked, but either Leonardo and my father or
13 Leonardo and Raffles did the negotiating.

14 Q Over what?

15 A Over how the book would be done.

16 Q How the book would be done, or how Lorraine
17 Brooke would be involved in the book?

18 A How Lorraine Brooke would be involved in the
19 book.

20 Q So that was between Mr. Starke, your father,
21 and perhaps Raffles?

22 A Yes.

23 Q Were you involved in any of those
24 discussions?

25 A No.

1 Q But you know that they were discussing how to
2 structure the book in the context of Lorraine Brooke
3 Associates?

4 A No. They were trying to structure -- how can
5 I explain this?

6 Q Plain English.

7 A Basically, Lorraine Brooke -- how Lorraine
8 Brooke would get their share out of the book. I don't
9 know if I said that right.

10 Q I think I understand it.

11 You weren't part of those discussions?

12 A Well, I was, but I wasn't.

13 Q Did Mr. Starke or your dad come to you and
14 say, "This is how we're going to do it"?

15 A No. You know how negotiating goes. You go
16 back and forth. I believe Raffles had his concerns, my
17 father had his concerns, and Lorraine Brooke had their
18 own concerns.

19 Q What were Lorraine Brooke's concerns?

20 A What would we get out of this deal.

21 Q What were your dad's concerns?

22 A What would he get out of the deal.

23 Q That's why I --

24 A Separate.

25 Q That's why I asked the question. If everyone

1 was worried about what they would get out of the deal,
2 why wasn't it just done all through Lorraine Brooke
3 Associates? Why wasn't your dad a shareholder of
4 Lorraine Brooke Associates?

5 A Because we didn't want him in it.

6 Q Any particular reason?

7 A He structured his deal differently than what
8 we wanted.

9 Q How did he do that?

10 A I don't know exactly how that went down.

11 Q Were you concerned about all the litigation
12 that was pending surrounding your dad, for not having
13 him involved in Lorraine Brooke Associates?

14 A Say that again.

15 Q Bad question. You're right.

16 I'm trying to understand your concern for not
17 wanting your dad involved, and my question is, was it
18 the litigation that was surrounding your dad that led
19 you to not want him involved in Lorraine Brooke
20 Associates directly?

21 A I wanted it separate.

22 Q Fair enough. You wanted it separate for a
23 reason. I'm trying to understand whether one of those
24 reasons was, he was involved in other litigation. We
25 mentioned other litigation earlier today. We know

1 Mr. Goldman had litigation against him.

2 Did you want to be separate because of the
3 litigation, as one aspect of it?

4 A I didn't look at it that way, no. It was
5 just a corporation set up for us four kids to get
6 something out of the book in the long run.

7 Q Was there ever a discussion as to whether
8 your dad should just publish the book without Lorraine
9 Brooke Associates?

10 A I don't know how to answer that.

11 Q Well, in the prior deal you had not created a
12 corporation, and you had gotten a broker's fee, I think
13 you said.

14 Why couldn't, in this context, your dad have
15 published the book and paid you a broker's fee; you and
16 your brothers and sister?

17 A Because I saw it as an opportunity of being
18 way bigger than just a small broker's fee.

19 Q I didn't say the broker's fee had to be
20 small. It could be any size.

21 A I guess during the discussions with Leonardo,
22 the way that we negotiated how it would be set up, it
23 was kind of determined that way.

24 Q Principally, you wanted to be separated from
25 your father; you and your brothers and sister wanted to

1 be separate from your father in the context of this?

2 A Yeah.

3 Q I think you said that.

4 A Say that again. I'm confused now.

5 Q You and your brothers and sister wanted to be
6 separated from your father in the context of this deal?

7 A Yes.

8 Q And you don't know why -- maybe you do.

9 Do you know why your dad just didn't simply
10 publish it himself, and pay you and your brothers and
11 sister some money?

12 A It wasn't discussed that way. It just didn't
13 come up. I don't remember. Meaning with Leonardo, it
14 wasn't structured that way.

15 Q How was it structured, so I know?

16 A Well, I know Raffles wanted his money up
17 front, end of story.

18 Q How much was Raffles to get?

19 A I don't remember that number.

20 Q Do you know how he was to be paid?

21 A No.

22 Q It wasn't through Lorraine Brooke Associates,
23 was it?

24 A I don't know. I don't think so.

25 Q Would it have been directly from the

1 publisher?

2 A I don't know that.

3 Q Do you know whether your father paid him?

4 A I don't know that.

5 Q You don't know how he was paid?

6 A No.

7 Q You don't remember how much he was paid?

8 A I didn't concern myself with that.

9 Q How about your dad? What was his deal?

10 A I don't remember the exact setup. That's why
11 I relied on Leonardo to set that up.

12 I know that we had discussed us getting the
13 back end of the book, meaning once it was published, we
14 got paid that way, through book sales and having the
15 rights to the book.

16 Q Whose idea was it for you, Lorraine Brooke
17 Associates, to get the back end?

18 A Leonardo had discussed that.

19 Q Did he raise that with you as the way you
20 could get paid?

21 A Yes, or how to get paid, meaning setting up
22 the deal through Lorraine Brooke.

23 Q Leonardo was going to set the deal through
24 Lorraine Brooke?

25 A Yes.

1 Q Did Leonardo say to you, "I'll give you a
2 choice, you can get paid up front or you can get paid
3 in the back end"?

4 A We discussed like a lot of different things
5 during that time. We discussed a lot of things during
6 that time.

7 Q Was one of them whether you could be paid up
8 front?

9 A Yes.

10 Q And you didn't want to be paid up front?

11 A We did, but like I said, there's so many
12 discussions during that time, that it ended up being
13 that we would get paid at the end; it would be better
14 for us to get paid at the end of the book deal.

15 Q Why was it better for you to get paid at the
16 end of the book deal?

17 A Just because there would be more money.

18 Q No other reason?

19 A Depending on book sales.

20 Q Because it could have went the other way.

21 A I know, but I like to look at the glass half
22 full.

23 Q I appreciate that. But it could have went
24 the other way.

25 A Well, it did. Look where we are.

1 Q Were there any other reasons besides that
2 there was an opportunity to earn perhaps more money
3 down the road?

4 A Say that again.

5 Q Were there any other reasons why you would
6 get paid from the back end of the deal?

7 A Any other reasons why, no.

8 Q As I understand it, Lorraine Brooke
9 Associates was formed on March 22, 2006.

10 Is that your recollection?

11 A Yeah.

12 Q Let me give you a book. It looks worse than
13 it is. Turn to Tab Number 1.

14 (Thereupon, the said document was marked
15 as Exhibit No. 1 for identification by the
16 Reporter.)

17 BY MR. BATTISTA:

18 Q If you go to the second page of that tab, do
19 you recognize the Articles of Incorporation of Lorraine
20 Brooke Associates?

21 A It's a little different, but yes.

22 Q Is that Mr. Starke's signature on the bottom
23 of the second page and again on Page 3?

24 A Yes.

25 Q That is his signature?

1 A Yes.

2 Q Going back to the second page, it's file
3 stamped March 22, 2006.

4 A Yes.

5 Q Do you remember having any discussions with
6 what has been known as a ghostwriter for the book?

7 A Do I know -- say that again.

8 Q Did you have any discussions with the
9 ghostwriter for the book?

10 A No.

11 Q Who took care of that?

12 A I don't know that.

13 Q Was it your dad?

14 A I don't know that.

15 Q You don't know whether it was Leonardo
16 Starke?

17 A I don't know that.

18 Q Do you know whether an agreement was ever
19 signed with a ghostwriter?

20 A I don't know that.

21 Q Turn to Tab 15 for me. This is a letter
22 dated March 23, 2006, to Lorraine Brooke Associates,
23 from Pablo Fenjves; F-E-N-J-V-E-S.

24 Have you ever seen that letter before?

25 A I don't know if I've ever seen this.

1 (Thereupon, the said document was marked
2 as Exhibit No. 15 for identification by the
3 Reporter.)

4 BY MR. BATTISTA:

5 Q On the next page, is that Mr. Starke's
6 signature under Lorraine Brooke Associates?

7 A Yes.

8 Q Do you know Pablo?

9 A No.

10 Q Ever met him?

11 A No.

12 Q Do you know whether he was the person who was
13 going to ghostwrite the book with your dad?

14 A I don't know that.

15 Q Do you know what he was to be paid?

16 A No.

17 Q Given that Mr. Starke signed this, do you
18 think Mr. Starke would know?

19 A Yeah.

20 Q This was signed March 23, 2006.

21 That was one day after Lorraine Brooke
22 Associates was formed, right?

23 A Yeah.

24 Q If you go back to Tab 2, have you seen this
25 agreement before?

1 For the record, this is a contract between
2 Lorraine Brooke Associates, Inc. and HarperCollins
3 Publishers, dated May 8, 2006.

4 A Right.

5 (Thereupon, the said document was marked
6 as Exhibit No. 2 for identification by the
7 Reporter.)

8 BY MR. BATTISTA:

9 Q Do you recall seeing that?

10 A I might have been shown it. I get shown a
11 lot of things. Sometimes I look at it in detail,
12 sometimes I don't.

13 Q Look at Page 17.

14 Is that Mr. Starke's signature on Page 17
15 under Lorraine Brooke Associates? Is that his
16 signature?

17 A Yes, it is.

18 Q Did he have authority to sign this contract
19 for Lorraine Brooke Associates?

20 A Yes.

21 Q What was Mr. Starke's role with Lorraine
22 Brooke Associates when it was first formed?

23 A He was my lawyer, my confidant.

24 Q When you say "my," you mean Lorraine Brooke
25 Associates?

1 A Yeah. Sorry.

2 Q That's all right.

3 A He helped me out organizing it, and he was, I
4 believe, vice-president to it at some point.

5 Q Was he also a director, do you remember?

6 A I believe so, yes.

7 Q So when he signed this as vice-president, he
8 was the vice-president of the company at that time?

9 A Yeah.

10 Q Did you negotiate with HarperCollins any
11 portion of this contract?

12 A I left that up to Leonardo.

13 Q So he had full authority to negotiate this?

14 A Yes.

15 Q Did you give him any direction as to what to
16 say?

17 A What to say?

18 Q Did you give him any direction as to what you
19 wanted to see in the contract, the terms of the
20 contract?

21 A Just to make sure that we get our money at
22 the end of the book deal, to protect me, Lorraine
23 Brooke.

24 Q Protect Lorraine Brooke from what?

25 A In case somebody tries to come after us.

1 Making it legit, professional.

2 Q That's one of the areas I want to explore a
3 little bit.

4 You actually said, I think, at one point, to
5 protect you against lawsuits; is that right? Is that
6 one of your concerns?

7 A Yeah.

8 Q In the formation of Lorraine Brooke you
9 wanted to be protected against lawsuits?

10 A That and other things.

11 Q What other things?

12 A I don't know business, but I do know that
13 people -- things can happen, basically.

14 Q Were you worried about somebody trying to
15 take what was otherwise entitled to Lorraine Brooke
16 Associates in this book deal?

17 A Take?

18 Q We can use the words "seize" or "attach." We
19 can use any of those.

20 A Honestly, I just wanted to make sure that
21 things were legit, and that God forbid if anything
22 happened -- there's a lot of things I wouldn't foresee,
23 but just if anything happened, that it was done right.
24 Anything in regards to me or my brothers or sister,
25 anything.

1 Q Were you concerned about any particular
2 lawsuits at the time?

3 A No. I wasn't foreseeing anything.

4 Q Were you concerned that any of your dad's
5 creditors or adversaries might try to interfere with
6 Lorraine Brooke's rights to be paid?

7 A At the time, no.

8 Q Did you become concerned with that after the
9 fact?

10 A No.

11 Q Exhibit A to the document, Page 22 -- I'm
12 sorry, the same document, but Page 22.

13 A Uh-huh.

14 Q Have you ever seen this before?

15 A I believe so.

16 Q Is that your father's signature on the
17 bottom?

18 A Yes.

19 Q This is a document dated May 8, 2006,
20 attached to the HarperCollins contract, from your dad
21 to HarperCollins Publishers.

22 You think you've seen that before?

23 A Yeah, I think.

24 Q You testified your dad wasn't a shareholder
25 of Lorraine Brooke, correct?

1 A Correct.

2 Q He wasn't a director?

3 A No.

4 Q He wasn't an officer?

5 A No.

6 Q He wasn't an employee?

7 A No.

8 Q Couldn't sign checks?

9 A No.

10 Q He had no connection with Lorraine Brooke
11 Associates, other than he was your father and your
12 siblings' father?

13 A Yeah.

14 Q Did he have any other connection with
15 Lorraine Brooke?

16 A No.

17 Q You hesitated. That's why --

18 A I'm thinking, well, he wrote the book.

19 Q That is a connection. You're right.

20 A Is this a trick question?

21 Q I haven't asked trick questions in 20 years.
22 Don't worry about that. I'm just trying to understand
23 it.

24 So he signs this agreement, and in the very
25 first paragraph he says, "I represent to HC --"

1 HarperCollins -- "that LBA --" Lorraine Brooke -- "has
2 the right to enter into the agreement."

3 How would your father know whether LBA had
4 the right to enter into an agreement?

5 A Leonardo did all the negotiating for me.

6 Q So he would know the answer to that question?

7 A Yes.

8 Q And then it says, "and bind me --" meaning
9 your father -- "personally to the terms of the
10 agreement."

11 Do you know how LBA could bind your dad to
12 this agreement?

13 A I don't understand the word.

14 Q You don't know what that means?

15 A No. These little, fine details, I don't -- I
16 relied on my lawyer.

17 Q You relied completely on Mr. Starke to deal
18 with this?

19 A Yes, sir.

20 Q Did you have any discussions with your father
21 about this document?

22 A No.

23 Q Do you know whether HarperCollins required
24 this document from your father?

25 A No.

1 Q Do you know whether HarperCollins would have
2 done this deal with Lorraine Brooke Associates except
3 for this document?

4 A I don't understand that.

5 Q Let me try to put it a different way.

6 Your dad was writing the book; it was his
7 story.

8 A Right.

9 Q It wasn't a story of you or your siblings,
10 and it wasn't a story of LBA.

11 A No.

12 Q HarperCollins was going to publish this book.

13 Do you think HarperCollins would have
14 published this book without your dad agreeing directly
15 with HarperCollins?

16 A I don't know that.

17 Q When did your dad start writing the book?

18 This document was signed May of '06.

19 A Some time after May of '06.

20 Q Do you know how long it took to complete the
21 book?

22 A No.

23 Q Did you view the book idea as confidential?

24 A Confidential?

25 Q At the time these contracts were entered into

1 and you formed Lorraine Brooke Associates, was it your
2 view that this was confidential until it was completed
3 and could be announced to the world?

4 A Yeah.

5 Q I assume you did that in part for publicity
6 purposes and everything else?

7 A Right.

8 Q So no one outside the immediate family,
9 either Lorraine Brooke, your father, Raffles, that
10 group we talked about, knew about this brook?

11 A Not to my knowledge.

12 Q Do you know when it first became public?

13 A That would be very hard for me to answer.
14 No, I don't.

15 Q Would it have been late '06; the October,
16 November time frame?

17 A October, November, I don't know.

18 Q But it certainly wasn't immediate. If he
19 started writing it around May when the contract was
20 signed -- you don't really remember how long it took
21 him.

22 Did it take a couple of weeks, did it take
23 two or three months?

24 A I don't know. I travel a lot too, and I
25 work. I don't live there all the time. I don't watch

1 him like that. I have my own life.

2 Q But up to that point in time, you had
3 discussed the book with Raffles, you had discussed the
4 book with your dad, you discussed the book with your
5 siblings. You said you did not discuss it with the
6 Brown family.

7 A No, I did not.

8 Q Did you think about calling the Goldman
9 family and asking them about the book?

10 A No, I didn't.

11 Q Why not?

12 A I didn't.

13 Q I understand, but do you know why you didn't
14 call them?

15 A I didn't. I didn't think about it. Not to
16 be mean or anything like that. I just didn't.

17 Q Do you think they would have had an interest
18 in it?

19 A I don't know that. I would say no, just
20 because they don't like my father, but I don't know
21 that. That would be putting words in their mouth if I
22 said yes or no.

23 Q That's a fair answer.

24 You had said in one of your prior depositions
25 that your dad had to get his money up front. I think

1 that's what you said.

2 A Yes.

3 Q You don't remember the exact amount of
4 money -- I'm not asking about the exact amount -- but
5 he had to get his money up front.

6 A Correct.

7 Q Do you know why he wanted his money up front?

8 A No.

9 Q Do you know why he wasn't willing to wait to
10 get his money?

11 A No.

12 Q Do you know if Mr. Starke would know that?

13 A I don't know that. You'd have to ask him
14 that.

15 Q But Mr. Starke was the one negotiating the
16 deal?

17 A Yes, sir.

18 Q So we can assume he would know that?

19 A Yes.

20 Q Other than you acting as a broker between
21 Raffles and your father for the book, what else did
22 Lorraine Brooke Associates do in consideration of
23 getting that back-end payment?

24 A You would have to ask Leonardo that.

25 Q So you don't know what else Lorraine Brooke

1 Associates did?

2 A I don't know how to proceed with that kind of
3 stuff, so he was the one to guide this company and
4 facilitate what needs to be done and received.

5 Q You, yourself, other than discussing it with
6 Raffles and putting Raffles together with your father,
7 you didn't do anything else with respect to the book?

8 A Pardon me?

9 Q You didn't do anything else with respect to
10 the book, other than putting Raffles together with your
11 father, and having the discussions with Raffles and
12 having discussions with your father?

13 A And then having discussions about what I
14 would get out of the book deal, meaning we.

15 Q That was the extent of your involvement?

16 A I mean -- I'm not understanding the question.

17 Q I'm trying to understand. Lorraine Brooke
18 Associates is going to get the back end of this deal.
19 You described it as potentially a large amount of
20 money.

21 A Right.

22 Q Hopefully.

23 A Hopefully.

24 Q Yet it was your dad's book, your dad was
25 writing the book, there was a ghostwriter involved,

1 there was a separate publisher involved, HarperCollins,
2 correct?

3 A Right.

4 Q Lorraine Brooke Associates wasn't going to
5 publish the book?

6 A No.

7 Q So HarperCollins is going to publish the
8 book, your dad is going to write the book, the
9 ghostwriter is going to help him write the book,
10 Raffles came up with the idea, and you connected
11 Raffles with your father.

12 I'm trying to understand what else was done
13 by Lorraine Brooke Associates to entitle it to what
14 could potentially be a large amount of money on the
15 back end of the book. If there's nothing else out
16 there, that's fine. I'm just trying to understand what
17 else is out there.

18 A What else is out there?

19 Q What else did Lorraine Brooke do?

20 A I guess to make sure that everything ran
21 smooth and followed through.

22 Q Anything else you can think of?

23 A Not right now, no. I'm kind of confused with
24 the question.

25 Q I'll put it in an example form. I provide

1 legal services to my client, my client pays me for my
2 legal services.

3 A Uh-huh.

4 Q I'm trying to understand what kind of
5 services Lorraine Brooke provided in exchange for the
6 back-end payments.

7 A To make sure that the book deal flowed and
8 followed through, like a baby-sitter, make sure that
9 everything happened the way it's supposed to happen,
10 meaning like the writing is okay, everybody is happy.

11 To follow through. In order for it to follow
12 through, that's when we get our money, so we have to
13 make sure and watch over it, because we have a huge
14 investment into it.

15 Q What was the investment?

16 A That we get the rights to the book and get
17 paid at the end, like when the book gets published.

18 Q You said "huge investment."

19 A That's a huge investment to me.

20 Q It may be a huge asset to you, but did
21 Lorraine Brooke invest any money into the book?

22 A No, I don't think so.

23 Q You didn't pay the ghostwriter, to the best
24 of your knowledge?

25 A No.

1 Q You didn't pay any money to HarperCollins, to
2 the best of your knowledge?

3 A No.

4 Q You didn't pay any money to your father, to
5 the best of your knowledge?

6 A No.

7 Q You didn't pay any money to Raffles, to the
8 best of your knowledge?

9 A No.

10 Q So other than having the opportunity to make
11 this money at the end of the day, did Lorraine Brooke
12 invest anything in the form of cash or services or
13 property in this deal?

14 A No, not to my knowledge.

15 Q So when you said "huge investment," you meant
16 huge opportunity?

17 A Yeah.

18 Q You wanted to make sure that Lorraine Brooke
19 could seize on this potential huge opportunity?

20 A Right.

21 Q Did you have any discussions with your father
22 about the formation of Lorraine Brooke Associates?

23 A No.

24 Q Do you know whether Mr. Starke did?

25 A I don't know that.

1 Q Let me show you another document. It's the
2 licensing agreement that's been referred to on more
3 than one occasion. Let me see if you recognize it.
4 Turn to Tab 14.

5 (Thereupon, the said document was marked
6 as Exhibit No. 14 for identification by the
7 Reporter.)

8 BY MR. BATTISTA:

9 Q Do you recognize this document?

10 A Yes, I was shown this.

11 Q Shown it in the context of this bankruptcy,
12 or did you see it before this bankruptcy?

13 A It was -- yeah. I believe it's in my
14 corporation book.

15 Q This is a license agreement, non-exclusive,
16 dated April 11, 2006, between Orenthal James Simpson
17 and Lorraine Brooke Associates, correct?

18 A Yes.

19 Q That's your father?

20 A Correct.

21 Q On the second to last page, is that your
22 signature for Lorraine Brooke Associates?

23 A Yes.

24 Q Is that your father's signature next to it?

25 A Yes.

1 Q Did you negotiate this agreement with your
2 father?

3 A Leonardo.

4 Q Mr. Starke did?

5 A Yes.

6 Q Did you review it before you signed it?

7 A Yes.

8 Q Did you have any discussions with your father
9 concerning this agreement before you signed it?

10 A No.

11 Q Do you know whether Mr. Starke had any
12 discussions with your father before it was signed?

13 A I don't know that.

14 Q So as far as you know, Mr. Starke asked you
15 to sign this agreement and you signed it?

16 A Yeah. I always look over stuff. Sometimes I
17 don't completely 100 percent understand everything, but
18 I trust Leonardo. That's why I hired him. And so yes.

19 Q I just want to make sure I understand the
20 extent of your knowledge of this agreement.

21 (Discussion off the record.)

22 BY MR. BATTISTA:

23 Q Back to the license agreement, you had no
24 discussions or negotiations with your father concerning
25 this agreement, correct?

1 A Correct.

2 Q Is this the agreement, by the way, that you
3 believe gave Lorraine Brooke Associates the rights to
4 the book?

5 A Oh, God. I would have to really read this.

6 Q Do you know, other than reading it right now?

7 A I don't know that.

8 Q I just wanted to see if you knew. You don't
9 have to read it right now.

10 Do you see the last page of the agreement,
11 Exhibit A?

12 A Yes.

13 Q Do you know what that is?

14 A Payments.

15 Q Payments from whom to whom, if you know?

16 A I believe Lorraine Brooke to Mr. Simpson.

17 Q Where was this money going to come from?

18 A I believe it came from HarperCollins.

19 Q So your understanding is, HarperCollins was
20 going to do what with the money?

21 A I don't know. That's why I'm saying, you
22 have to get to Leonardo. He handled all this stuff for
23 me.

24 Q I tried, by the way. That's not for you to
25 worry about. That's a different issue.

1 You believe that these are payments that were
2 going to be made to your father, and the money was
3 going to come from HarperCollins?

4 A I don't remember exactly the structure, to be
5 really honest with you, but I just know that Leonardo
6 took care of everything in regard to everything.

7 There were things he told me that went in one
8 ear and out the other, unfortunately. You know what I
9 mean?

10 Q Understood.

11 Did you understand that any of the money
12 concerning this book was going to come from
13 HarperCollins?

14 A Pardon me?

15 Q Was it your understanding that whatever money
16 that was to be made from this book was going to come
17 from HarperCollins?

18 A From the sale of the book, yes, if I
19 understand the question right.

20 Q I'm trying to understand what your
21 understanding is, as to where the money was going to
22 come from from this book, whether it was sales or
23 promotions or whatever was going to happen with the
24 book.

25 Is that --

1 A I believe so, yes.

2 Q The contract was between HarperCollins and
3 Lorraine Brooke Associates, as we identified in Exhibit
4 2, right?

5 A Uh-huh.

6 Q Do you know why HarperCollins didn't just do
7 a contract directly with your father?

8 A No, I don't.

9 Q You said that your father had negotiated his
10 separate deal with HarperCollins on what he was going
11 to get; is that right?

12 A I believe so. I don't know that completely,
13 but I believe so.

14 Q Your understanding is that he negotiated with
15 HarperCollins?

16 A Correct.

17 Q For his piece?

18 A I believe so.

19 Q You didn't do it?

20 A No, I didn't do it.

21 Q I think you testified before -- and I don't
22 want to put words in your mouth -- that he went to
23 HarperCollins and negotiated his deal?

24 A I thought so, yes.

25 Q Do you know why he wouldn't have provided for

1 HarperCollins to pay him directly?

2 A No, I don't.

3 Q You don't know why HarperCollins paid
4 Lorraine Brooke, who then in turn was supposed to pay
5 him?

6 A I don't remember the structure of it, no.

7 Q You don't know why it was structured that
8 way?

9 A No.

10 Q Do you see any reason why HarperCollins could
11 not have paid him directly?

12 A No. I don't know.

13 Q They could have, right?

14 A I guess so, yeah.

15 Q Did it concern you at all?

16 A To be honest with you, no.

17 Q Other than the license agreement, Exhibit 14,
18 is there any other agreement that you know of between
19 Lorraine Brooke and your father?

20 A Offhand, I couldn't tell you that.

21 Q You're not aware of any?

22 A No.

23 Q Was there any agreement that Lorraine Brooke,
24 for instance, would pay any of your father's bills with
25 money it received?

1 A Leonardo would know that.

2 Q But you don't know that?

3 A I recall it, yeah, but I don't remember how
4 exactly it went. I believe the money came to us, and
5 then we paid out the bill directly, something on the
6 lines of that.

7 Q That's what I'm trying to understand.

8 A You would have to go to Leonardo Starke to
9 get the details of that. I don't remember.

10 Q You weren't involved in it?

11 A I was involved in it, but I let him do
12 everything.

13 Q Do you recall having a discussion with your
14 father about whether Lorraine Brooke --

15 A No. I didn't talk to him about that;
16 Leonardo Starke.

17 Q I have to finish my question.

18 A I'm sorry.

19 Q I know you know where I'm going, but let me
20 finish.

21 Did you have any discussions with your father
22 about Lorraine Brooke paying any of his bills with this
23 money?

24 A I don't know how to answer this. Not that
25 I'm trying to find something to say.

1 Leonardo -- like I said, I always go through
2 Leonardo Starke.

3 I don't know how to explain this. I remember
4 hearing of it, and Leonardo dealing with it.

5 Q Do you remember someone told you that that's
6 what's going to happen?

7 A Making arrangements through the business, but
8 Leonardo knows the details of it. I would be lying if
9 I say I remember.

10 Q I don't want you to lie. I don't want you to
11 guess either.

12 A That's what I'm trying to say. I don't want
13 to guess. But I do recall.

14 Q You recall somebody telling you that this is
15 how it's going to work, but you don't recall who told
16 you?

17 A It's not who, it's -- no, I don't recall.
18 I'm fumbling now and I can't get my thoughts right.

19 Q But you had an understanding that this was
20 going to happen this way?

21 A Yes.

22 Q And Leonardo would have the details?

23 A Yes.

24 Q As to why it was structured that way?

25 A Correct.

1 Q Just like Leonardo would have the details as
2 to why Lorraine Brooke was structured the way it was
3 for this deal?

4 A Correct.

5 Q I may have asked this, and I apologize.

6 Was there ever a discussion with your father,
7 directly or indirectly, as to why the money he was to
8 be paid up front wouldn't be split with Lorraine Brooke
9 Associates?

10 A Split?

11 Q Under this agreement he was going to get
12 \$630,000, I believe. That's the license agreement. I
13 think you testified that he was negotiating that with
14 HarperCollins directly, and he was going to get his
15 money up front.

16 Is that all true?

17 A Yeah.

18 Q So I'm wondering --

19 A I don't remember the details of everything.

20 Q Let's take it one step at a time.

21 I think you said that he was negotiating with
22 HarperCollins over the money to be paid to him?

23 A I believe so, yeah.

24 Q And we've identified that that amount of
25 money is \$630,000, which is on the attachment to the

1 license agreement; is that right?

2 A I believe so.

3 Q If that's not right, tell me.

4 A I don't know.

5 Q You don't know what deal he cut with
6 HarperCollins?

7 A I don't know the details of it, no.

8 Q So whatever the deal was he cut with
9 HarperCollins, the question I have is, was there any
10 discussion with him as to whether, whatever money he
11 was going to get, he would split, 10 percent,
12 90 percent?

13 A Me personally, I don't know that.

14 Q You didn't have any discussions with him?

15 A No, I did not.

16 Q You said that one of the things, or the
17 principal thing Lorraine Brooke did, besides make an
18 introduction between Raffles and your father, was to
19 make sure everything ran smoothly, and to make sure the
20 book got published and everything else.

21 Any reason why your dad couldn't have done
22 that?

23 A Say that again.

24 Q Is there any reason why your father could not
25 have made sure everything went smoothly in getting the

1 book published?

2 A I don't know that.

3 Q I'm wondering whether something prohibited
4 him from doing that?

5 A Not that I know of, but you'd have to ask
6 him.

7 Q I tried that, too.

8 You mentioned in one of your depositions, in
9 addition to Raffles, another man named Bruce.

10 Do you remember Bruce's name?

11 A Bruce? I don't know a Bruce.

12 Q Brett. I'm sorry.

13 There were two guys involved in the book
14 deal. Raffles was one and --

15 A Brett.

16 Q Do you remember Brett's last name?

17 A Saxon.

18 Q He's the guy with TMP, the agent?

19 A I believe so, yeah.

20 Q Do you know what his deal was?

21 A No. I referred Leonardo to deal with all
22 that.

23 Q Going back to the moneys that were paid by
24 HarperCollins to Lorraine Brooke and then paid out to
25 your father, did that cause you any concern that that

1 money from HarperCollins was being funneled through
2 Lorraine Brooke Associates?

3 A I'm sorry. Say that again.

4 Q The money that was coming from HarperCollins
5 for the book into Lorraine Brooke Associates and then
6 paid out to your father in various forms, did that
7 cause you any concern, that structure?

8 A No.

9 Q Who handled the banking relationship for
10 Lorraine Brooke Associates?

11 A Leonardo.

12 Q Were you a signatory on the bank account, as
13 well?

14 A Yes.

15 Q Was there only one bank account?

16 A Yes.

17 Q That was at Bank of America?

18 A Correct.

19 Q Did Mr. Starke handle the checkbook?

20 A Yes.

21 Q So Mr. Starke made the decisions as to who to
22 pay, who not to pay?

23 A Yeah. Both of us.

24 Q Did you say "both of us"?

25 A Yes. I mean, we discussed things.

1 Q So he would ask you permission before he did
2 something?

3 A Yeah. I mean, sometimes, yeah.

4 Q He could do it on his own if he wanted to?

5 A Yeah. I trusted him.

6 Q Go to Tab 3-D as in "dog." This is a
7 one-page document, dated November 16, 2006.

8 (Thereupon, the said document was marked
9 as Exhibit No. 3 for identification by the
10 Reporter.)

11 MR. BATTISTA: I'm sorry. You can have a
12 full set. They're sitting here. I should have given
13 to them to you earlier. I apologize.

14 BY MR. BATTISTA:

15 Q This is from a Rob Stein.

16 Do you know Rob Stein?

17 A No.

18 Q TMP, Transactional Marketing Partners, was
19 that the company Brett Saxon was with?

20 A I don't know exactly, but I know he has a
21 company.

22 Q This appears to be a letter directed to
23 Mr. Starke for Lorraine Brooke Associates, enclosing a
24 check in the amount of \$340,000.

25 Do you see that?

1 A Yes.

2 Q Do you ever recall seeing this?

3 A I don't recall.

4 Q Go to the next page of that exhibit. It
5 looks like an e-mail from Mr. Stein to Mr. Starke, and
6 it says, "Hi Leonardo. I just returned from the bank
7 after making the deposit into Lorraine Brooke
8 Associates' account. I've attached a copy of the
9 check, the deposit slip and a letter confirming the
10 calculation."

11 Do you see that?

12 A Yes.

13 Q Did you ever see this before?

14 A No.

15 Q Do you know why Mr. Stein, who's located in
16 Santa Monica, California, is depositing money into the
17 Lorraine Brooke Associates bank account?

18 A No, I don't.

19 Q Does that concern you?

20 A I don't know. I mean, I trusted Leonardo,
21 so --

22 Q Do you know how Mr. Stein got a deposit slip
23 for Lorraine Brooke Associates?

24 A You'd have to ask Leonardo that.

25 Q Then if you turn to the next page, do you see

1 a check for \$340,000 from Transactional ERA to Lorraine
2 Brooke Associates?

3 A Yes.

4 Q Is that the check being referred to in the
5 first two pages?

6 A Yes.

7 Q Then we have the deposit slip, which is the
8 next document. It looks like Bank of America. I can't
9 read the account number, but I believe it would be into
10 Lorraine Brooke's account.

11 A Correct.

12 Q That's on November 16, 2006. Let's jump over
13 now to Tab 16.

14 (Thereupon, the said document was marked
15 as Exhibit No. 16 for identification by the
16 Reporter.)

17 BY MR. BATTISTA:

18 Q Do you see that?

19 A Yes.

20 Q This is a schedule of receipts and
21 disbursements that Mr. Starke gave to us in discovery.

22 Do you recognize this?

23 A Yes.

24 Q And what is this showing?

25 A Receipts, and where the money was

1 distributed.

2 Q Receipts would have come from where?

3 A From Lorraine Brooke.

4 Q These are receipts into Lorraine Brooke, but
5 do you know where they would have come from?

6 A I believe HarperCollins.

7 Q If you go to the last item on the first page,
8 \$340,000, November 16, 2006, is that the same \$340,000
9 that we referred to in Exhibit 3-D?

10 A I believe so, yes.

11 Q We just established that was deposited by
12 Mr. Stein directly into Lorraine Brooke's account in
13 California on November 16, 2006, right?

14 A Uh-huh.

15 Q It looks like on the same day, on
16 November 16th, a check was written to Washington Mutual
17 for \$250,000 for the benefit of Mr. Simpson, and to the
18 IRS for \$150,000 for the benefit of Mr. Simpson.

19 A Correct.

20 Q Do you know why those checks were written
21 almost immediately upon the receipt of the money?

22 A No.

23 Q Mr. Starke would know that?

24 A Yes.

25 Q Do you know of any other instance in which

1 anybody else deposited money, other than you or
2 Mr. Starke, directly into Lorraine Brooke's account?

3 A I don't know that. You would have to refer
4 to Mr. Starke.

5 Q Let's go to Number 17.

6 (Thereupon, the said document was marked
7 as Exhibit No. 17 for identification by the
8 Reporter.)

9 BY MR. BATTISTA:

10 Q Do you recognize these pages?

11 A Yes.

12 Q These are what?

13 A Receipts.

14 Q For what?

15 A Checks.

16 Q From whom?

17 A From Lorraine Brooke.

18 Q To various payees?

19 A Correct.

20 Q If we go to the second page, check 1157, do
21 you see that?

22 A Yes.

23 Q It's dated November 15, 2006.

24 Who is it payable to?

25 A Mr. Simpson.

1 Q Is it payable to cash?

2 It says "To" and someone handwrote in "cash."

3 A Yes.

4 Q Then it says, "For: Simpson publishing
5 draw."

6 A Yes.

7 Q Do you understand that's a check payable to
8 cash?

9 A Yes.

10 Q Let's go to Number 18.

11 (Thereupon, the said document was marked
12 as Exhibit No. 18 for identification by the
13 Reporter.)

14 BY MR. BATTISTA:

15 Q Do you see that?

16 A Yes.

17 Q Do you know what that is?

18 A Yes.

19 Q What is it?

20 A A receipt.

21 Q From whom?

22 A Lorraine Brooke.

23 Q Signed by whom?

24 A By O.J., Mr. Simpson.

25 Q Dated 11-15-06?

1 A Yes.

2 Q The amount was how much?

3 A 20,000.

4 Q Which box is checked in the middle of that,
5 cash, check or money order?

6 A Cash.

7 Q What does this tell you?

8 A What do you mean what does this tell me?
9 That he got cash.

10 Q Of \$20,000?

11 A Yes.

12 Q Do you know why Lorraine Brooke gave \$20,000
13 in cash to Mr. Simpson?

14 A I don't remember that.

15 Q Were you involved in that at all?

16 A You'd have to ask Mr. Starke.

17 Q Were you involved in that?

18 A I believe I was told, but like I said, I
19 always let Mr. Starke handle everything.

20 Q You don't know why he was given --

21 A I don't recall why, no.

22 Q Does your father have a bank account?

23 A I assume so, yes.

24 Q Do you know?

25 A I don't know that, no.

1 Q Do you know why a check just wasn't made
2 payable to your father for \$20,000?

3 A I don't.

4 Q Did it seem odd to you that \$20,000 in cash
5 was given to your father?

6 A I don't know.

7 Q That's a lot of money, isn't it?

8 A Yeah, but I don't know. You'd have to talk
9 to Mr. Starke in regard to the circumstance of that.

10 Q I'm not sure I've ever seen 20,000 in cash,
11 but I assume it's pretty thick.

12 A I guess.

13 Q That was Mr. Starke's decision and it didn't
14 concern you?

15 A No, it didn't.

16 Q Is that because you viewed this money that
17 came in from HarperCollins as Mr. Simpson's money and
18 not Lorraine Brooke's?

19 A Mr. Simpson's money and not Lorraine
20 Brooke's, yes. Well, I'm not understanding.

21 Q I'm trying to understand it.

22 Mr. Simpson negotiated his own deal with
23 HarperCollins to get his money up front?

24 A Right.

25 Q We established that that was perhaps as much

1 as \$630,000.

2 A Okay.

3 Q Is that right?

4 A I guess.

5 Q Whatever the number was.

6 A Right.

7 Q And we established that it was paid into
8 Lorraine Brooke's account.

9 A Correct.

10 Q So when it was paid into Lorraine Brooke's
11 account, did you think it was Lorraine Brooke's money?

12 A No.

13 Q So you must have assumed it was your father's
14 money?

15 A Correct.

16 Q Do you know why, if it was your father's
17 money, it was paid into Lorraine Brooke's account, as
18 opposed to into your father's bank account?

19 A No, I don't know that.

20 Q Did you ever ask that question to Mr. Starke
21 or your father?

22 A No, I didn't.

23 Q Did it cause you any concern that Lorraine
24 Brooke's account was being used for your father's
25 money?

1 A I didn't know that. I mean, I didn't -- I
2 don't know how to answer that.

3 Say that again.

4 Q Did it cause you any concern that Lorraine
5 Brooke's bank account was being used to deposit your
6 father's money?

7 A I don't know that it was being used to
8 deposit.

9 Q Was being used to hold your father's money?

10 A I don't remember the terms of whatever was
11 negotiated between Lorraine Brooke -- meaning Leonardo
12 helping me -- and HarperCollins and Mr. Simpson.

13 Q I appreciate that. You testified to that.
14 I'm not trying to make you guess about that.

15 This is your company, correct?

16 A Yes.

17 Q You're the president?

18 A Yes.

19 Q And you were a signatory on this bank
20 account?

21 A Right.

22 Q And you testified that your father cut his
23 own deal with HarperCollins to receive his money up
24 front, correct?

25 A Correct.

1 Q You testified that that money that was to go
2 to your father went into Lorraine Brooke's bank
3 account, correct?

4 A I think so.

5 Q You think so?

6 A I'm confused now. You're confusing me.

7 Q I'm not trying to trick you.

8 A I know you're not.

9 Q I'm just trying to establish your
10 understanding.

11 This money that we just identified, all the
12 receipts that we just identified, came into Lorraine
13 Brooke's bank account, and it was your understanding
14 that it was not Lorraine Brooke's money, it was your
15 father's money, correct?

16 A Correct.

17 Q So I asked you, did it concern you at all
18 that Lorraine Brooke's bank account was being used to
19 hold and disburse your father's money?

20 A No.

21 Q That's fine.

22 A But once again, I don't remember the terms
23 that Leonardo set up.

24 Q You don't know what deal Leonardo cut with --

25 A How we negotiated it.

1 Q When you say "we," you mean Lorraine Brooke?

2 A Leonardo, and the details of everything.

3 Q When you say "negotiated," you mean the deal
4 that was reached between Leonardo and your father?

5 A Well, Harper, Leonardo and my father.
6 Lorraine Brooke is the company that's supposed to --
7 everybody is negotiating everything, so Lorraine Brooke
8 is also in there getting the back end of this book and
9 the rights.

10 Q I understand that, but I'm only focusing on
11 the money that went into Lorraine Brooke's account,
12 whether it caused you any concern, and you said no, it
13 didn't. Fair enough. Then you went on to say it was
14 negotiated.

15 I simply want to know, negotiated between
16 whom and whom? Was it between Mr. Starke and your
17 father, as to how and why Lorraine Brooke's bank
18 account would take receipt of your father's money and
19 then disburse your father's money?

20 A Yes.

21 Q Which explains why you didn't really care why
22 \$20,000 in cash was handed to your father out of
23 Lorraine Brooke's account.

24 A It not that I didn't care.

25 Q It didn't concern you.

1 A Right.

2 Q Bad choice of words. I'm sorry.

3 It didn't concern you, right?

4 A But then I don't remember a lot of things.

5 I'll probably leave here and say, "Oh, shot, I remember
6 we did talk about this or that."

7 It's so overwhelming for me. That's why I
8 rely on Leonardo.

9 Q Back to Tab 17, the second page, do you see
10 check 1160, payable to Washington Mutual?

11 A Yes.

12 Q That's \$250,000.

13 Did you know that Lorraine Brooke had written
14 a check to Washington Mutual for \$250,000 on November
15 16, 2006?

16 A I've seen all these, so yes.

17 Q But before you saw it today or in connection
18 with this bankruptcy, did you know when it happened, on
19 November 16, 2006?

20 A Maybe, yeah. I don't recall.

21 Q Do you know why that money was paid to
22 Washington Mutual?

23 A You would have to ask Mr. Starke.

24 Q You don't know?

25 A No. I don't remember why.

1 Q Do you know whether it was used to pay down
2 the mortgage on Mr. Simpson's home?

3 A No. I don't know that.

4 Q Check 1161, payment to the IRS, Department of
5 Treasury, \$150,000, do you know why that check was
6 written?

7 A Obviously, to send to the IRS.

8 Q Well, yes, but other than that, do you know
9 why that was written?

10 A No.

11 Q Do you know whether it was to pay past due
12 taxes?

13 A I don't know.

14 Q Was it to pay Lorraine Brooke's taxes?

15 A I don't know. You'd have to ask Leonardo
16 that.

17 Q You don't recall Lorraine Brooke having a tax
18 obligation that big, do you?

19 A I don't recall.

20 Q You don't know?

21 A I don't recall.

22 Q Mr. Starke would know?

23 A Yes.

24 Q Why wasn't your father a signatory on the
25 Lorraine Brooke bank account, do you know?

1 A Why wasn't he?

2 Q Yes.

3 A Because he's not Lorraine Brooke.

4 Q I understand that, you testified to that, but
5 his money was deposited into Lorraine Brooke's account,
6 and a lot of his bills were paid from Lorraine Brooke's
7 account.

8 My natural question is, do you know why he
9 wasn't a signatory?

10 A No, I don't know. Because he doesn't need to
11 be.

12 Q Why is that?

13 A Because he's not part of Lorraine Brooke.

14 Q To repeat, he wasn't a signatory on the bank
15 account, because he wasn't part of Lorraine Brooke?

16 A No.

17 Q Other than the money that came in that we've
18 identified on Exhibit 16, the receipts that you
19 discussed came from HarperCollins, did Lorraine Brooke
20 get any other moneys?

21 A Any other moneys?

22 Q Yes.

23 A I believe yes, there was, but I don't
24 remember exactly how it came about.

25 Q Do you know how much, roughly?

1 A No. I don't remember that.

2 Q Was there another deal that Lorraine Brooke
3 was doing?

4 A Not to my knowledge, no.

5 Q Was it doing any other business besides this
6 book deal?

7 A During it, no.

8 Q Have you had any discussions with your father
9 about the fact that this book is not going to be
10 published?

11 A Say that again.

12 Q Prior to the filing of the bankruptcy, did
13 there come a time when HarperCollins decided not to
14 publish the book?

15 A Yes.

16 Q That was about when, do you remember?

17 A I want to say -- I'm so bad with time frames.

18 Q Around Thanksgiving maybe of 2006?

19 A Yeah, around the end of last year.

20 Q How did you react to that?

21 A Mixed.

22 Q What does that mean?

23 A I was relieved and then upset.

24 Q Relieved because?

25 A Just because anything that he does is a lot,

1 and personally, being related to him, and him being my
2 father, I have concerns. I care for him.

3 Q You say "anything he does is a lot." I don't
4 understand what that means.

5 A His name is O.J. Simpson, infamous from a
6 trial we all know about. It is what it is. There's
7 nothing else to be said about it.

8 In saying that, you just never know. Most
9 people in the media will say that it's all bad, but
10 that's not what I've always seen. So it's very down
11 the middle.

12 When I say a relief, to a certain degree,
13 because you just don't know how people are going to
14 react. You don't know how the media is going to spin
15 it. You don't know if people have let it go or don't
16 care about it anymore. You just don't know.

17 Q Were you concerned about more litigation
18 coming as a result of the book being published?

19 A I didn't think about that, no. I really
20 didn't.

21 Q Then you said you were upset.

22 You were upset why?

23 A Because I was concerned about how we were
24 going to get paid.

25 Q So when the decision came out that the book

1 wasn't going to be published, you were concerned --

2 A What does that mean for Lorraine Brooke.

3 Q Did you have any discussions with anyone
4 about that?

5 A Yeah, Leonardo.

6 Q What did you talk about?

7 A How does it work? Where do we go from here?
8 What are the steps that we take? Will it change? What
9 are our options?

10 Q What did he say?

11 A A lot of things. We can maybe renegotiate
12 with HarperCollins, or maybe somebody else might want
13 to buy the book, or maybe we should just let it go.
14 Maybe we'll wait a year and then rerelease it. A lot
15 of things came up.

16 Q Did you have any discussions with your father
17 about it?

18 A Yeah.

19 Q What did you tell him?

20 A He told me that the book wasn't going to be
21 done.

22 Q Based upon HarperCollins saying it wasn't
23 going to be published?

24 A Yeah.

25 Q How did you react to him?

1 A Nothing.

2 Q Did you say to him, "Dad, I'm not going to
3 get any money out of this, so can you give me some
4 money that you got up front," as an example?

5 A How did I react to him? That's a good one.
6 It's so natural. You don't think about it.

7 Yeah, I know that I was like, "I need to talk
8 to Leonardo to see what that means for me."

9 Q Did your dad offer to give some of the money
10 that he had gotten up front to Lorraine Brooke?

11 A No.

12 Q You said that kind of laughingly.

13 A No, he didn't.

14 Q Did you ask him?

15 A No.

16 Q Do you think he would have said yes or no?

17 A Knowing him, and he loves us, he probably
18 would have said yes.

19 Q Why didn't you ask him?

20 A Because I was waiting to see what was going
21 to happen, where are we going to go from here. With
22 the hoopla and the media putting a spin on it, you have
23 to let it sit for a minute and see what happens.

24 Q Did you call up Raffles and ask Raffles to
25 pay back some of the money he got?

1 A No. I wasn't thinking that way, no.

2 Q All you knew is that Lorraine Brooke wasn't
3 getting what you thought it was going to get?

4 A Yeah. I had plans.

5 Q You had plans?

6 A Yes.

7 Q What were those?

8 A Just to buy a house, buy my mom a house, help
9 her out, just things that you want to do in life. You
10 get a lump sum of money, you're able to do those
11 things; invest, travel, start my own company.

12 Q You had your own company.

13 A Meaning wardrobe stylist.

14 Q Different business?

15 A Different business, yes.

16 Q Does your father charge you rent to live at
17 the house?

18 A No.

19 Q Any of your brothers and sister?

20 A No.

21 Q Does he pay all the bills at the house?

22 A Pretty much, but I'm there off and on.

23 Q I know you work.

24 A I go to L.A. a lot and spend time there.

25 Then you also have to realize that Justin and

1 Syndey are in school. So they're off and on, too.

2 Q Does he pay their tuition?

3 A I don't know that.

4 Q Do they work, either one of them?

5 A No.

6 Q You don't pay their tuition, do you?

7 A No.

8 Q Would you assume that your dad pays their
9 tuition?

10 A I don't know that. I know they have their
11 own money, too. So I don't know that.

12 Q Does your dad ever give you money?

13 A He's loaned me money.

14 Q Have you paid him back?

15 A Yes.

16 Q How much has he loaned you?

17 A Like he'll pay my airfare, then I'll go to
18 L.A., work, give him back the money.

19 Q Not large amounts of money?

20 A No, not really. Not that I can recall right
21 now. I try to earn my way there, help out.

22 Q I appreciate that. Let's take a moment and
23 sort of flip through the rest of these exhibits. Let's
24 start with Exhibit 3. We've already gone through
25 Exhibits 1 and 2. Take a look through Exhibits 3-A, B

1 and C. We already looked at D.

2 Do you recognize these?

3 A I might have seen them. I don't recall.

4 Q Do you know what they are?

5 A To look at them, I would have to say they're
6 checks, copies of letters of -- copies of -- not
7 copies -- checks from HarperCollins.

8 Q Would these be moneys that would be payable
9 to Lorraine Brooke Associates?

10 A Yes.

11 Q Same for A, B and C?

12 A Yes, sir.

13 Q We already talked about D. Let's look at
14 Number 4.

15 (Thereupon, the said document was marked
16 as Exhibit No. 4 for identification by the
17 Reporter.)

18 BY MR. BATTISTA:

19 Q Do you know what Number 4 is?

20 A Washington Mutual.

21 Q Check drawn on Lorraine Brooke Associates?

22 A Correct.

23 Q July 24, '06?

24 A Correct.

25 Q \$70,000?

1 A Correct.

2 Q Payable to Washington Mutual?

3 A Correct.

4 Q Is that Mr. Starke's signature?

5 A Correct.

6 Q In the memo section it says, "O.J. Simpson
7 equity credit line."

8 Do you see that?

9 A Correct.

10 Q Is this another check from Lorraine Brooke to
11 pay Mr. Simpson's bill?

12 A Correct.

13 Q And again, you think that's because it was
14 Mr. Simpson's money?

15 A Pardon me?

16 Q Do you think that's because this is Mr.
17 Simpson's money?

18 A Correct.

19 Q Same thing with 4-A. I apologize. It's a
20 little hard to read.

21 Do you recognize that?

22 A No.

23 Q This appears to be a cashier's check or bank
24 check drawn on Bank of America for \$70,000, payable to
25 Washington Mutual.

1 A Correct.

2 Q Do you know if that is the same \$70,000 as in
3 the first check in Exhibit 4?

4 A I don't know that.

5 Q You don't know whether your father took the
6 check from Lorraine Brooke Associates, 1151 for
7 \$70,000, and converted it into a cashier's check?

8 A I don't know that.

9 Q If you don't know, you don't know.

10 A No, I don't know that.

11 Q Let's go to Number 5.

12 (Thereupon, the said document was marked
13 as Exhibit No. 5 for identification by the
14 Reporter.)

15 BY MR. BATTISTA:

16 Q This is a declaration of Arnelle Simpson.

17 Is that your signature on the second page?

18 A Yes.

19 Q Do you recall signing this?

20 A Yes.

21 Q This was signed in connection with what?

22 A This is, I believe, in regards to Lorraine
23 Brooke. It's some of the stipulations of it.

24 Q Do you have an understanding as to why you
25 signed this?

1 A A complete understanding?

2 Q Yes.

3 A Right now, no.

4 Q Was this in connection with litigation that
5 was going on in California against your father and
6 Lorraine Brooke concerning the book?

7 A I do remember that going on, but I don't know
8 if this is in regard to that.

9 Q Were you aware of litigation going on between
10 Mr. Goldman, your father and Lorraine Brooke, in or
11 around March or April of 2007, just this year?

12 A Yes.

13 Q Have you ever heard of the surrogate order?

14 A Yeah. I have been hearing that a lot lately.

15 Q Do you know if this declaration was being
16 given in connection with that surrogate order?

17 A My understanding is that there was something
18 out in Los Angeles in regard to O.J -- Mr. Simpson --
19 Lorraine Brooke and the Goldmans. My true knowledge of
20 it, I don't understand, but I do know that there was a
21 ruling on something with regards to the three, and
22 that's why we are where we are now.

23 I don't know the details, but in layman's
24 terms --

25 Q Fair enough. Next one is Number 6.

1 (Thereupon, the said document was marked
2 as Exhibit No. 6 for identification by the
3 Reporter.)

4 BY MR. BATTISTA:

5 Q This is another declaration of Arnelle
6 Simpson. I don't have a signature page, so I'm going
7 to skip that.

8 Let's go to Number 7.

9 (Thereupon, the said document was marked
10 as Exhibit No. 7 for identification by the
11 Reporter.)

12 BY MR. BATTISTA:

13 Q This is a declaration of Arnelle Simpson.

14 Is that your signature on the bottom of the
15 first page?

16 A Yes, sir.

17 Q Do you know what this was in connection with?

18 A I'll have to read it to know.

19 Q You can take a moment. It's not very long.

20 A This is in regards to Lorraine Brooke, and I
21 believe -- I guess the case that was pending in Los
22 Angeles.

23 Q Do you know if this was in connection with
24 the surrogate order?

25 A I'm still not really understanding this whole

1 surrogate thing.

2 Q If you look on Item 3 on your affidavit you
3 said, "I make this declaration as a part of LBA's ex
4 parte application to vacate the assignment order and
5 the restraining order of March 13, 2007, and order of
6 March 23, 2007, declaring Lorraine Brooke Associates a
7 surrogate to Orenthal James Simpson."

8 A I don't get "surrogate."

9 Q This says you're making this declaration in
10 support of your motion to vacate those orders, which
11 means get rid of those orders.

12 A Okay.

13 Q Do you recall that?

14 A Yes. I recall Leonardo and I definitely
15 having discussions about this.

16 Q You discussed this issue with Mr. Starke?

17 A Correct, and him explaining to me why we're
18 involved in it.

19 Q What did he say to you?

20 A That the Goldmans believe that Lorraine
21 Brooke and Mr. Simpson is the same.

22 Q What else did he say?

23 A In order to -- we have to fight it to let
24 them know it's not. Because you have claims against
25 Lorraine Brooke. We have to defend ourselves in

1 regards to where we are now. Which I never thought we
2 would be here.

3 Q Did you have counsel in California assisting
4 you with this?

5 A Yes.

6 Q Who was that?

7 A Tappan Zee.

8 Q Let's go to Number 8.

9 (Thereupon, the said document was marked
10 as Exhibit No. 8 for identification by the
11 Reporter.)

12 BY MR. BATTISTA:

13 Q Is that Mr. Starke's signature on the bottom
14 right?

15 A Yes.

16 Q Are you familiar with his signature?

17 A Yes.

18 Q Let's go to Number 9.

19 (Thereupon, the said document was marked
20 as Exhibit No. 9 for identification by the
21 Reporter.)

22 BY MR. BATTISTA:

23 Q On the second page of Number 9, is that his
24 signature?

25 A Yes, sir.

1 Q Do you know why he was giving the affidavit
2 in Number 8 and the declaration in Number 9? Do you
3 know what those are for?

4 A No, I don't know.

5 Q Next is Number 10.

6 (Thereupon, the said document was marked
7 as Exhibit No. 10 for identification by the
8 Reporter.)

9 BY MR. BATTISTA:

10 Q This is a 2007 corporate annual report for
11 Lorraine Brooke Associates.

12 Do you see that?

13 A Yes.

14 Q Filed April 30, 2007. On the bottom it says
15 "Signature, Arnelle Simpson."

16 Do you recall participating in the
17 preparation and filing of this?

18 A What do you mean?

19 Q Do you recall being involved in the
20 preparation and filing of this?

21 A Preparation of --

22 Q With the Secretary of State. It's the annual
23 report.

24 A He told me about it, yes.

25 Q In the middle it says, "Officers and

1 directors, title, D. Starke, Leonardo."

2 Do you know what this was for?

3 A I'm sure he probably explained it to me, but
4 right offhand, no, I do not.

5 Q We can skip Number 11. We can skip Number
6 12.

7 (Thereupon, the said documents were marked
8 as Exhibit Nos. 11 through 13 for identification by
9 the Reporter.)

10 BY MR. BATTISTA:

11 Q How about Number 13? Do you know what these
12 are?

13 A They're checks.

14 Q Have you ever seen them before?

15 A No.

16 Q You have no idea what these are for?

17 A These are Washington Mutual -- no. I would
18 have to --

19 Q If you don't know, you don't know.

20 A Mr. Simpson's signature is on there, too.

21 Q Is that Mr. Starke's signature along with
22 Mr. Simpson's?

23 A Yes.

24 Q These are checks drawn on Mr. Starke's client
25 trust account, payable to Washington Mutual?

1 A Correct.

2 Q But you don't know what they're for?

3 A No.

4 Q Do you know why Mr. Simpson is signing on a
5 check on the Leonardo Starke client trust account?

6 A No, I don't.

7 Q We talked about 14. We talked about 15. We
8 talked about 16. We talked about 17. We talked about
9 18. Let's go to 19.

10 (Thereupon, the said document was marked
11 as Exhibit No. 19 for identification by the
12 Reporter.)

13 BY MR. BATTISTA:

14 Q Do you recognize these?

15 A Yes.

16 Q What are these?

17 A Statements.

18 Q For whom?

19 A Banking statements.

20 Q For whom?

21 A For Lorraine Brooke, I believe.

22 Q The first one I have here appears to be dated
23 May 22, 2006 through May 31, 2006.

24 Is this the very first bank statement that
25 Lorraine Brooke has?

1 A I believe so, yes.

2 Q Do you remember opening a bank account with
3 Bank of America on May 22, 2006?

4 A Yes.

5 Q A couple of months after the company was
6 formed?

7 A Correct.

8 Q Did you open the account yourself?

9 A No. Leonardo did it for me.

10 Q Did you maintain these bank statements or did
11 Leonardo?

12 A Leonardo did.

13 Q Did you balance the checkbooks or did
14 Leonardo?

15 A He did.

16 Q Let's go to Number 20.

17 (Thereupon, the said document was marked
18 as Exhibit No. 20 for identification by the
19 Reporter.)

20 BY MR. BATTISTA:

21 Q Is this Mr. Starke's signature on this
22 document?

23 A Correct.

24 Q What is this?

25 A It is a resignation.

1 Q Do you recall getting this from Mr. Starke in
2 or around December 13, 2006?

3 A Yes.

4 Q Did he call you and tell you he was going to
5 be resigning?

6 A Yeah. We discussed it.

7 Q What did he say?

8 A He just said that he was going to resign from
9 being in the company.

10 Q Why was he going to resign?

11 A He just felt that he should not be a part of
12 the company anymore. It wasn't anything that was a bad
13 thing or a good thing. It was just a decision he made.
14 I said okay. But he would still help me and
15 advise me and guide me.

16 Q Although he does say at the bottom of this,
17 "However, I am sure you, your brothers and sister will
18 make the best decisions moving forward."

19 A Uh-huh.

20 Q But he was going to stay on and help you out?

21 A Uh-huh. I asked him to.

22 Q Let's go to 21, director's resignation.

23 (Thereupon, the said document was marked
24 as Exhibit No. 21 for identification by the
25 Reporter.)

1 BY MR. BATTISTA:

2 Q Is that Mr. Starke's signature?

3 A Yes.

4 Q This is dated March 30, 2006, right?

5 A Uh-huh.

6 Q That was only a week after the company was
7 formed.

8 Was he originally a director of the company?

9 A I believe so. I don't remember all the
10 details of everything.

11 Q Do you know why he resigned almost
12 immediately as director?

13 A No, I don't remember.

14 Q Did you discuss it with him?

15 A I don't remember.

16 Q Let's go to 22.

17 (Thereupon, the said document was marked
18 as Exhibit No. 22 for identification by the
19 Reporter.)

20 BY MR. BATTISTA:

21 Q Do you recognize this letter?

22 A No.

23 Q Is that Mr. Starke's signature on the bottom?

24 A Yes, it is.

25 Q Do you recall any discussions with him about

1 this letter?

2 A I believe I remember having somewhat of a
3 discussion about this.

4 Q Do you know what it is?

5 A I can't off my head tell you exactly. It was
6 March --

7 Q It was March 15, 2007, just a couple of
8 months ago.

9 A Yes.

10 Q Let's go to Number 23.

11 (Thereupon, the said document was marked
12 as Exhibit No. 23 for identification by the
13 Reporter.)

14 BY MR. BATTISTA:

15 Q Do you recognize that?

16 A No.

17 Q You've never seen this before?

18 A No.

19 Q Next is Number 24.

20 (Thereupon, the said document was marked
21 as Exhibit No. 24 for identification by the
22 Reporter.)

23 BY MR. BATTISTA:

24 Q This is an e-mail exchange between Mr. Starke
25 and a Mr. O'Hanlon.

1 Do you know Mr. O'Hanlon?

2 A No, I do not.

3 Q Have you ever seen this before?

4 A No.

5 Q Next is Number 25.

6 (Thereupon, the said document was marked
7 as Exhibit No. 25 for identification by the
8 Reporter.)

9 BY MR. BATTISTA:

10 Q This is an assignment order and restraining
11 order.

12 Do you see that?

13 A Yes.

14 Q Have you ever seen this order before?

15 A No.

16 Q This is what I referred to as a surrogate
17 order.

18 A Oh. I still don't understand.

19 Q I'm just curious as to whether you saw it.

20 A No, I have not.

21 Q Number 26.

22 (Thereupon, the said document was marked
23 as Exhibit No. 26 for identification by the
24 Reporter.)

25

1 BY MR. BATTISTA:

2 Q This is an order declaring Lorraine Brooke
3 Associates a surrogate of Orenthal James Simpson.

4 Have you ever seen this before?

5 A No.

6 Q Number 27.

7 (Thereupon, the said document was marked
8 as Exhibit No. 27 for identification by the
9 Reporter.)

10 BY MR. BATTISTA:

11 Q Have you ever seen this before?

12 A No.

13 Q This is the judgment that Mr. Goldman has
14 against your father for \$38,250,110.90.

15 You've never seen that?

16 A No. What's the date on this?

17 Q The judgment was March 1997.

18 A Oh, this is old.

19 Q Exhibit 28 we can skip, 29 we can skip, 30 we
20 can skip. Let's just quickly go through 31.

21 (Thereupon, the said documents were marked
22 as Exhibit Nos. 28 through 31 for identification by
23 the Reporter.)

24 BY MR. BATTISTA:

25 Q Have you ever seen this before?

1 A What's this?

2 Q Order granting ex parte application for
3 issuance of or directing sheriff to sell intangibles.

4 A No. I don't remember seeing this.

5 Q Next is a transcript of a hearing in
6 California, dated March 23, 2007.

7 (Thereupon, the said document was marked
8 as Exhibit No. 32 for identification by the
9 Reporter.)

10 BY MR. BATTISTA:

11 Q Were you at that hearing?

12 A No.

13 Q Do you know Mr. Ronald Slates?

14 A Do I know him, no.

15 Q Do you know Mr. Steven Bingham?

16 A Nope.

17 Q Let's go to 33.

18 (Thereupon, the said document was marked
19 as Exhibit No. 33 for identification by the
20 Reporter.)

21 BY MR. BATTISTA:

22 Q This is an ex parte application of Lorraine
23 Brooke Associates for an order staying sale. This
24 appears to be filed by Zee Law Group.

25 Is that your lawyer?

1 A Correct.

2 Q When I say "you," I mean Lorraine Brooke
3 Associates. That was my fault.

4 A Okay.

5 Q This was in litigation between Mr. Goldman
6 and Mr. Simpson, correct?

7 A Correct.

8 Q Do you know what this motion is about?

9 A I'm assuming that it's about the book.

10 Q Do you recall having any discussion with
11 Mr. Zee about this motion?

12 A Yeah. We did have a discussion about it.

13 Q What was that about?

14 A In regards to -- you have to bear with me. I
15 guess the suit from the Goldmans to Mr. Simpson and
16 Lorraine Brooke.

17 Q Do you recall that this was attempting to
18 stop the auction sale of the book?

19 A Is that what this is?

20 Q I'm asking you.

21 A I don't know that, but I do know that they
22 wanted to.

23 Q Do you know whether you also tried to vacate
24 or undo the surrogate order?

25 A Yes.

1 Q Do you know whether you were successful?

2 A I believe that's what we're dealing with now.

3 Q Next is Number 34.

4 (Thereupon, the said document was marked
5 as Exhibit No. 34 for identification by the
6 Reporter.)

7 BY MR. BATTISTA:

8 Q This is another motion by Mr. Zee.

9 Do you recall having any discussion about
10 this motion with him?

11 A What's the motion? I'm not familiar with
12 this kind of stuff.

13 Q The way you can tell what the motion is, the
14 middle right-hand side says "Notice of Motion to Vacate
15 Assignment Order and Restraining Order."

16 A Okay.

17 Q Do you recall having a discussion on this
18 motion with Mr. Zee?

19 A Yes, I believe we did have discussions.

20 Q Is this the same as the last one, trying to
21 vacate or undo the surrogate order, if you know?

22 A I don't know. The terms are just not me.

23 Q I understand.

24 We can skip 35.

25

1 (Thereupon, the said document was marked
2 as Exhibit No. 35 for identification by the
3 Reporter.)

4 THE WITNESS: Is this mine to keep?

5 BY MR. BATTISTA:

6 Q If you'd like it you can have it.

7 Mr. Whittle can keep his.

8 Do you know someone named Michael Gilbert?

9 A Yes.

10 Q Who is he?

11 A A friend of my father's.

12 Q Just a personal friend or is he a business
13 associate?

14 A I believe they're friends, and they've done
15 business together in the past.

16 Q Do you know whether Mr. Gilbert has asserted
17 claims against your father?

18 A Yeah, I do. Well, I don't know that,
19 actually.

20 Q Do you know if he filed litigation against
21 your father, a lawsuit?

22 A I don't know that.

23 Q Why do you think he might have claims against
24 your father?

25 A I don't know that, because they were very

1 good friends. I don't know that.

2 Q Have you ever spoken to Yale Galanter about
3 this book?

4 A No.

5 Q The friendship with Raffles Van Axle, that
6 was between you and Raffles.

7 Did your father have a relationship with
8 Mr. Van Axle?

9 A Yes.

10 Q He was friends with him before you, after
11 you?

12 A Before me.

13 Q Do you know whether your father did any other
14 deals with Mr. Van Axle besides this book deal?

15 A I don't know that.

16 Q Had you ever spoken to anybody at
17 HarperCollins about negotiating the book deal?

18 A Me personally, no.

19 Q It was all Mr. Starke?

20 A Yes, sir.

21 Q Or to the extent your dad negotiated his
22 deal, your dad?

23 A Yeah.

24 Q From the time that you formed the company and
25 you signed the book deal in March, April and May of

1 '06, until we established it became public in the
2 October, November time frame of '06, was there a
3 particular reason why you did not want it to become
4 public in between these two dates?

5 A Why we didn't want it to?

6 Q Yes.

7 A Not a particular reason, no.

8 Q But you wanted to keep it confidential, at
9 least until it was ready to go?

10 A From what I understand, that's what you do.

11 Q Was that decision yours or was it your
12 father's or was it Mr. Starke's?

13 A I believe it was collective.

14 Q Do you know whose idea it was?

15 A No. I think it was just assumed. I mean, on
16 my part it was assumed.

17 Q Was there ever a discussion, "We can't
18 disclose the existence of this book"?

19 A No.

20 Q That's what I was trying to get at, a
21 specific discussion.

22 A No, there was not.

23 MR. BATTISTA: Okay. Thank you very much. I
24 do appreciate you coming and taking the time to answer
25 my questions.

1 THE WITNESS: Thank you for being gentle with
2 me.

3 (Thereupon, the deposition was concluded.
4 Reading, subscribing and notice of filing were
5 waived.)

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CERTIFICATE OF OATH

STATE OF FLORIDA
COUNTY OF DADE

I, the undersigned authority, certify that ARNELLE SIMPSON personally appeared before me and was duly sworn.

WITNESS my hand and official seal this 14th day of June, 2007.

HELAYNE FURMAN WILLS
Notary Public - State of Florida
My Commission No. DD447997
Expires: August 2, 2009

REPORTER'S DEPOSITION CERTIFICATE

STATE OF FLORIDA
COUNTY OF DADE

I, HELAYNE FURMAN WILLS, Court Reporter, certify that I was authorized to and did stenographically report the deposition of ARNELLE SIMPSON; that a review of the transcript was not requested; and that the transcript is a true and complete record of my stenographic notes.

I further certify that I am not a relative, employee, attorney, or counsel of any of the parties, nor am I a relative or employee of any of the parties' attorney or counsel connected with the action, nor am I financially interested in the action.

DATED this 14th day of June, 2007.

HELAYNE FURMAN WILLS

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