

Dist. Exh. for IU 711
~~EX. EXHIBIT 10/30/85~~
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NFL



DOC # 346B

donald trump called me this morning and asked to meet. i have known trump casually for six or seven ~~years~~ moving met him at charity dinners, etc., around n.y. i agreed to meet with him and he called back ~~me~~ after ~~several~~ renting a suite at the pierre hotel. we met at 4p.m.

trump discussed several aspects of the u.s.f.l. and appeared to be very candid. he said that he was given the responsibility for developing the anti-trust suit against the n.f.l. (stadium leases, klein and the tulsa team's efforts to play in san diego stadium and ~~klein's~~ klein's deposition(?), ~~scouts~~ scouts and g.m.'s 'had mouthing u.s.f.l..

also he is prepared to set up at big florida real estate man (biggest in the state) to buy washington and move it to miami and also get new ownership in chicago.

if he follows through on the above two matters he would not be in position to do what he really wants because they would make him too committed "a year or two from now."

he said he wants a nfl team ~~in~~ to play in fall. said he would sell generals to "one of the stiff's that would buy" if he could have an expansion franchise in n.y. said he would play in Shea stadium and get a new stadium built.

also said, but maybe not as condition, if i wanted he could suggest names of 2 or 3 of the better people in u.s.f.l. that might do the same ~~in~~ thing and have the other expansion franchise.

pointed out the dilution of tv over 2 3 years of contracts and said he could work out something re that for the 3 years. didn't say, but apparently ~~not~~ being willing to take less or nothing from tv.

mentioned the problem of 3 teams in n.y. and he said the might take one or maybe the two networks (cbs and nbc) would just carry the "successful teams".

he said he did not feel anti-trust problem if he just sold and later came into nfl.

i basically listened and said i would get back to him after league meeting.

+ T's dep't - "psychologically demanding" + usin

Call

July 17

Rozelle - direct

6450

1 A. Jim Spence of ABC.

2 Q. Thank you.

3 Now, Commissioner, moving to your relationships
4 in 1981 and 1982 with Mr. Trump, would you characterize Mr.
5 Trump as a friend of yours in 1981 and 1982?

6 A. No, he wasn't a friend.

7 Q. Had you ever had any telephone conversations
8 with Mr. Trump before March 12th of 1984?

9 A. Never.

10 Q. In the trial transcript, reading from page 4029,
11 at line 21,, the question to Mr. Trump was,

12 "Q. When I say this period of time, we are
13 talking of the period late 1981-early 1982, prior to the
14 actual formation of the United States Football League. Did
15 you have more than one conversation?

16 "A. Yes, sir. Substantially more than one."

17 Comm. Rozelle, did you have one or substantially
18 more than one conversation with Mr. Trump in 1981-1982?

19 A. I did not. The only times that I would see him
20 would be at maybe two or three charitable affairs in New
21 York, and I would in order to him, perhaps I would say
22 hello, if I was close to him. But I had no discussions
23 with him.

24 Q. Reading from page 4031 of the transcript --

25 THE COURT: What are you referring to when you

1 refer to charitable affairs, so the jury has a better
2 understanding? What are you referring to?

3 THE WITNESS: Some major charity in New York
4 would hold a benefit, a large dinner. There might be a
5 thousand people there. And I would attend these functions,
6 and as I say, once or twice a year I might see Mr. Trump in
7 the thousand people during the cocktail period and exchange
8 greetings with him. But we had no discussions.

9 Q. On page 4031 of the trial transcript, the
10 question placed to Mr. Trump at line 19 is as follows: "Do
11 you recall with respect to the face to face conversations,
12 do you recall where any of those took place?"

13 "A. One was, I believe, at the Regency Hotel
14 in the smaller ballroom at an affair. And the other I
15 believe was at the Pierre Hotel in the lobby. And I
16 believe that I was leaving the Pierre and Mr. Rozelle was
17 coming into the Pierre."

18 Did you have, Comm. Rozelle, in 1981 or 1982,
19 any business discussions with Mr. Trump relative to the
20 issue of football at the Regency hotel in a small ballroom
21 or at the Pierre Hotel in the lobby?

22 A. None whatsoever.

23 Q. Going onto the trial transcript at page 4032,
24 starting at line 4, the question to Mr. Trump, and to
25 orient you, we are now at the Regency or the Pierre, one or

1 the other. The question to Mr. Trump:

2 "Q. Will you tell again on the basis of that,
3 and on the telephone calls that you had with him during the
4 same period, tell us what Mr. Rozelle said to you and what
5 you said to him. Answer" --

6 MR. MYERSON: Your Honor, I am going to object
7 to that on the basis of the question that was read. That
8 is unintelligible. Will you at the time -- there's been no
9 identification of what the "that" is.

10 MR. ROTHMAN: I will read the trial transcript,
11 if your Honor please, verbatim. May I start in order to
12 pick it up with page 4031 at line 19: The question to Mr.
13 Trump:

14 "Q. Do you recall with respect to the face to
15 face conversations, do you recall where any of those took
16 place?

17 "A. One was, I believe, at the Recency hotel
18 in the smaller ballroom at an affair. And the other I
19 believe was at the Pierre Hotel in the lobby. And I
20 believe that that I was leaving the Pierre and Mr. Rozelle
21 was coming into the Pierre.

22 "Q. At either of those face to face
23 discussions was anybody else present?

24 "A. No; I don't believe so.

25 "Q. Will you tell again on the basis of that,

1 and on the telephone calls that you had with him during the
2 same period, tell us what Mr. Rozelle said to you and what
3 you said to him."

4 Before I read on, Mr. Rozelle, Commissioner, you
5 are telling us that you had no such business conferences at
6 the Recency or at the Pierre, is that correct?

7 MR. MYERSON: Objection.

8 THE COURT: Sustained.

9 Q. "A. The conversations were almost identical in
10 their nature. The conversations were that he didn't think
11 I should go into the United States Football League, and
12 again, this is prior to my going in by a substantial amount
13 of time; that he didn't think I should go into the United
14 States Football League; that it was going to be doomed to
15 failure and that the league itself could not make it
16 playing football in the spring because of television. And
17 he went on to give me a very brief description of why it
18 couldn't make it. That it couldn't make it based on the
19 fact that you couldn't get the ratings to justify the cost
20 of paying this number of people that a football team has
21 where you have 42 and 45 people, and so forth. And there
22 just weren't enough people watching football in the spring,
23 that they were out voting, playing tennis, playing golf or
24 anyone of the thousands of other things and there was no
25 way that it could ever been economically justified so that

1 the league was doomed to failure and if the league ever
2 moved to the fall, which he heard was my basic contention,
3 that if the league should ever start in the fall against
4 the NFL if necessary and that there was no way we would
5 ever get a television contract because he controlled,
6 literally controlled the television networks as far as the
7 television is concerned and they could never get a
8 television contract."

9 Commissioner, did that conversation take place
10 in the lobby of a public hotel, the Recency or the Pierre,
11 when you were speaking to Mr. Trump, allegedly speaking to
12 Mr. Trump?

13 MR. MYERSON: Objection, your Honor.

14 THE COURT: Overruled.

15 A. That is preposterous. That conversation never
16 took place in the lobby of the Pierre Hotel or in the lobby
17 or ballroom of the Recency Hotel at any time.

18 Q. Did it take place anywhere?

19 A. No.

20 Q. Commissioner, did you ever say to Mr. Trump --
21 how long had you been the Commissioner of the National
22 Football League in 1981, '82?

23 A. By that time, I guess 21 or 22 years.

24 Q. Sir, would you say in a public room or any place,
25 for that matter, that you controlled the television

1 networks?

2 A. It's ridiculous, because number one, I don't, no
3 one does. And it would just be stupid.

4 No, I did not say that; anything like that.

5 Q. Now, sir, in March, and specifically the 12th of
6 March of 1984, did you receive a telephone call from Mr.
7 Trump?

8 A. For the first time, I talked to Donald Trump on
9 the telephone on March 12th, 1984.

10 Q. Comm. Rozelle, who placed the call?

11 A. Mr. Trump placed the call to my office, and left
12 word for me to call in the morning.

13 Q. Were you in the office when the first call came?

14 A. No.

15 Q. When you returned to your office did you respond
16 to the call?

17 A. My secretary advised me of the message, so I
18 told her to return the call, and she did.

19 Q. And did you speak with Mr. Trump?

20 A. Yes.

21 Q. Comm. Rozelle, is that telephone conversation of
22 March 12th, 1984 which you are about to tell us about, the
23 first telephone conversation that you had with Donald Trump
24 relative to the issue of the National Football League or
25 the United States Football League?

1 A. It's the first telephone call I ever had from
2 Donald Trump on any subject.

3 Q. All right.

4 When you placed the call to Mr. Trump, would you
5 tell us what was said?

6 A. Mr. Trump told me he would like to meet with me
7 privately. And I said I was leaving for our league
8 meetings in Hawaii in a few days, but I would be free late
9 that day, March 12th. That's what I said to Mr. Trump.

10 Q. What did he say to you?

11 A. He said he would like to meet me and that he
12 would rent a room in the Pierre Hotel, he would call back
13 to tell me the room number; and we mutually agreed that we
14 would meet at 4:00 that afternoon.

15 Q. Did Mr. Trump sometime thereafter call and tell
16 you where the room would be?

17 A. He called me back and told me the room number at
18 the Pierre Hotel.

19 Q. And so far as you know, who was it that arranged
20 for and paid for that hotel room?

21 A. Mr. Trump did.

22 Q. Did you meet him at the Pierre Hotel that
23 afternoon?

24 A. Yes.

25 Q. Comm. Rozelle, is this meeting the first meeting

1 that you ever had with Mr. Trump relative to the issues of
2 football?

3 A. Yes.

4 Q. Now, sir, would you tell the ladies and
5 gentlemen of the jury and the Court, as precisely as you
6 are able to do so, what transpired at that meeting?

7 A. I arrived and Donald Trump was in the room, and
8 after a casual conversation, he spoke to me about the US
9 Football League. Donald Trump told me that he had been
10 given the responsibility to develop an antitrust case --
11 suit against the National Football League on behalf of the
12 United States Football League.

13 He also told me that he was arranging for a
14 wealthy real estate man in Florida, he said the biggest
15 real estate man in Florida, to buy what he said was the
16 failing Washington Federals team, and move that team to
17 Miami.

18 He further told me that he was going to arrange
19 for new ownership in Chicago. Then he said, "But I don't
20 want to do these things. I want an expansion team in New
21 York in the National Football League. But if I involve
22 myself in these matters that I previously told you, I will
23 be too far committed in a year or two. I want an NFL
24 expansion franchise in New York. I would play in Shea
25 Stadium, and I would arrange for a new stadium to be built

1 for that team in New York."

2 And he said, and I quote him directly, "I would
3 get some stiff to buy the New York Generals, my team in the
4 US Football League."

5 Then he said, "If your interested and you are
6 going to expand by even numbers and expend by two teams, I
7 would be glad to tell you the names of two or three good
8 owners in the United States Football League that you might
9 wish to give the second franchise to."

10 I told him that I raised the antitrust question,
11 on taking such a step, and Mr. Trump told me that he didn't
12 see any problem if he sold the Generals and waited a year
13 or two and then got a National Football League franchise.

14 I further raised the problem of there being
15 three teams in New York and the National Football League
16 having television contracts with only two networks for
17 their Sunday games; so they could only carry two games and
18 if we had three teams here, that they couldn't carry all of
19 them.

20 His reply was, "Maybe ABC could cover the third
21 team's games in New York on Sunday. If not, CBS and NBC
22 could take the more successful team's games and carry them
23 on television."

24 Then he said, and again I quote him exactly, "If
25 I were to leave the United States Football League, it would

1 be psychologically devastating to the US Football League."

2 Q. Have I interrupted you in any way or have you
3 concluded your testimony on the point?

4 A. The only other things were said, I told Mr.
5 Trump I would get back to him, I was leaving for the league
6 meeting in Hawaii and he gave me, which I did not have at
7 that time, he gave me his home telephone number and he gave
8 me his office number. And I said I will get back to you.

9 Q. Commissioner, at any time in that meeting, did
10 you offer Mr. Trump a National Football League franchise?

11 A. I certainly did not. That would be call for 21
12 approving votes of the owners and I did not offer him a
13 franchise, suggest it, infer it, or encourage him.

14 Q. Commissioner, do you have the power to offer
15 anybody a franchise?

16 A. I do not.

17 Q. When you left the meeting, I believe you have
18 just testified you got Mr. Trump's phone numbers and told
19 him you'd get back to him, is that correct?

20 A. Yes.

21 Q. Without going into the conversation, please, we
22 must live by the rules, now, without going into the
23 conversation, did you discuss your meeting with Mr. Trump
24 with any other owner of the National Football League?

25 A. Yes.

1 Q. With whom?

2 A. With the chairman of the finance committee, Mr.
3 Culverhouse, whom I spoke to at the meeting in Hawaii.

4 Q. That was how long after you are meeting with Mr.
5 Trump at the meeting in the Pierre?

6 A. Just several days or a week later, I forget.
7 But our meeting in Hawaii was shortly after the meeting
8 with Mr. Trump at the Pierre. I so think it was within a
9 week.

10 Q. Following the meeting in Hawaii and following
11 your conversation with Mr. Culverhouse, did you then get
12 back to Mr. Trump?

13 A. When I returned from the meeting, after a few,
14 days I did call Mr. Trump, I believe at his home. I had
15 his home number that he had given me and his office number.
16 I believe I called him at home on a weekend. And I told
17 him it was not a viable situation, his proposal.

18 Q. Was that the last discussion you had with Mr.
19 Trump relative to this subject matter?

20 A. It was.

21 Q. Commissioner,, and this is my last question to
22 you, sir, with respect to your relationships as the
23 Commissioner of the National Football League, with the
24 American Broadcasting Company, the National Broadcasting
25 Company, Colombia Broadcasting Company, ESPN cable network,

1 have you ever, Commissioner, directly or indirectly
2 attempted to apply any pressure to those entities or to
3 those executives of those entities as it relates to the
4 relationship they had in the United States Football League?

5 A. Mr. Rothman, No, I did not.

6 MR. ROTHMAN: Thank you, sir. I appreciate your
7 testimony.

8 THE COURT: Mr. Myerson.

9 MR. MYERSON: Thank you, your Honor.

10 CROSS EXAMINATION

11 BY MR. MYERSON:

12 Q. Mr. Rozelle, you said that when Mr. Trump called
13 you concerning this meeting that was held at the Pierre,
14 that you were getting ready to leave in 3 days for the
15 league meetings of the NFL, did I understand you correctly?

16 A. I think I said a few days.

17 Q. Yes.

18 And were you busy in terms of preparing for the
19 league meeting that was coming up?

20 A. I was just finishing my preparations, which is
21 why I told Mr. Trump I wouldn't be able to meet with him
22 until later in the day.

23 Q. Mr. Rozelle, do I understand your testimony
24 correctly that until Mr. Trump called you that morning you
25 had never had a single conversation with Mr. Trump relating

1 to football or business of any kind? Is that your
2 testimony?

3 A. First, that is the only telephone call I had
4 received from him up to that point. Two, the only
5 conversation about football up to that point I had was with
6 an intermediary that Mr. Trump had call me, a mutual friend,
7 to discuss the possibility of him buying the Baltimore
8 Colts in 1981.

9 Q. Mr. Rozelle, your testimony that you just gave
10 this morning is, Mr. Trump was not your friend, correct?

11 A. He was an acquaintance. He was not a friend.
12 He was not even on my Christmas card list.

13 Q. He wasn't on your Christmas card list, he was
14 not a friend, and you had never had a conversation with him
15 in either of the hotels or any other place other than your
16 nodding and saying hello, correct?

17 A. No conversation concerning football.

18 Q. And it's your testimony and you are having this
19 Court and this jury, you are asking this Court and this
20 jury --

21 MR. ROTHMAN: Just a moment, your Honor. I am
22 going to object to the form of that question. That is an
23 inappropriate form of a question, if your Honor please. He
24 is testifying.

25 THE COURT: I will sustain the objection.

1 Q. It's your testimony, Mr. Rozelle, under oath,
2 that --

3 MR. ROTHMAN: I am going to object to that.

4 THE COURT: Why don't you just ask the question,
5 Mr. Myerson.

6 Q. Is it your testimony, Mr. Rozelle, that on the
7 day that you received a telephone call from a man who was
8 not even on your Christmas card list and at a time when you
9 were preparing for going to your league meetings a few days
10 hence, and without any knowledge of why the conversation
11 was going to be, you said to him, "I will meet with you
12 later today"? Is that your testimony?

13 A. Yes, because he was the owner of the New Jersey
14 Generals, and I felt it was my responsibility and
15 obligation as Commissioner to hear what he had to say; so I
16 could communicate it, if necessary, to our owners in the
17 NFL.

18 MR. MYERSON: Your Honor, at this point I
19 believe the record full of days and days of trial
20 concerning this topic and related topics and, accordingly,
21 we will not burden the Court and jury with any further
22 questions.

23 MR. ROTHMAN: I will not comment on the comment.

24 THE COURT: All right. The jury should
25 disregard, as I have indicated before, comments by counsel

1 absolute not be made and should be disregarded.

2 Counsel have an opportunity in opening
3 statements and closing statements to address the jury
4 directly. Other than that, they are not supposed to have
5 the opportunity, both sides have had asides from time to
6 time which I have not approved of, and when objections have
7 been made I have told the jury to disregard them. I don't
8 want to blow this one out of proportion, however.

9 Is there redirect?

10 MR. ROTHMAN: There is none, your Honor.

11 THE COURT: You are excused, Mr. Rozelle. Thank
12 you.

13 THE WITNESS: Thank you, your Honor.

14 (Witness excused)

15 MR. ROTHMAN: Your Honor, as I have indicated to
16 the Court, subject to some technical readings of the
17 depositions which we need not burden the jury with,
18 pursuant to stipulation of counsel, with that caveat, your
19 Honor, the defense rests.

20 THE COURT: All right.

21 I have discussed with Mr. Myerson the rebuttal
22 situation. There is going to be a short rebuttal, which
23 Mr. Myerson will have the opportunity for Monday afternoon
24 and Tuesday morning and I am then going to be conferring
25 with counsel concerning the charge to the jury on Tuesday