"Like I told Book, I told him, Book, you know all of these veterans, send me a couple of veterans, that's what I'm going to use it for."

So, Mr. Sood -- was it your understanding that
Mr. Sood is saying that Book's value is for veterans, veteran
NBA players?

A. Yes.

Q. Okay. And in your mind, was that what you were payingMr. Richardson for -- or let me rephrase.

In your mind, was that Mr. Richardson's value, if any?

A. So, Book was two-fold. One was to -- like we discussed yesterday, I had to do something to placate Jeff. I had to put a coach in front of him at the end of the day. So that was the first value that Book had, was just to get Jeff off our backs, basically. I didn't care -- like we discussed in the call yesterday, I didn't care what Book did; it was irrelevant to me.

Secondly, Book did have relationships with players that were in the NBA because they had been players that's come through Arizona who didn't make it to the NBA.

So, yes, secondly, that was another -- that was part of our relationship that was a value that Book could have.

- Q. And you didn't need Book to help you win players at Arizona, did you, Mr. Dawkins?
- 25 A. No. It was twofold reasons. One, I --

1 MR. BOONE: Objection.

THE COURT: Sustained.

3 MR. MOORE: I'll ask another question.

- 4 | Q. You had a relationship with the head coach at Arizona;
- 5 | isn't that right, Mr. Dawkins?
- 6 A. Correct.
- 7 | Q. Sean Miller, correct?
- 8 A. Correct.
- 9 | Q. Okay. And you didn't need Mr. Richardson to help you with
- 10 | players in Arizona because you had a relationship with the head
- 11 | coach at Arizona; isn't that right?
- 12 A. That's correct.
- 13 | Q. And you didn't pay the head coach a dime, did you?
- 14 A. Never.
- 15 | Q. Okay. Because the head coach was a friend of yours,
- 16 | correct?
- 17 A. We had a pretty good relationship, yes.
- 18 | Q. Okay. And I know you may not want to say this, but you
- 19 knew that the head coach was paying players themselves, right?
- 20 MR. BOONE: Objection.
- 21 THE COURT: Sustained.
- 22 (Continued on next page)

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- 1 | BY MR. MOORE:
- 2 Q. Is that discussed on this wiretap call, Mr. Dawkins --
- 3 MR. BOONE: Objection.
- 4 | Q. -- that the government played for you?
- 5 A. There is wiretaps that were played and not played where the 6 government --
- 7 MR. BOONE: Objection to what's played and not played.
- 8 MR. MOORE: I'll ask a very -- I'll rephrase and ask a 9 very specific question, and if you'd answer yes or no.

Q. On this call, yes, DX 7, there is a discussion about Sean

- 11 | Miller and him paying players, is that correct, Mr. Dawkins?
- 12 A. Yes.

10

- 13 | Q. You didn't think that was a crime, did you?
- 14 A. No.
- MR. BOONE: Objection.
- 16 THE COURT: Sustained.
- 17 | Q. You still don't think it is, do you?
- 18 A. No.
- 19 MR. BOONE: Objection.
- 20 | THE COURT: Sustained.
- 21 | Q. Mr. Dawkins, did you ever try to defraud any school?
- 22 | A. No.
- MR. BOONE: Objection.
- 24 THE COURT: Overruled.
- 25 | A. No, defrauding -- you can't defraud a school. I don't even

1 know how that's possible by players getting money. The 2 school's getting money. It's ridiculous.

- 3 Q. And Mr. Miller at Arizona, he knew what was going on,
- 4 | correct?
- 5 MR. BOONE: Objection.
- 6 THE COURT: Sustained.

correct? You recall telling --

- Q. Now, we heard during your direct testimony you tell the ladies and gentlemen of the jury what you did with the money after these players were -- after money was given to these coaches in Las Vegas and money was given in Los Angeles,
- 12 A. Yes.

11

- Q. -- the ladies and gentlemen of the jury about your meetings with those coaches thereafter, correct?
- 15 A. Yes.
- 16 Q. OK. All right. Now, you know, don't you, Mr. Dawkins,
- 17 | that law enforcement frequently uses the technique called
- 18 | surveillance?
- 19 | A. Yeah.
- 20 MR. BOONE: Objection.
- 21 THE COURT: Overruled.
- 22 | A. Yes, I know now. I didn't then, but I do know now.
- Q. And we've not heard anything about any post-meeting
- 24 | surveillance, have we --
- 25 MR. BOONE: Objection.