

1 sexual advances upon her, the first of which resulted in
2 pregnancy. She has tremendous self loathing over the abortion
3 that she feels you forced on her. The unnecessary death of her
4 unborn 5th son has lain heavily upon her heart and soul. It
5 seems that after the rapes and while you were attempting to
6 coerce Karen to have the abortion you sent your long time
7 retainer Tim Raymond Sypher to befriend and seduce the Karen and
8 control her for you."

9 Q. All right. You received this letter apparently from an
10 attorney that the defendant had retained or had consulted with.
11 This paragraph that you just read refers, again, to where you
12 forced your sexual advances upon her, and refers to an abortion
13 that you forced upon her, and then refers again down here to
14 rapes in the plural. What was your reaction when you received
15 this letter?

16 A. I knew at this point that anything was going to be said. At
17 this point, I didn't know what this lawyer was up to. I didn't
18 know, again, what this was all about.

19 I knew and I felt very comfortable with -- I still had no --
20 who made these phone calls. I felt very comfortable that, (A),
21 I did not force myself on her. I did not force her to get an
22 abortion. And I certainly did not rape her in any way, shape,
23 or form. That never happened. She made the decision to have
24 the abortion on her own, and I had nothing to do with that as
25 well.

1 Q. Okay. Debi, let's look at the very last paragraph of this
2 letter. And if can you blow that -- the last paragraph up for
3 us.

4 A. I'm sorry?

5 Q. I was asking her -- Debi to blow that up a little bit so we
6 can see it.

7 Can you read that?

8 A. "Neither you nor Tim Sypher or anyone on your behalf are to
9 have any conversations with Karen regarding this subject matter
10 further without my presence and until this is resolved. If
11 someone makes contact I have instructed her to record the
12 conversation and report it accordingly."

13 "She requests that you consider an immediate mediation or
14 settlement conference prior to this suit. If it is not done in
15 the next two days, which means prior to Wednesday, she will
16 assume you have no desire to settle this matter and she will
17 seek closure one way or the other."

18 Q. All right. This letter you -- was dated March the 22nd.
19 You said you thought you received it on a Monday. This
20 paragraph is demanding, basically, a settlement conference the
21 same day you receive the letter. Is that --

22 A. That is correct.

23 Q. All right. Did you -- did you construe this letter to be
24 one which contained threats either to your reputation or to
25 accuse you of a crime?

1 A. Well, once again, the -- none of these things were true. So
2 this was, once again, perpetrating this lie. And I immediately
3 turned this over to my attorney.

4 Q. Okay. And you're referring to Mr. Rambicure in Lexington?

5 A. Yes, that's true.

6 Q. All right. Shortly thereafter, did you and Mr. Rambicure
7 have a meeting with law enforcement authorities?

8 A. We did.

9 Q. Okay. Can you tell the members of the jury about that.

10 A. Well, Bill Rambicure and -- after getting this says, "Coach,
11 you need to go to the police. It's time." He said, "You're not
12 going to get through this tournament. They know that you're
13 under stress, and their angle to blackmail you is to do it while
14 you're stressed out with this tournament. You're not going to
15 get through it."

16 And I said, "Okay, Bill. You were right from the beginning.
17 What do we need to do?"

18 Q. Okay. And did you and Mr. Rambicure have a meeting with the
19 Attorney General of the State of Kentucky?

20 A. We did.

21 Q. All right. And was the purpose of that meeting to discuss
22 beginning a criminal investigation of what you viewed as an
23 extortion or a blackmail attempt?

24 A. Yes.

25 Q. All right. And do you recall when that meeting took place?

1 A. I don't.

2 Q. Okay. Do you recall if that meeting took place -- let me
3 back up for a minute.

4 A. I don't recall the exact date.

5 Q. Okay. Mr. Kolter, in this letter of March 22nd, is
6 demanding a very quick meeting with you and some of your
7 representatives to discuss these rape allegations and the forced
8 abortion allegations. Did such a meeting take place to your
9 knowledge?

10 A. With Mr. Kolter?

11 Q. Yes. Did anyone meet on your behalf with Mr. Kolter?

12 A. Yes.

13 Q. Okay. You did not attend a meeting with Mr. Kolter?

14 A. I did not.

15 Q. Okay. Did Mr. Rambicure and Mr. Avare go to a meeting with
16 Mr. Kolter?

17 A. Yes.

18 Q. Okay. To your knowledge, was that meeting with Mr. Kolter
19 after you and Mr. Rambicure had met with the Attorney General?

20 A. Yes.

21 Q. Okay.

22 A. It could have been the next day or even that night.

23 Q. Okay. But you met with the Attorney General to discuss a
24 criminal investigation before Mr. Rambicure and Mr. Avare met
25 with Mr. Kolter?

1 A. That is correct.

2 Q. Okay. And Mr. Rambicure and Mr. Avare, you discussed with
3 them whether or not you should attend this meeting?

4 A. I told them I was not going to this meeting.

5 Q. All right. And what was their purpose in attending?

6 A. That it was a -- this was a -- it looked like a very
7 threatening letter, and it was -- Bill Rambicure wanted to go
8 from a fact-finding standpoint to find out exactly what they
9 were after.

10 Q. All right. And at this point -- you said that Louisville
11 did not go to the championship game in 2009, but around this
12 time, between March 24th and the end of the month, March 31st,
13 is Louisville still involved in the tournament?

14 A. We are.

15 Q. Okay. Are you on the road at that time?

16 A. Yes.

17 Q. Okay. Where were you playing?

18 A. I believe it was Dayton.

19 Q. Okay. In the regional?

20 A. Yes, we were in the Elite Eight.

21 Q. Okay. So you made it to the final eight in 2009.

22 A. Right.

23 Q. Did not make it to The Final Four?

24 A. We did not.

25 Q. Okay. After you and Mr. Rambicure met with the Attorney

1 General, to your knowledge did Mr. Rambicure ask the Attorney
2 General to begin -- formally to begin a criminal investigation
3 of these extortion or blackmail attempts?

4 A. He said it was -- this was -- this was for the FBI.

5 Q. Okay. You're saying that was what the Attorney General
6 communicated to you?

7 A. That was his advice, that he would take this to the FBI.

8 Q. All right. And after that, the -- were you interviewed by
9 the FBI?

10 A. I was.

11 Q. Okay. On April the 9th of last year, I think?

12 A. Yes.

13 Q. So that for you, for Louisville, the tournament is over at
14 that point?

15 A. Yes.

16 Q. Okay. After -- after Mr. Rambicure and Mr. Avare met with
17 Mr. Kolter, did you have some understanding of what the
18 defendant's financial demands were at that point?

19 A. Yes. We met that night.

20 Q. Okay. Do you recall approximately when that was?

21 A. Yes, because the restaurant that we -- the Cardinal Cafe was
22 closing, so it was probably around 8:00, 9:00 at night to about
23 11:00.

24 Q. Okay. And you met with Mr. Avare and Mr. Rambicure?

25 A. I did.