

Jerry Blaine - ^{President & Chairman of Board of} ~~Principal of~~ Jay-Hee and
Cosmat Distributing Co. - distributors
and manufacturers of phonograph records. (P.16)

W has known D for 15 years (P.25)

In 1955 W & D had a disagreement & D stopped
playing W's records. (P.26). At this time D
was a disc jockey for WINS. (P.27)

On Dec. 6, 1955 W took a second mortgage
of \$11,000 on D's house in Stamford, Conn.
based on the "foregone conclusion" that
D would give W's records greater exposure
& preferential treatment. (P.28) After W
gave D the \$11,000 & took a mtge D started
playing Cosmat records, noticeably so. (P.29)

D's admission
received \$6,000
in profits from
Blaine.

This went on for 4 weeks & then D played
W's records only occasionally. (P.30). D
defaulted on the mtge & W started
foreclosure proceedings (P.30). The mtge
was then purchased by Roulette Records
& W was paid back the full amt. (P.31)

In 1958 W made an arrangement
with Jack Hook, D's manager, whereby
W was to pay D \$500 per month &
D was to play W's records. (P.32-33)

Subsequently D began to play W's records
more frequently again (P.33-34)

W paid D sums periodically. (P.34) W would
give the checks to Hook for D. (P.35)

(2) for Hooke who picked it up from Blaine.

Exhibit #1 - Check drawn by Cornat Distributing Co, signed by W, dated Sept. 29, 1958 made out to D - the amount of \$2,000 was given to Hook to cover pymt for 4 months & was signed on the back by D (P.35)

Exhibit #2 Check dated July 2, 1959 for \$2,000 payable to D was given to Hook for D & was endorsed on back by D. This check was given on basis of the earlier agreement with Hook for \$500 per month (P.36)

Exhibit #3 Check dated Oct 7, 1959 for \$2,000 payable to D was given to Hook for D, pursuant to the agreement that W pay D \$500 per month. (P.37). During the course of time, while W was giving these checks to Hook

D was playing Cornat records (P.38)

At the time these monies were given D was a disc jockey on radio station WABC (P.39) These monies were given, in order that D might expose or play W's records on WABC (P.39-40)

The practice of paying ^{money} to people pursuant to an agreement that they would expose, favor & play records was common in the industry & the general practice (P.20#)

W knew that these people were employees of various corporations, individuals & companies operating radio stations. The employers were never told of this arrangement. (P.21#)

D states not his endorsement but cash was deposited in his a/c.

D states not his endorsement but cash was deposited in his a/c.

D states that she is not his endorsement & D does not know if he received the money.

D states that above pymts were loans.

D states that loans were not made pursuant to any agreement.

D never repaid loans & W never asked for repayment.

D did not give greater exposure to W's records as a result of the loans.

D states that Blaine & Hooke are liars.