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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
DALLAS DIVISION

TNA ENTERTAINMENT, LLC,

Plaintiffs,

vs.

CIVIL ACTION FILE

NO. 808CV-522-B

CHARLES "CARLOS" ASHENOFF,

Defendant,

vs.

JEFFREY L. JARRETT, DIXIE
CARTER, PAUL W. TAYLOR III
(p/k/a TERRY TAYLOR), and
WAYNE KEOWN (p/k/a DUTCH
MANTEL,

Third-Party
Defendants.

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VIDEOTAPED DEPOSITION OF

CHARLES RUDY ASHENOFF

February 24, 2009

9:12 a.m.

Suite 1400

1349 West Peachtree Street, N.E.

Atlanta, Georgia

Juliana W. Pawenski, CCR-B-1256, RPR, CRR, CLR

1 A. Yes.

2 Q. And for that, all that, you take personal  
3 blame?

4 A. Yes.

5 Q. You list several witnesses in various  
6 documents that have been given to us. Ron Killings,  
7 why is he listed?

8 A. Because he was a witness to some of the  
9 stuff that happened, and he was also a recipient of  
10 some of the racial epithets and discrimination.

11 Q. What did he observe, to your knowledge?

12 A. He was with me at the door when they said  
13 no minorities allowed or no brownies allowed. And  
14 Jeff told him the day I didn't show up for work, I'll  
15 just go to the park and find another drunken Puerto  
16 Rican. And he also did cocaine with Jeff. And he  
17 brought cocaine for Jeff. And, you know, and he  
18 called Ronnie also derogatory names.

19 Q. Anything else?

20 A. No.

21 Q. Any knowledge that he has that you believe  
22 is somehow relevant to this case other than what you  
23 have just described?

24 A. Just issues between him and Jeff but  
25 that's their, you know.

1 Q. That's not your deal, and that's not what  
2 you were offended by. That's between he and Jeff?

3 A. No. I was offended by what Jeff would  
4 tell him because that was one of my friends. That  
5 was a friend.

6 Q. All right. I'm going to ask you about  
7 that more, but it's going to be the next time we meet  
8 possibly, the next time this deposition continues.

9 Mr. Steiner, what does he have knowledge  
10 about, if anything?

11 A. Well, he was the one that told me that  
12 they paid for his operation when he got kicked in the  
13 throat, which, you know, angered me because I was  
14 under basically the same contract he was and, you  
15 know, I wasn't taken care of.

16 Q. Anything else?

17 A. No.

18 Q. Mr. Waltman, what does he have knowledge  
19 of, to your knowledge?

20 A. Just about everything that Ron Killings  
21 witnessed.

22 Q. What things doesn't he have knowledge of  
23 that Ron does?

24 A. I think everything that Ron does he does.

25 Q. And no more?

1 A. He may know more, you know, I don't know.

2 Q. You had conversations with all these  
3 folks, right?

4 A. Yes.

5 Q. Mr. Melendez, what does he?

6 A. He was one of the guys that was at the  
7 door with me when he said no minorities, no brownies,  
8 also did, you know, drugs with Jeff.

9 Q. Anyone else, I mean, anything else that he  
10 knows of that you --

11 A. He was kind of their inner circle. So he  
12 would probably know a lot more than Ronnie or even  
13 Shawn.

14 Q. Has he told you what he knows?

15 A. No.

16 Q. What does Mr. Hernandez know?

17 A. Hernandez.

18 Q. Shawn Hernandez.

19 A. Shawn Hernandez, yeah. Well, he knows  
20 that I was given pain pills and --

21 Q. By whom?

22 A. By Dutch.

23 Q. He saw it?

24 A. Yes. He probably isn't going to testify  
25 so that now I'm pretty sure, but he was privy to

1 that.

2 Q. Did anyone else observe that?

3 A. Ronnie; Shawn; Jack Miller; Hector, Hector  
4 Melendez; Ted Hart; those are the -- yes.

5 Q. That's it?

6 A. Yes.

7 Q. Mr. Erazo, what does he have knowledge of?

8 A. Erazo, he was also adamant about not  
9 getting whipped when we were getting whipped and that  
10 Jeff reneged on the payment for my hip operation.

11 Q. Anything else?

12 A. I mean, everything -- I usually told him  
13 everything. So he heard a lot of stuff also from me,  
14 you know.

15 Q. But not -- he didn't personally observe  
16 anything other than what -- other than the whipping  
17 and what else? What else? You just testified to the  
18 whipping, and what else?

19 A. The whipping.

20 Q. Oh, the hip --

21 A. Yeah.

22 Q. -- and the promise to pay?

23 A. Yes.

24 Q. Okay. Anything else?

25 A. No.

1 Q. Scott D'Amore, what knowledge does he  
2 have, if anything?

3 A. He's a guy that Jeff Jarrett told that he  
4 wasn't going to go the nigger route and the other  
5 stuff I told you (indicating).

6 Q. Tell me now, but don't tell me what you  
7 told him. Just tell me the answer to my question.

8 A. Just basically that he had heard, you  
9 know, racial slurs when they had the booking  
10 committees when they would get together, creative  
11 would get together, he heard racial slurs.

12 Q. When did he tell you that?

13 A. Right before I left and after I left.

14 Q. You have talked to him since you left?

15 A. Yes.

16 Q. When is the last time you talked to  
17 Mr. D'Amore?

18 A. Maybe January.

19 Q. Do you have any communications between you  
20 and him, e-mails or anything else?

21 A. No. I use the phone.

22 Q. Do you have any e-mails between you and  
23 any of these folks concerning what they may or may  
24 not testify to?

25 A. I've given them all to Cary and his

1 secretary, assistant.

2 Q. Does Raven have any knowledge regarding  
3 this case or the issues in this case?

4 A. Raven, no.

5 Q. Johnny Devine?

6 A. Yes.

7 Q. What does he know?

8 A. He said he heard racial epitaphs.

9 Q. When?

10 A. He didn't tell me the date, but he said he  
11 heard them say beaners and wetbacks and I don't know  
12 what else.

13 Q. When did he tell you that?

14 A. About three months ago.

15 Q. Anything else that he knows, to your  
16 knowledge?

17 A. No.

18 Q. Saboo, does he know anything?

19 A. No.

20 Q. Jess Ward, does he know anything?

21 A. I don't know.

22 Q. Do you know who Jess Ward is?

23 A. Yeah.

24 Q. Bill Barron, do you know of anything that  
25 he's knowledgeable about that's relevant to this



1 case?

2 A. No.

3 Q. Monty Brown?

4 A. Yes.

5 Q. What does he know, if anything?

6 A. Well, he left because he thought he was  
7 racially disrespected.

8 Q. Did he quit?

9 A. Yes.

10 Q. He wasn't let go, right?

11 A. I believe he quit.

12 Q. Do you know who Michael Weaver or Jason  
13 Powell is?

14 A. Michael Weaver, I don't know who that is.

15 Q. Do you know who Jason Powell is?

16 A. Yes.

17 Q. Is he a writer?

18 A. Yes.

19 Q. What knowledge does he have, if anything?

20 A. Well, they call, wrestlers call and give  
21 him information, you know, what's happening in the  
22 locker rooms and stuff like that and then he writes  
23 it in like a little newsletter. So I am sure he  
24 knows a lot.

25 Q. Do you think he's a reliable source of