

# **EXHIBIT 4**

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

CASE NO.: 24-cv-6563 (LJL)

RUBY FREEMAN and WANDREA' MOSS,

Plaintiffs,

-vs-

RUDOLPH W. GIULIANI,

Defendant.

\_\_\_\_\_ /

West Palm Beach Marriott  
1001 Okeechobee Blvd  
West Palm Beach, FL 33401

DATE: Thursday, December 26, 2024  
TIME: 4:06 p.m. - 5:42 p.m.

VIDEO DEPOSITION OF MONSIGNOR ALAN PLACA

Taken on behalf of the PLAINTIFFS before  
Jennifer L. Bush, RPR, Notary Public in and for the State  
of Florida at Large, pursuant to Notice of Taking  
Deposition in the above cause.

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A P P E A R A N C E S  
APPEARING ON BEHALF OF THE PLAINTIFFS:

Meryl C. Governski, Esquire  
Joanna Lamberta, Esquire  
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APPEARING ON BEHALF OF THE DEFENDANTS:

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Also Present:

Chris Gendron, Videographer

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1 THE VIDEOGRAPHER: Good afternoon. We're  
2 going on the record at 4:06 p.m. on December 26,  
3 2024. Please note the microphones are sensitive  
4 and may pick up whispering and private  
5 conversations. Please mute your phones at this  
6 time. Audio and video recording will continue to  
7 take place unless all parties agree to go off the  
8 record.

9 This is Media Unit 1 of the video-recorded  
10 deposition of Alan Placa taken in the matter of  
11 Ruby Freeman, et al. versus Rudolph W. Giuliani  
12 taken -- the location of the deposition is West  
13 Palm Beach Marriott, 1001 Okeechobee Boulevard,  
14 West Palm Beach Florida.

15 My name is Chris Gendron. I'm the  
16 videographer. The court reporter is Jennifer Bush  
17 from the firm Veritext Legal Solutions.

18 Will counsel please introduce themselves  
19 and state whom they represent, after which the  
20 court reporter will please swear in the witness.

21 MS. GOVERNSKI: Meryl Governski, Willkie  
22 Farr & Gallagher, on behalf of plaintiffs.

23 MS. LAMBERTA: Joanne Lamberta, Willkie  
24 Farr & Gallagher, on behalf of plaintiffs.

25 MR. NATHAN: Aaron Nathan, Willkie Farr &

1 Gallagher, on behalf of plaintiffs.

2 MR. CAMMARATA: Joseph Cammarata on behalf  
3 of Rudolph W. Giuliani.

4 WHEREUPON,

5 MONSIGNOR ALAN PLACA,  
6 called as a witness on behalf of the PLAINTIFFS, after  
7 having been first duly sworn, was examined and testified  
8 as follows:

9 THE WITNESS: I do so swear.

10 DIRECT EXAMINATION

11 BY MS. GOVERNSKI:

12 Q. Sir, will you please state your full name  
13 for the record?

14 A. Sure, it's Alan, A-L-A-N, Placa, P-L-A-C-A.

15 Q. And if I refer to you as Monsignor Placa,  
16 is that --

17 A. That's just fine.

18 Q. Okay. Thank you. Monsignor Placa, you are  
19 here without a lawyer; is that accurate?

20 A. That's correct.

21 Q. Do you have a lawyer who's representing you  
22 in this matter?

23 A. I don't.

24 Q. Mr. Cammarata is present. You understand  
25 that he is here as the legal representative for the

1 defendant Rudolph W. Giuliani in this case?

2 A. I understand that.

3 Q. And Mr. Cammarata does not represent you?

4 A. Yes.

5 Q. Have you spoken with Mr. Cammarata before  
6 today?

7 A. No.

8 Q. Have you had any conversations with him  
9 before today?

10 A. No, nothing.

11 Q. When we sat down, you had referenced some  
12 sort of a note from Mr. Cammarata. Did he send you a  
13 note before you arrived here today?

14 A. I think I had an email saying that he would  
15 be here, yeah.

16 Q. And what did he tell you in that email?

17 A. Just that he'd be here.

18 Q. Okay. Any other conversations with  
19 Mr. Cammarata?

20 A. No.

21 Q. Monsignor Placa, have you been deposed  
22 before?

23 A. I'm an attorney, so yes, I've gone through  
24 this several times.

25 Q. Have you been the deponent before?

1 A. Yes, I have.

2 Q. Okay. About how many times?

3 A. I would guess five.

4 Q. Okay. And you understand that you are  
5 under oath today?

6 A. I do.

7 Q. Okay. And you understand that the  
8 testimony that you give today carries the same weight as  
9 testimony before a judge or a jury?

10 A. I understand.

11 Q. Is there any reason why you may not be able  
12 to give your full and accurate testimony today?

13 A. No, none.

14 Q. Is there any reason why your memory might  
15 be less sharp than usual today?

16 A. Not unusual, no.

17 Q. Do you have any physical or mental  
18 conditions that would prevent you from giving fair and  
19 accurate testimony today?

20 A. No.

21 Q. As you know, everything we say is being  
22 transcribed by a court reporter. For the court  
23 reporter's benefit, please answer my questions verbally.  
24 Rather than shaking a head, say yes or no.

25 A. I will.



1 Q. Also, let's try not to speak over each  
2 other for the court reporter's ease of her ability to do  
3 her job. Is that okay?

4 A. Sounds good.

5 Q. If at any time you need a break, you need  
6 water, you need to use the restroom, please just let me  
7 know. Throughout the deposition, Mr. Cammarata may  
8 object to certain of my questions. Unless he objects on  
9 the basis of privilege, you understand that you --  
10 actually, unless he objects on the basis of his client's  
11 privilege, you understand that you would have to answer?

12 A. I do.

13 Q. Okay. Monsignor Placa, how did you prepare  
14 for this deposition?

15 A. I didn't.

16 Q. Did you review any documents to prepare for  
17 this deposition?

18 A. I did not. I have no documents to review.

19 Q. Did you get any videos to refresh your  
20 recollection?

21 A. No.

22 Q. Did you take any notes in preparing for  
23 your deposition today?

24 A. No.

25 Q. Did you discuss the deposition with anyone

1 in advance?

2 A. No.

3 Q. The first you heard of this deposition is  
4 when Mr. Cammarata sent you that note saying he would be  
5 here?

6 A. That is correct.

7 Q. You did not have any conversations with  
8 Mr. Giuliani about this deposition?

9 A. No.

10 Q. How often do you speak with Mr. Giuliani?

11 A. Several times a week.

12 Q. How do you speak?

13 A. On the phone usually. If he's here in Palm  
14 Beach, then I often visit his apartment.

15 Q. And so you -- you speak over -- via cell  
16 phone?

17 A. Yes.

18 Q. Okay. And you call him?

19 A. Sometimes. And he calls me sometimes.

20 Q. What -- do you happen to know his phone  
21 number that you use to call him?

22 A. I don't.

23 Q. You just use the --

24 A. I don't know anyone's phone number.

25 Q. I understand. You're in good company.

1                   So you just use whatever number is your  
2 phone?

3                   A.       That's exactly right.

4                   Q.       We'll try not to speak over each other for  
5 the court reporter's benefit.

6                   Monsignor Placa, do you text message  
7 Mr. Giuliani?

8                   A.       No.

9                   Q.       Do you email him?

10                  A.       Sometimes.

11                  Q.       What email address do you email him at?

12                  A.       I don't know.

13                  Q.       Okay. What email do you use to communicate  
14 with him?

15                  A.       My own email is APlaca@aol.com.

16                  Q.       An AOL email address. Do you ever email  
17 Mr. Giuliani with any other email addresses?

18                  A.       I don't.

19                  Q.       And how often would you say you email him  
20 as opposed to call him?

21                  A.       I would say very rarely.

22                  Q.       And when you speak -- you said you speak to  
23 him multiple times a week?

24                  A.       Usually, yeah.

25                  Q.       Okay. Are those for long conversations at

1 a time?

2 A. Very short.

3 Q. Okay. What do you usually speak with him  
4 about?

5 A. It's usually to set up an appointment to  
6 meet with one another for lunch or for me to go to his  
7 apartment.

8 Q. Okay. And do you know when Mr. Giuliani  
9 will be in West Palm Beach in advance?

10 A. Oh, yes.

11 Q. How do you know that?

12 A. He'll tell me, I'll be down. Often enough.  
13 See, I live with another retired priest who has had two  
14 strokes. So setting things up becomes more complicated  
15 because I have to see that he's taken care of in order to  
16 leave.

17 Q. So -- so Mr. Giuliani gives you a heads-up  
18 exactly when he'll be in town?

19 A. Exactly.

20 Q. And then you can coordinate your outings?

21 A. That's correct.

22 Q. And when he is in town, how often do you  
23 see him?

24 A. I would say perhaps twice a month.

25 Q. Okay. And usually how far in advance does

1 he tell you he's coming into town?

2 A. Oh, I do know his schedule. I mean, I'd  
3 have to look at my emails to see it. But I do know his  
4 schedule, so I always know when he's in town.

5 Q. So you referenced your emails. How do your  
6 emails help inform what his schedule is?

7 A. I -- I make notes on my -- on my phone --  
8 on my -- on the emails on my phone so that I know when  
9 he'll be here and when I had the opportunity to see him.

10 Q. I understand. So you have a calender or  
11 something --

12 A. Exactly right.

13 Q. So -- where you put in when you know he's  
14 coming.

15 And usually he'll call you and say, I'm  
16 heading into town on X date, and you'll input that into  
17 your calendar?

18 A. Yes.

19 Q. Okay. And you bought a place in Palm Beach  
20 in August 2013; is that right?

21 A. Sounds right.

22 Q. Okay. Did you buy it as a vacation home?

23 A. No, I moved here then.

24 Q. Okay.

25 A. Yeah.

1 Q. So when you moved here, you meant that this  
2 was your permanent residence?

3 A. Yes.

4 Q. Okay. And -- and what does it mean to you  
5 when you say "you moved here," like -- as opposed to when  
6 I asked you, "Is it your vacation home," you said, "No, I  
7 moved here," what's the difference between those two in  
8 your mind?

9 A. Well, a vacation home, you come back and  
10 forth. I -- I -- when I bought the residence here --  
11 actually, let -- let me just be clear about this for  
12 myself:

13 When I first bought my first apartment  
14 here, I came down for part of the year. But once I  
15 bought this house, the house where I live now, I've been  
16 a permanent residence.

17 Q. So when you refer to the "first  
18 apartment" --

19 A. Yes.

20 Q. -- was that what you bought in August 2013  
21 or is it the current home that you bought in 2013?

22 A. No, it was the apartment.

23 Q. Okay.

24 A. I've been in this house, I believe, for  
25 seven years.

1 Q. Okay. So seven years would be 20 -- '19 --  
2 '18?

3 A. Seven -- well --

4 Q. 27- -- around 2017.

5 A. Well, seven and seven is 14. Yeah.

6 Q. I'm a lawyer; I'm not a mathematician,  
7 obviously.

8 Okay. So when you said that you moved  
9 here, in 2013 did you move here or was it in 2017 that  
10 you moved here?

11 A. I consider my move to be 2017 when I took  
12 up permanent residence here.

13 Q. Okay. And what -- can you explain a little  
14 bit about that difference.

15 Like, during those five years, what -- what  
16 were -- what was your relationship with the -- with Palm  
17 Beach between 2013 and when you moved here in 2017?

18 MR. CAMMARATA: I'm going to object to the  
19 form --

20 BY MS. GOVERNSKI:

21 Q. Okay.

22 MR. CAMMARATA: -- of the question.

23 By MS. GOVERNSKI:

24 Q. You can answer.

25 A. Those -- those first few years, I

1 maintained my home in New York and I came here for part  
2 of the year.

3 Q. How often did you come here?

4 A. I would say I came once a year and stayed  
5 for several months.

6 Q. And -- and about when would you come?

7 A. When the weather got cold in New York.

8 Q. Kind of what they call a "snowbird"?

9 A. Exactly.

10 Q. So like in the winter months --

11 A. Yes.

12 Q. -- you would come here for an extended  
13 period of time. Is that right?

14 A. Yes.

15 Q. And then in 2017 is when you started to not  
16 go back and forth?

17 A. That's right.

18 Q. Okay. And what prompted you to relocate  
19 here to Palm Beach in 2017?

20 A. I liked it.

21 Q. And Mr. Giuliani at that point had an  
22 apartment in Palm Beach, right?

23 A. He did.

24 Q. Did that influence your decision to move  
25 here?



1           A.     Yes, and because -- and then I had a friend  
2 nearby.

3           Q.     And how often -- do you still own homes in  
4 other places?

5           A.     I don't.

6           Q.     Okay. Do you ever leave Palm Beach?

7           A.     I haven't been out of Palm Beach in seven  
8 years.

9           Q.     Okay. And you had mentioned -- oh, when we  
10 refer to Mr. Giuliani's condo, will you understand I am  
11 referring to the condo he owns on South Lake Drive?

12          A.     Indeed.

13          Q.     You referred to -- you said earlier that  
14 you've been to his condo.

15                   Is -- is that the condo you are referring  
16 to?

17          A.     Yes, indeed.

18          Q.     Okay.

19          A.     Yes.

20          Q.     So if I refer to "condo," you'll understand  
21 that's what I'm talking about.

22          A.     Mm-hmm.

23          Q.     So let's go back to when you -- the years  
24 between 2013 and 2017 when you were only here as a  
25 snowbird in the -- in the winter months.

1 Did you have personal knowledge about how  
2 much -- how often Mr. Giuliani was in Palm Beach during  
3 those years?

4 A. If I did, I've forgotten.

5 Q. Okay. So you don't have any personal  
6 knowledge about the period in time before 2017?

7 A. Not in my memory, no.

8 Q. Okay. And -- so what is your earliest date  
9 that you can recall -- scratch that.

10 We talked about whether you had personal  
11 knowledge of Mr. Giuliani's time in Palm Beach between  
12 2013 and 2017 and you said, "not in your memory."

13 So when is the earliest time period when  
14 you have personal knowledge about Mr. Giuliani's  
15 relationship with Palm Beach?

16 MR. CAMMARATA: I'm going to object to the  
17 form.

18 BY MS. GOVERNSKI:

19 Q. You can answer.

20 A. When I moved here myself.

21 Q. 2017?

22 A. Right.

23 Q. Okay. So let's go back to just 2017,  
24 around that time.

25 What is your recollection of how

1 Mr. Giuliani used his Palm Beach condo at that point?

2 A. My recollection is that he used it quite  
3 regularly and I visited him there quite regularly.

4 Q. What does "quite regularly" mean to you?

5 A. I would visit him there, I would say,  
6 several times a month, three times a month.

7 Q. Three times a month.

8 During which months?

9 A. The months when I was here.

10 Q. But in -- I'm sorry, I thought we were  
11 talking about in 2017 when you were here all the time.

12 A. Oh, yes. Oh, then I -- if we're talking  
13 about that period of time, then I would see him quite  
14 regularly, meaning a couple of times a month -- and what  
15 was the question?

16 Q. Let's start -- let's go -- let's go back  
17 if -- if -- I think we're confusing dates and I just want  
18 to make sure --

19 A. Okay.

20 Q. -- we're both on the same page.

21 A. Uh-huh.

22 Q. So during the period of time between 2013  
23 and 2017, when you were not living here full time --

24 A. Uh-huh.

25 Q. -- do you have any personal knowledge about

1 how often Mr. Giuliani was here in Palm Beach?

2 A. I have no memory of it. No.

3 Q. You have no memory of that?

4 A. Right.

5 Q. So when you talked about seeing him when  
6 you were in town, what was that in reference to? Because  
7 you -- you had said well, when I saw him, "when I was in  
8 town, I would see him."

9 But you were in town all the time after  
10 2017 --

11 A. That's correct.

12 Q. -- so I'm just trying to understand that  
13 testimony.

14 A. What don't you understand? I'm sorry.

15 Q. Okay. So the period before 2017 --

16 A. Uh-huh.

17 Q. -- you were here seasonally?

18 A. Right.

19 Q. And it's your testimony that you have no  
20 recollection about how often Mr. Giuliani was here prior  
21 to --

22 A. I don't --

23 Q. -- 2017?

24 A. -- remember. Right.

25 Q. Okay. So I'm going to ask you questions

1 from 2017 forward which is when you were here all the  
2 time, right?

3 A. Uh-huh.

4 Q. Okay. So what is your recollection --  
5 let's go back right around 2017, right around when you  
6 bought your current residence, okay?

7 A. Uh-huh.

8 Q. During that time, those early years, how  
9 often would you see Mr. Giuliani in Palm Beach?

10 MR. CAMMARATA: Objection to the form.

11 THE WITNESS: I would say I'd see him,  
12 perhaps, three times a month.

13 BY MS. GOVERNSKI:

14 Q. During what months?

15 A. During what months?

16 Q. Yeah, so in 2017 when you were living  
17 here --

18 A. Right.

19 Q. -- year around, would you see him three  
20 times a month every month of the year?

21 A. Yes.

22 Q. So he -- Mr. Giuliani was in Palm Beach  
23 every month of the year --

24 A. No, no.

25 Q. -- in 2017?

1 A. I'm sorry. No, I'm sorry. He was not.

2 So I would see him and I can't tell you  
3 which months because I don't remember his schedule, but I  
4 would see him -- when he was here, when he was in Palm  
5 Beach, I would see him about three times a month.

6 Q. Okay. What is the best of your  
7 recollection in those 2017 early years about how many  
8 times a year he was here in Palm Beach?

9 A. I don't remember.

10 Q. What about, let's say, 2019, right before  
11 COVID. Do you have any recollection about -- about that  
12 year and how often you saw Mr. Giuliani in Palm Beach?

13 A. Not specifically, no.

14 Q. Okay. So you have no recollection about  
15 the year 2019 --

16 A. No.

17 Q. -- and how often Mr. Giuliani was here?

18 A. I don't.

19 Q. Okay. Over the years, do you recall  
20 celebrating Mr. Giuliani's birthday with him?

21 A. Sure.

22 Q. His birthday is in May, right?

23 A. In May.

24 Q. Okay. And where did you celebrate his  
25 birthday?

1 A. Usually in a restaurant.

2 Q. In Palm Beach?

3 A. Yes.

4 Q. Was he often in Palm Beach on his birthday?

5 A. Yes, often. Not always but often.

6 Q. Okay. Do you have any specific  
7 recollections of any birthday parties in Palm Beach that  
8 you attended?

9 A. No, no.

10 Q. Did you ever travel to New York for any of  
11 his birthday parties?

12 A. No.

13 Q. Okay. What about Christmas, would he  
14 celebrate Christmas in Palm Beach?

15 A. When he was here, yes.

16 Q. Well, so I'm asking. Would he be here for  
17 Christmas, generally?

18 A. I can't -- I don't remember that.

19 Q. You don't have any recollection?

20 A. No.

21 Q. Could you estimate in your experience  
22 between 20- -- let's say 2017 through 2019, which we've  
23 talked about; do you have any recollection about how many  
24 times Mr. Giuliani was in Palm Beach during that time  
25 period?

1 A. No.

2 Q. Okay. What do you do when he -- when he's  
3 here? You said you see him three times a month. What do  
4 you do with him?

5 A. Sit, talk, smoke cigars and drink single  
6 malt Scotch.

7 Q. In his condo for the most part?

8 A. Yes, often enough.

9 Q. Do you ever do any activities outside of  
10 the condo?

11 A. We go to a restaurant occasionally, but  
12 usually we visit at his house.

13 Q. Okay. And usually you go to him?

14 A. Yes, that's right.

15 Q. Does he ever come to you?

16 A. He's come to my house once or twice, yeah.

17 Q. Does he drive to you?

18 A. I think he has a driver.

19 Q. Have you ever seen him drive?

20 A. No.

21 Q. Do you know if he drives?

22 A. I don't know that.

23 Q. Okay. And over the course of your  
24 friendship, has he ever driven?

25 A. Oh, sure.



1 Q. Okay. But not recently?

2 A. I've not seen him drive recently.

3 Q. Okay. What about social clubs, do you ever  
4 go to social clubs with him here in Palm Beach?

5 A. No.

6 Q. What about church, does he go to church on  
7 -- here on Palm Beach?

8 A. Not with me.

9 Q. Not with you.

10 A. He's often come to mass at my house. We  
11 have -- again, I live with another retired priest and we  
12 have mass at home and he's often joined us for mass at  
13 home.

14 Q. And when you say "often joined" you, like  
15 how -- what does that mean?

16 A. I mean I don't know how often it is. It's  
17 maybe four or five times in my life that he's had mass  
18 with us.

19 Q. And when, around? Around when?

20 A. No recollection of that.

21 Q. Okay. Recently?

22 A. No, not recently, no.

23 Q. Okay. When is the -- when is the most  
24 recent time you've been at his condo?

25 A. I'd say in the last three months I've been

1       there and more than once.

2               Q.     Okay. Let's talk about that.

3               A.     Okay.

4               Q.     So the last three months, it's December  
5       now. So let's say September -- well, you tell me. So  
6       when do you recall being there in the last three months?

7               A.     Well, I was there -- we're now in December.  
8       I would say I was there in October. And also in  
9       November.

10              Q.     Okay. So you were there in October and  
11       November. What about before then? When is -- when is  
12       the last time you were there -- were you there at all  
13       earlier this year?

14              A.     Oh, yes.

15              Q.     When else? Let's talk about 2024. When  
16       else were you at his condo in Florida?

17              A.     I don't recollect any specific dates when  
18       you say that, but I certainly was there in October and in  
19       November.

20              Q.     Okay. Can you recall any other dates this  
21       year --

22              A.     No.

23              Q.     -- you were there? What about in 2023, can  
24       you recall any times that you were there in 2023?

25              A.     Yes, I mean, I can recall times. I can't

1 recall the dates. I remember times being there.

2 Q. Okay. About how many times do you think  
3 you were there in 2023?

4 A. I would say five or six times.

5 Q. Mr. Giuliani has submitted signed  
6 interrogatories saying that he, quote, "used the Palm  
7 Beach condo as a vacation home" for the majority of his  
8 ownership of it.

9 Do you have any reason to disagree with  
10 that description?

11 MR. CAMMARATA: I'm going to object to that  
12 question.

13 BY MS. GOVERNSKI:

14 Q. You can answer.

15 A. Would you repeat the question?

16 MR. CAMMARATA: Actually, do you have the  
17 interrogatory? Rather than quoting it, I'd like  
18 to see it and maybe Mr. Placa would.

19 MS. GOVERNSKI: That's not a proper  
20 objection. You can state your object- --

21 MR. CAMMARATA: Well, you could be  
22 paraphrasing.

23 MS. GOVERNSKI: Joe, you are not allowed to  
24 do speaking objections.

25 MR. CAMMARATA: Okay. I'm going to object

1 to that.

2 MS. GOVERNSKI: That's fine.

3 BY MS. GOVERNSKI:

4 Q. Monsignor Placa, I'll repeat it.

5 Mr. Giuliani has submitted signed  
6 interrogatories saying that he "used the Palm Beach condo  
7 as a vacation home," end quote, for the majority of his  
8 ownership of it.

9 Do you have any reason to disagree with  
10 that description?

11 A. No, the only -- the only hesitancy I have  
12 is that I think he's used it much more frequently since  
13 it's become his home. Earlier, he visited it.

14 Q. Okay. Well, let's break that apart. You  
15 said, "he's used it much more frequently since it's  
16 become his home." What is your understanding of when  
17 it's become his home?

18 A. I think it became his full-time home, in  
19 other words, he didn't have another home, early in 2023.

20 Q. Early -- around when in 2023?

21 A. I can't be more specific. I don't  
22 remember.

23 Q. First half of 2023, second half of 2023?

24 A. First half.

25 Q. First half of 2023?

1 A. Yeah.

2 Q. Okay. And you said that that understanding  
3 was based on, you said he used it much more frequently in  
4 the first half of 2023; is that right?

5 A. That's correct.

6 Q. What is your recollection of how he used it  
7 more frequently beginning in the first half of 2023?

8 A. I'm not sure I know what you mean by "how  
9 he used it."

10 Q. Sure. So you said that he -- you said --  
11 let me read what you said. You said, "I think he's used  
12 it much more frequently since it's become his home."

13 So I'm just asking you what you mean by  
14 saying he used it "much more frequently."

15 A. He lives there.

16 Q. And so what does that mean to you, that "he  
17 lives there"?

18 MR. CAMMARATA: Objection to the form.

19 THE WITNESS: He doesn't -- as far as I  
20 know, he doesn't have another home.

21 BY MS. GOVERNSKI:

22 Q. So I'm just trying to understand your  
23 testimony. So is it your testimony that beginning in the  
24 first half of 2023, Mr. Giuliani lived in his Palm Beach  
25 condo as his only home?

1 A. That's my understanding, right.

2 Q. Okay. And what is that understanding based  
3 on?

4 A. On my knowledge of him, my conversations  
5 with him, my visiting him.

6 Q. Okay. Tell me about your conversations  
7 with him about -- beginning in early 2023 about his use  
8 of his Palm Beach condo?

9 MR. CAMMARATA: Objection to the form.

10 THE WITNESS: I don't have specific  
11 recollection. Repeat your question, please.

12 BY MS. GOVERNSKI:

13 Q. Sure. I said what is your recollection of  
14 how he used the Florida condo more frequently beginning  
15 in the first half of -- well, you know what, I'm sorry.  
16 My realtime is not caught up.

17 I said you've referred to your having  
18 conversations with him. And I said tell me about your  
19 conversations with him about -- beginning in early  
20 2023 -- let me rephrase the question. That was not a  
21 good question.

22 A. Okay.

23 Q. Monsignor Placa, you referred to  
24 conversations you had with Mr. Giuliani regarding his use  
25 of his Florida condo in early 2023. Do you recall that?

1 A. I do.

2 Q. Tell me about what you recall about those  
3 conversations.

4 A. Nothing.

5 Q. You have no recollection?

6 A. No.

7 Q. So what about those conversations led you  
8 to believe that he intended to establish Palm Beach as  
9 his home beginning in early 2023?

10 A. He told me that was his intention. Again,  
11 I don't travel because of my situation and the priest I  
12 live with. I haven't been up to New York in at least  
13 seven years. So, I mean, I've lost my way. But he -- I  
14 knew that he -- I knew that he was moving down.

15 Q. And how certain are you that you had those  
16 conversations in early 2023?

17 A. Oh, I'm certain that we discussed this in  
18 early 2023, yeah.

19 Q. Do you have any certainty about when in  
20 early 2023?

21 A. No. I'm sorry, no.

22 Q. Okay. Do you recall where you were when  
23 you had those conversations?

24 A. No.

25 Q. Was it over the phone or in person?

1 A. Sometimes over the phone, often in person.

2 Q. You said that he told you that he intended  
3 to live in Palm Beach. What do you recall about what he  
4 exactly told you?

5 A. That he would be moving out of his New York  
6 apartment and coming to live full time in the Palm Beach  
7 apartment.

8 Q. And in your personal experience, has that  
9 occurred, has he moved out of his New York apartment and  
10 started coming to live full time in Palm Beach beginning  
11 in early 2023?

12 MR. CAMMARATA: Objection to the form.

13 THE WITNESS: That's my understanding,  
14 that -- my recollection is that he -- again, I  
15 don't know the situation of his New York  
16 apartment. I don't know if he even still owns it.  
17 I don't know that. But I do know that in early  
18 2023, he was on his -- he was moving here.

19 BY MS. GOVERNSKI:

20 Q. And you are certain about that that  
21 conversation occurred in 2023?

22 MR. CAMMARATA: Objection, asked and  
23 answered.

24 THE WITNESS: Yes.

25



1 BY MS. GOVERNSKI:

2 Q. Monsignor Placa, focusing just on 2023 --

3 A. Okay.

4 Q. -- how often do you recall seeing him here  
5 once he had decided to make Palm Beach his home?

6 A. I think about twice a month.

7 Q. So twice a month throughout 2023?

8 A. Yes.

9 Q. Okay. So probably that's about 24 times,  
10 give or take, in 2023. Is that right?

11 A. Yes, that's correct.

12 Q. Do you recall whether he celebrated his  
13 birthday here in 2023?

14 A. I don't.

15 Q. Okay. What about Christmas last year, do  
16 you recall if he was here for Christmas last year?

17 A. I don't think he was, no.

18 Q. Okay. Do you have any specific memories  
19 of -- of time that you spent with him in 2023 in Palm  
20 Beach?

21 A. Yes.

22 Q. Can you tell me about them?

23 A. What would you like me to tell you? We  
24 visit. Again, we've been friends since 9th grade, which  
25 I promise you, is a long time ago but -- and so we catch

1 up on old times. We talk about the family, his family  
2 and mine.

3 You asked about Christmas. You see -- I  
4 think most years for holidays like Thanksgiving or  
5 Christmas, he's up in New Hampshire and then I see him  
6 when he's down here.

7 Q. So when you say "most years," I mean, how  
8 far back has that been that's he's been having  
9 Thanksgiving, Christmas in New Hampshire?

10 A. I couldn't say, I'm sorry. And that's --  
11 the problem is my recollection. I just don't recall.

12 Q. But at least the last few years?

13 A. Oh, yes, absolutely.

14 Q. Okay. Certainly in 2023?

15 A. Oh, absolutely.

16 Q. Okay. Maybe in 2022, do you have any  
17 recollection?

18 MR. CAMMARATA: Objection to form.

19 THE WITNESS: Not a specific recollection.

20 BY MS. GOVERNSKI:

21 Q. And going back to, about your two dozen  
22 meetings in 2023, were most of those in his Florida  
23 condo?

24 A. Yes, indeed.

25 Q. Do you have any recollection of any times

1 that you spent with Mr. Giuliani in 2023 outside of his  
2 Palm Beach condo?

3 A. I have a vague recollection of being, at  
4 least once or twice, in restaurants with him. We often  
5 do that but it's a vague recollection.

6 Q. Okay. So as between 2023 and this year,  
7 2024, has anything changed about the way that  
8 Mr. Giuliani has used his Florida condo?

9 MR. CAMMARATA: Objection to the form.

10 THE WITNESS: I think he's lived here  
11 pretty much full time, certainly in this year.  
12 I'm not sure just when in 2023 it became his  
13 full-time residence but it did at some point.

14 BY MS. GOVERNSKI:

15 Q. So between 2023 and 2024, can you recall  
16 any specific differences between how he's used the  
17 Florida condo?

18 A. No.

19 Q. How -- does he host his kids in his Palm  
20 Beach condo, his kids?

21 MR. CAMMARATA: Objection to the form.

22 THE WITNESS: I think that -- I believe  
23 that Andrew has visited. I don't believe Caroline  
24 has visited.

25

1 BY MS. GOVERNSKI:

2 Q. How often has Andrew visited?

3 A. I couldn't say.

4 Q. Okay. Does he have parties at his Palm  
5 Beach condo?

6 A. If he does, I'm not invited.

7 Q. And -- so you've mentioned, we have talked  
8 a lot about 2023 and that you recall about two dozen  
9 times that you've interacted with him mostly at his  
10 Florida condo. So now I want to focus on 2024.

11 A. Okay.

12 Q. Okay.

13 You have mentioned that you spent time with  
14 him in October and November of this year in his condo. I  
15 want to talk to you about those specific times. But do  
16 you recall any other visits with him in 2024?

17 A. Other than...

18 Q. Other than the two that we've talked about  
19 or that you've mentioned, October and November of 2024.

20 A. I don't remember any specific time. I  
21 certainly have had other visits with him but I don't  
22 remember any specifically.

23 Q. And about how many times do you recall  
24 seeing Mr. Giuliani in person in West Palm Beach in 2024?

25 A. Oh. I don't keep count but I would expect

1 that it was -- usually twice a month, that would be a  
2 normal frequency.

3 Q. Okay. So if you wanted to know, would you  
4 be able to consult your calendar?

5 A. I would be able to.

6 Q. Okay. But you did not consult your  
7 calendar in advance of this deposition, right?

8 A. No, I did not.

9 Q. Okay. And are you aware of how many times  
10 Mr. Giuliani was physically present in Palm Beach this  
11 year?

12 MR. CAMMARATA: Objection to the form.

13 THE WITNESS: As far as I know, he's lived  
14 here this year. This has been his home.

15 BY MS. GOVERNSKI:

16 Q. And what is -- and what is that specific  
17 knowledge based on --

18 MR. CAMMARATA: I'm --

19 BY MS. GOVERNSKI:

20 Q. -- regarding this year?

21 MR. CAMMARATA: I'm going to object. This  
22 question has been asked and answered multiple  
23 times.

24 BY MS. GOVERNSKI:

25 Q. You can answer.

1 A. Repeat the question, please.

2 Q. Sure. I'm asking you specifically about  
3 2024.

4 A. Right.

5 Q. What is your knowledge of his spending 2024  
6 in Palm Beach based upon?

7 A. Conversations with him and visits, visits  
8 to the condo -- visits I've made to his condo with him.

9 Q. So let's talk about 2024. Are you aware of  
10 whether Mr. Giuliani -- well, let's start as recently as  
11 this month.

12 Did Mr. Giuliani spend Christmas in Palm  
13 Beach this year?

14 A. No.

15 Q. Where was he for Christmas?

16 A. He would have been New Hampshire.

17 Q. Because he's in New Hampshire every  
18 Christmas?

19 MR. CAMMARATA: Objection to the form.

20 Asked and answered. He's answered this question  
21 four times already.

22 MS. GOVERNSKI: You can state your  
23 objection.

24 MR. CAMMARATA: And that's fine.

25 MS. GOVERNSKI: And move on.

1 MR. CAMMARATA: But your -- it's now  
2 getting to the point where it's badgering.

3 MS. GOVERNSKI: Joe, you are not listening  
4 to the question.

5 MR. CAMMARATA: You keep asking the same  
6 questions.

7 MS. GOVERNSKI: We're -- I'm asking about  
8 2024. You can object --

9 (Simultaneously speaking.)

10 MR. CAMMARATA: He's answered --

11 MS. GOVERNSKI: -- and stop speaking  
12 objections.

13 MR. CAMMARATA: He's answered it multiple  
14 times.

15 BY MS. GOVERNSKI:

16 Q. Monsignor Placa, I'm asking you about  
17 December of 2024.

18 A. Yeah.

19 Q. You said he was not here for Christmas, he  
20 was in New Hampshire. And my answer was that, "it's  
21 because he spends most Christmases in New Hampshire,"  
22 right?

23 A. I mean, I don't know what "most" means. In  
24 the last few years, he has been there.

25 Q. Okay. And was he here for Thanksgiving?

1 A. No.

2 Q. Okay. So what -- so is the last time you  
3 saw him in November, here?

4 A. Yes.

5 Q. When was that?

6 A. I'm sorry, I don't remember.

7 Q. Before Thanksgiving?

8 A. No, I've seen him since Thanksgiving.

9 Q. So was he here between Thanksgiving and  
10 Christmas?

11 A. Yes.

12 Q. Okay. So let's talk about that.  
13 Around when do you recall seeing him in  
14 November?

15 A. Around -- around November.

16 Q. Okay. After Thanksgiving?

17 A. Yes.

18 Q. Okay. And what do you -- you went to his  
19 apartment --

20 A. Yes.

21 Q. -- his condo?  
22 What do you recall about that visit?

23 A. Nothing. I mean, nothing -- nothing  
24 specific.

25 Q. How long were you there for?



1           A.     My visits are usually are a couple of  
2 hours.

3           Q.     And what did you talk about?

4           A.     God knows.  Honestly, you know, we've been  
5 friends so long, it would be hard to remember any  
6 specific conversation.

7           Q.     Did you have any conversations with him  
8 about this lawsuit?

9           A.     I'm sorry?

10          Q.     Did you have any conversations with him  
11 about this lawsuit?

12          A.     No, not at all.

13          Q.     Did you have any conversations with him  
14 about his intention to declare Palm Beach his permanent  
15 residence?

16          A.     I'm not sure what "declare" means.  I mean,  
17 he's made it his permanent residence.  I'm not sure how  
18 you declare that.

19          Q.     In that November meeting at his condo, did  
20 you talk about his --

21                   MR. CAMMARATA:  Objection to the form  
22 November when?

23                   MS. GOVERNSKI:  You didn't let me finish my  
24 question.  Let me finish speaking.

25                   MR. CAMMARATA:  Yeah, I know but you're --

1           you're --

2                   MS. GOVERNSKI: Let me finish speaking.

3                   (Simultaneously speaking.)

4                   MR. CAMMARATA: Okay.

5 BY MS. GOVERNSKI:

6           Q.       Monsignor Placa, in that November meeting  
7 at his condominium in the beginning of this year or last  
8 month, did you talk with Mr. Giuliani about his intent to  
9 make Palm Beach his permanent residence?

10          A.       You are talking about last month?

11          Q.       Last month.

12          A.       I think it was his permanent -- my  
13 understanding was it was his permanent residence already  
14 last month.

15          Q.       Okay. So my understanding, from your  
16 answer, is that you wouldn't have talked to him about  
17 that --

18          A.       Yes.

19          Q.       -- in November because it already happened?

20          A.       Yeah, it's a given fact.

21          Q.       And so those conversations, when you  
22 referenced his intent to make Palm Beach his permanent  
23 residence, would have occurred in 2023?

24          A.       I'm not sure that I -- that I said  
25 anybody's intent to make Palm Beach his residence. I

1 mean, it was -- it became his residence. He had the  
2 apartment for a long time and then it became his  
3 permanent home.

4 Q. In 2023?

5 A. Yes.

6 Q. Okay. So we talked about November.

7 You recall having a meeting with him in his  
8 Palm Beach condo in October of 2024; is that right?

9 A. I do.

10 Q. What do you recall about that meeting?

11 A. I mean, nothing in particular. It was a  
12 meeting between old friends and I don't recall anything  
13 in particular.

14 Q. Any conversations about this lawsuit?

15 A. No, no. I didn't even know about this  
16 lawsuit, by the way, until very recently.

17 Q. Okay. Any conversations with him about  
18 Palm Beach being his permanent residence in October 2024?

19 A. We had no conversations about that. It  
20 just was a fact. It's a fact of life.

21 Q. Okay. So you -- you mentioned that you see  
22 him about two times -- saw him about two times a month in  
23 2024. Do you have any recollection of any other meetings  
24 with Mr. Giuliani in person throughout 2024, other than  
25 the two that we've discussed?

1 MR. CAMMARATA: Objection to the form.

2 THE WITNESS: I didn't understand  
3 the question at all.

4 BY MS. GOVERNSKI:

5 Q. Sure. We talked about two in-person visits  
6 that you had with Mr. Giuliani in 2024 in October and  
7 November, right?

8 A. In October, yeah.

9 Q. Right. Are there any other in-person  
10 visits in 2024 that you recall with any specificity?

11 A. No.

12 Q. Any conversations in all of 2024 where you  
13 discussed his intent to make Palm Beach his permanent  
14 residence?

15 MR. CAMMARATA: Objection to the form, and  
16 objection, it was asked and answered.

17 THE WITNESS: I don't remember any specific  
18 conversations about his intending to do it. It  
19 became a fact.

20 BY MS. GOVERNSKI:

21 Q. Do you recall having any conversations with  
22 him in 2024 about the fact that he lived in Palm Beach?

23 A. No.

24 Q. How often -- do you have any personal  
25 knowledge about how often Mr. Giuliani was physically

1 present in Palm Beach in 2024?

2 MR. CAMMARATA: Objection to the form.

3 THE WITNESS: To my recollection, he lived  
4 here in 2024. So I don't have any specific  
5 recollection of him being here, apart from his  
6 visits with friends in New Hampshire which is  
7 occasions, Christmas, Thanksgiving. Apart from  
8 that, he's lived here the whole year as far as I  
9 know.

10 BY MS. GOVERNSKI:

11 Q. So you understand that Mr. Giuliani travels  
12 often?

13 A. Oh, sure.

14 Q. Okay. Do you have personal knowledge about  
15 his travel calendar?

16 A. No, I don't.

17 Q. So do you have any understanding of when  
18 he's physically in Palm Beach versus when he's on trips  
19 elsewhere?

20 A. No, no.

21 Q. So you would have no personal knowledge  
22 about how many days he has physically been in Palm Beach  
23 in 2024?

24 A. It's his home. So I don't know -- I mean,  
25 listen. I've known him for a long time. He's always

1 traveled a lot. That never changed my understanding  
2 where his home was. He just travels because of the  
3 nature of his business.

4 Q. Right. So I'm just trying to understand if  
5 you have knowledge of how many days of 2024 he's  
6 physically been in Palm Beach as opposed to traveling in  
7 the course of his work?

8 A. I don't. I don't.

9 Q. And what about for 2023?

10 A. Neither.

11 Q. But in your opinion, the number of days  
12 he's spent in Palm Beach in 2023 and 2024 was roughly  
13 equivalent?

14 A. To each other you mean? Yes.

15 Q. Okay. Mr. Giuliani has admitted that he  
16 did not occupy the Palm Beach condo any time between  
17 June 17th and August 8, 2024. Do you have any reason to  
18 dispute that?

19 A. No.

20 Q. Do you recall seeing him here in the summer  
21 of 2024?

22 A. Not specifically, no.

23 Q. Do you know whether he was here in the  
24 summer of 2024?

25 A. I have no specific recollection, no.

1 Q. So you wouldn't know one way or the other?

2 A. No.

3 Q. The summer of 2024 was around the time of  
4 the Republican National Convention. Do you recall that?

5 A. I remember the convention.

6 Q. Do you recall whether he was in Palm Beach  
7 any time before or after the RNC?

8 A. As far as I know, he was here both before  
9 and before the convention.

10 Q. Okay. But we just talked about that  
11 Mr. Giuliani has admitted that he did not occupy the Palm  
12 Beach condo any time between June 17, 2024, and  
13 August 29, 2024. Do you have any reason to dispute that?

14 A. No.

15 Q. Okay. So when you said that you recall him  
16 being in Palm Beach before or after the RNC, what is that  
17 based on?

18 A. My own recollection of where he was.  
19 Again, I don't keep tabs on him, which would be quite an  
20 operation, by the way. But that's my own recollection.

21 Q. And so it's your testimony that  
22 Mr. Giuliani would know about his whereabouts more than  
23 you would?

24 A. He sure would.

25 Q. Okay. So you said you've been in his

1 condominium about two dozen times in 2023 and about two  
2 dozen times in 2024?

3 A. Roughly.

4 Q. Have you noticed any differences in his  
5 Florida condo between those two years?

6 A. I'm not very observant about such things,  
7 I'm sorry.

8 Q. Have you noticed him moving any new  
9 furniture in or out?

10 A. No.

11 Q. Do you know if he keeps items of  
12 sentimental value in his Florida condo?

13 A. Not specifically, no.

14 MR. CAMMARATA: Objection to the form.

15 BY MS. GOVERNSKI:

16 Q. What about -- you are aware that  
17 Mr. Giuliani is a sports fan, right?

18 A. I sure am.

19 Q. What are his favorite teams?

20 A. New York Yankees.

21 Q. Who is his favorite Yankee player?

22 A. I'm sorry, I don't know.

23 Q. Was he a fan of Joe DiMaggio?

24 A. Oh, he sure was, yeah.

25 Q. How do you know that?



1 A. I just know that.

2 Q. How big of a fan of Joe DiMaggio is  
3 Mr. Giuliani?

4 A. I don't even know how to answer the  
5 question, I'm sorry.

6 Q. Okay. Are you aware that Mr. Giuliani owns  
7 a signed Joe DiMaggio shirt?

8 A. Yes, in fact, I do know that, yeah.

9 Q. How do you know that?

10 A. He's shown it to me and I've heard him  
11 speak about it.

12 Q. When -- when has he shown it to you?

13 A. Oh, God, I don't remember.

14 Q. Why do you recall him showing it to you,  
15 what -- what makes it stick out in your memory?

16 A. I'd never seen a Joe DiMaggio shirt before  
17 or since.

18 Q. Do you have any recollection of around when  
19 that was?

20 A. No.

21 Q. Where were you when he showed it to you?

22 A. At his home.

23 Q. What home?

24 A. At the apartment -- actually, it was here  
25 in Florida.

1 Q. It was here in Florida?

2 A. Yeah.

3 Q. Did he keep it here in Florida?

4 A. I can't answer that. I don't know what  
5 "keep it" means. That's certainly where I saw it.

6 Q. You saw it here in Florida. Can you  
7 ballpark what year that might have been?

8 A. No.

9 Q. This past year?

10 MR. CAMMARATA: Objection. He answered the  
11 question.

12 THE WITNESS: Certainly within the last two  
13 years.

14 BY MS. GOVERNSKI:

15 Q. Within the last two years you've seen the  
16 Joe DiMaggio shirt here in Florida?

17 A. That's right.

18 Q. Is it framed, by the way?

19 A. It was, yeah, when I saw it, yeah.

20 Q. When you saw it, it was framed?

21 A. Uh-huh.

22 Q. Was it hanging on a wall?

23 A. I believe it was, yeah.

24 Q. In the Florida condo?

25 A. That's my recollection.

1 Q. In the past couple years?

2 A. Yes, in the last two years certainly.

3 Q. Okay. Does he keep any other valuables  
4 like that here in Florida?

5 A. I really don't know.

6 Q. Have you ever seen the Yankees -- well, are  
7 you -- scratch that.

8 Are you aware that he owns some Yankees  
9 rings?

10 A. I do.

11 Q. What is your --

12 MR. CAMMARATA: Objection to the form.

13 BY MS. GOVERNSKI:

14 Q. What is your knowledge of those rings?

15 A. I've seen them.

16 Q. Where did you see them?

17 A. On his fingers.

18 Q. Does he wear them?

19 A. Occasionally.

20 Q. Like how often, what does that mean?

21 A. I don't know.

22 Q. So you've seen him quite a bit over the  
23 years. Is he usually wearing them?

24 A. No, no.

25 Q. Special occasions?

1 A. Special occasions.

2 Q. What has he told you about the Yankees  
3 rings?

4 A. Nothing.

5 Q. When is the last time you saw him wearing  
6 them?

7 A. I'm sorry, I don't recall.

8 Q. Okay. Do you know where they are  
9 physically located?

10 A. Now, no, I don't know.

11 Q. Has he ever talked to you about gifting  
12 them to his son?

13 A. No, we never had that conversation.

14 Q. Okay. So you have no knowledge about  
15 whether he gifted any of his Yankees rings to his son?

16 A. I have no idea.

17 Q. Okay. By the way, you married his son,  
18 right?

19 A. I did.

20 Q. So you are pretty close to Andrew?

21 A. Well, yes, assuming -- close enough that he  
22 asked me to his wedding, yeah.

23 Q. Right. So we talked about the Joe DiMaggio  
24 jersey, we talked about the Yankees rings. Are there any  
25 other sports paraphernalia like that that you recall

1 Mr. Giuliani owning?

2 A. I'm sorry, I don't.

3 Q. Okay. Does Mr. Giuliani have -- strike  
4 that.

5 Monsignor Placa, we talked about  
6 Mr. Giuliani's travels. Do you have any understanding  
7 whether Mr. Giuliani has a passport?

8 A. I don't.

9 Q. Do you have any understanding if  
10 Mr. Giuliani has a will?

11 A. No, I don't.

12 Q. Do you have any understanding of where  
13 Mr. Giuliani keeps any of his valuable documents?

14 A. No, I don't.

15 Q. Do you -- do you -- I saw you looking at  
16 your watch. Do you need a break?

17 A. No. Oh, no, no.

18 Q. Okay.

19 A. Just wondering what time it was.

20 Q. Let me know if you need a break, okay?

21 A. Yeah.

22 Q. By the way, can you receive communications  
23 on your watch?

24 A. I think I can, yeah.

25 Q. But you weren't checking for any

1           communications.

2                   A.     Oh, no.

3                   Q.     Right?

4                             Okay.

5                   A.     Like many people, I was checking for the  
6           time.

7                   Q.     Thank you.

8                             Monsignor Placa, do you know if  
9           Mr. Giuliani changed any of his documents to reflect that  
10          he is a Florida resident?

11                   A.     I don't know.

12                   Q.     No knowledge whatsoever?

13                   A.     No.

14                   Q.     Okay. Do you know if Mr. Giuliani has ever  
15          been called to jury duty here in Florida?

16                   A.     I don't know.

17                   Q.     Do you know if he has any safe depot- --  
18          safety deposit boxes here in Florida?

19                   A.     I don't know.

20                   Q.     Do you know if he has any doctors located  
21          in Florida?

22                   A.     Yes, he has seen -- I don't know who they  
23          are but I know that he has seen doctors here in Florida.

24                   Q.     How do you know that?

25                   A.     Because I was telling him how good a doctor

1 I have. And he told me, "I see someone."

2 Q. And -- and when did you have that  
3 conversation with him?

4 A. I have no idea.

5 Q. Do you know that he in fact started to see  
6 him?

7 A. Started --

8 Q. Oh, I'm sorry, scratch that.  
9 He told you that he was seeing someone?

10 A. That's right.

11 Q. Did he specifically tell you he was seeing  
12 someone in Florida?

13 A. No.

14 Q. So you don't know if the person he was  
15 seeing is located in Florida?

16 A. I don't. I don't.

17 Q. Do you know who Mr. Giuliani's accountant  
18 is?

19 A. No, I don't.

20 Q. So you understand, Monsignor Placa, that  
21 Mr. Giuliani has listed you as a witness in this case,  
22 right?

23 A. I'm sorry, I don't, no.

24 Q. Okay. Well, let's -- let's help you with  
25 that. I'm going to give you Tab 33 which will be Placa

1 Exhibit 1.

2 (Placa Exhibit 1, Defendant's Second Amended  
3 Disclosures, was marked for identification.)

4 MS. GOVERNSKI: And let's also, while we're  
5 doing this, mark as Placa Exhibit 2, Tab 40.

6 (Placa Exhibit 2, Witness List, was marked  
7 for identification.)

8 MS. GOVERNSKI: So this will be marked as  
9 Placa Exhibit 1. And this will be -- oh.

10 BY MS. GOVERNSKI:

11 Q. Can I give you this one so that when I  
12 refer to one, you see what I am referring to? So you are  
13 looking at the official exhibit (handing.)

14 MS. GOVERNSKI: So Placa Exhibit 1 is a  
15 document dated February -- I'm sorry, December 17,  
16 2024, and it is Defendant Giuliani's --

17 MR. CAMMARATA: Thank you.

18 MS. GOVERNSKI: -- Seconded Amended Initial  
19 Disclosures.

20 BY MS. GOVERNSKI:

21 Q. Do you see that title up on the top of the  
22 first page, Monsignor Placa, the Defendant Second --

23 A. I believe --

24 Q. -- Amended Initial Disclosures Pursuant to  
25 Federal Rules of Civil Procedure Rule 26(a)?



1 A. I do.

2 Q. Okay. And let's just quickly look at  
3 what's been marked as Placa Deposition Exhibit 2.

4 And you see that this is titled Defendant  
5 Rudolph W. Giuliani's Pretrial Disclosures Pursuant to  
6 Federal Rule of Civil Procedure 26(a)(3).

7 Do you see that?

8 A. I see it.

9 Q. Okay. Let's start with Placa Deposition  
10 Exhibit 1, if you don't mind.

11 And if you can please look at the bottom of  
12 page 1, you see that it says, "Persons with knowledge,"  
13 right?

14 A. Uh-huh.

15 Q. And it says, "FRCP," which stands for the  
16 Federal Rules of Civil Procedure, 26(a)(i), "the name  
17 and, if known, address and telephone number of each  
18 individual likely to have discoverable information, along  
19 with the subjects of that information, that the  
20 disclosing party may use to support its claims or  
21 defenses, unless the use would be solely for  
22 impeachment."

23 Do you see that?

24 A. I do.

25 Q. Okay. If you could please turn to the next

1 page.

2 And you see your name is listed as the  
3 fifth individual, do you see that?

4 A. Right, I do.

5 Q. And it says, "Monsignor Alan Placa," and  
6 what I presume to be your address?

7 A. Yes.

8 Q. And it says, "is likely to have  
9 discoverable information regarding, but not limited to,  
10 the Rudolph W. Giuliani moving to Florida as his  
11 permanent residence which he actually and does occupy as  
12 his domicile."

13 Do you see that?

14 A. Yes, I don't understand it but I see it.

15 Q. What don't you understand about it?

16 A. The grammar.

17 Q. So what is your understanding of what  
18 discoverable information you may have regarding to  
19 Mr. Giuliani moving to Florida as his permanent residence  
20 which he actually -- and does actually occupy as his  
21 domicile?

22 A. Your question is?

23 Q. What do you understand what discoverable  
24 information regarding those topics that you possess?

25 A. I think I -- we've been discussing it all

1 along. I -- I've visited him here and...

2 Q. Do you have any other information about  
3 these topics that we haven't already discussed today?

4 A. No.

5 Q. We have exhausted all of your knowledge  
6 about those topics?

7 A. Totally exhausted.

8 Q. Totally exhausted.

9 Okay. So let's go to the next Placa  
10 Deposition Exhibit 2.

11 And you will see -- are you with me --

12 A. I am.

13 Q. -- Monsignor Placa? Great.

14 It -- under -- on page 1, it states,  
15 "Witnesses."

16 A. Uh-huh.

17 Q. And it says, "Defendant provides the  
18 following list of potential trial witnesses for this  
19 case-in-chief."

20 Do you see that?

21 A. I do.

22 Q. Okay. If you can turn to the next page.  
23 You see that you are the fourth witness named?

24 A. I do.

25 Q. And you see it says, "Defendant expects to

1 present..." do you see that --

2 A. Uh-huh.

3 Q. -- in the fourth box?

4 A. Right.

5 Q. Do you plan to testify in this case?

6 A. I have no plans of that kind, no.

7 Q. Have you been asked --

8 A. No.

9 Q. -- to testify?

10 When is -- when is the first time you  
11 became aware that Mr. Giuliani was listing you as a  
12 witness?

13 A. When you handed me this document.

14 Q. Prior to this point, you had no  
15 understanding --

16 A. No.

17 Q. -- that you would be asked to testify?

18 A. Other than this -- this deposition, no.

19 Q. Okay. And have you ever had any  
20 conversations with Mr. Giuliani regarding this  
21 deposition?

22 A. Oh, no.

23 MR. CAMMARATA: Objection, asked and  
24 answered.

25

1 BY MS. GOVERNSKI:

2 Q. Have you had any conversations with  
3 Mr. Giuliani about testifying at a trial?

4 A. No.

5 Q. Do you have any idea what trial this  
6 document refers to?

7 A. I don't.

8 Q. Do you have any idea what the topics of the  
9 upcoming trial is about?

10 A. No.

11 Q. If you look at topics of testimony on  
12 page 2, it's the fifth box. Do you see where I am,  
13 "Topics of Testimony" the fifth column --

14 A. Uh-huh.

15 Q. -- in this chart on page 2?

16 A. Yes.

17 Q. And I'm looking at the -- your row where  
18 your name is listed and it says, "Discussions of Rudolph  
19 W. Giuliani's relocation from his New York City  
20 cooperative apartment to his Palm Beach County, Florida  
21 condominium as his homestead property prior to  
22 December 31, 2023."

23 Do you see that?

24 A. I see it.

25 Q. And is there anything about this topic that

1 we have not discussed?

2 A. No.

3 Q. Have we exhausted your recollection  
4 regarding this topic?

5 A. Completely.

6 Q. And does seeing the topics of the testimony  
7 change or alter your testimony that you provided today in  
8 any way?

9 A. No.

10 Q. Okay. Mr. Mon- -- I'm sorry, Monsignor  
11 Placa.

12 A. The pope would appreciate that. I don't  
13 care.

14 Q. It's a mouthful but I'm happy to respect  
15 it.

16 You understand that you are here today  
17 pursuant to a subpoena?

18 A. Yes.

19 Q. You actually brought some documents with  
20 you today?

21 A. I did.

22 Q. What documents did you bring with you? Can  
23 you describe what -- what you brought?

24 A. Why don't we give those back to you so we  
25 don't mess them up.

1                   These documents were served on me at my  
2 front door. I was in pajamas, it was at 7 o'clock in the  
3 morning. That's what they are.

4                   Q.     And I see that you took some notes.

5                   A.     No. No. That was the process server.

6                   Q.     Process server.

7                   Okay. We're going to hand you a clean  
8 copy, if you don't mind.

9                   A.     Uh-huh.

10                  Q.     Have you taken any notes on those copies --

11                  A.     No.

12                  Q.     -- that you have?

13                  A.     No.

14                  Q.     Okay.

15                  MS. GOVERNSKI: We're going to mark Tab 34.

16                                 (Placa Exhibit 3, Plaintiffs' Notice of  
17 Deposition of Monsignor Alan Placa, was marked for  
18 identification.)

19 BY MS. GOVERNSKI:

20                  Q.     This will be marked Placa Deposition  
21 Exhibit 3 --

22                  A.     Uh-huh.

23                  Q.     -- which is the document titled Plaintiffs'  
24 Notice of Deposition of Monsignor Alan Placa.

25                                 Do you see that, sir?

1 A. I do.

2 Q. And is this the deposition subpoena that  
3 you received and that -- a copy of which you brought here  
4 today?

5 A. I mean, until I read it, I can't answer  
6 that.

7 Q. Take a moment, look at it, and just let me  
8 know. I just want to make sure it is the same.

9 A. (Complies.)  
10 This is the document in which I was served.

11 Q. Okay. Thank you for checking.

12 This document, which has been marked as  
13 Placa Deposition Exhibit 3 --

14 A. Three.

15 Q. -- if I could please direct your attention  
16 to page 6 where it says "Documents to be Produced."

17 Do you see that?

18 A. Yes.

19 Q. Do you understand that this deposition  
20 subpoena requested that you produce a number of  
21 documents, types-- categories of documents?

22 A. Uh-huh.

23 Q. Have you produced any documents in  
24 response --

25 A. No, I don't have any documents to produce,



1 but no, I have not produced any.

2 Q. Well, you testified earlier that you have  
3 calendar entries relating to Mr. Giuliani's presence in  
4 Palm Beach, right?

5 A. I would make a note in my calendar that I  
6 was going to visit him, yeah.

7 Q. Okay. If I can direct your attention to  
8 Document Request 2, which asks for all documents and  
9 communications relating to Defendant Giuliani's travel  
10 between July 1st, 2023, and August 8, 2023.

11 A. '24.

12 Q. I'm sorry. Thank you. 2024. You see that  
13 that's what Document Request Number 2 requests?

14 A. Yes.

15 Q. Okay. So -- and your calendar entries  
16 regarding his presence in Palm Beach County, would you  
17 interpret Request Number 2, that those documents would be  
18 responsive to it?

19 A. I'm sorry, please repeat that.

20 Q. Yes, thank you. That was a poorly worded  
21 question.

22 Do you understand that your calendar  
23 entries regarding Mr. Giuliani's travel to Palm Beach  
24 during 2023 and 2024 would be responsive to document  
25 Request Number 2?

1           A.     Yes, if they are here. I mean, I haven't  
2 looked through my calendar but...

3           Q.     So to the extent you have documents  
4 reflecting Mr. Giuliani's travel between these dates, you  
5 would understand that those would have to be produced  
6 pursuant?

7           A.     Sure.

8           Q.     So after this deposition, would you look  
9 and produce those documents?

10          A.     I'd be happy to.

11          Q.     Okay. What efforts have you taken to look  
12 through the remainder of the requests to see if you have  
13 any responsive documents?

14          A.     I haven't.

15          Q.     You haven't?

16          A.     No, I haven't.

17          Q.     What efforts, if any, have you taken to  
18 understand if you have any documents responsive to this  
19 documents request?

20          A.     Again, I read through them quickly  
21 and didn't feel that I had anything that was responsive  
22 at all.

23          Q.     And so you didn't produce documents based  
24 on feeling like you didn't have any documents?

25          A.     No.

1 Q. But not based on having actually searched?

2 A. I didn't search, no.

3 Q. Okay. If you can, please, just turn back  
4 to page 1 of this document -- I'm sorry, page 3, the  
5 first page of the subpoena where it says "Subpoena to  
6 Testify at a Deposition." Do you see that?

7 A. Uh-huh.

8 Q. And you see there is a box checked that  
9 states "production." Do you see that?

10 A. I do.

11 Q. And it says, "You or your representatives  
12 must also bring with you to the deposition the following  
13 documents. Electronically stored information or objects,  
14 and must permit inspection, copying, testing, or sampling  
15 of the material to pull in certified response to all  
16 discovery requests in attached Schedule A served on or  
17 before two days prior to the day of the deposition."

18 Do you see that?

19 A. I see it. I don't understand it but I see  
20 it.

21 Q. But you understand that this stated that  
22 you were to -- that you must bring the responsive  
23 documents to the deposition today?

24 A. I understand that.

25 Q. Did you do that?

1 A. In here, I did. But not in here, I didn't.

2 Q. But you have not given us any of those  
3 documents, right?

4 A. Right. I'm happy to do that but I have not  
5 done it.

6 Q. Okay. I am at -- we've been going about an  
7 hour. I have about an hour left. Do you want to take a  
8 break or do you want to keep going?

9 A. I want to go home.

10 Q. I'm sorry. I just have about an hour left,  
11 but I'm happy to give you a break if you want one.

12 A. No, I'm okay.

13 Q. Okay. Let's keep going.

14 Okay. I'm going to hand you --

15 MS. GOVERNSKI: Does anyone else need a  
16 break?

17 THE VIDEOGRAPHER: I was just going to say  
18 Veritext has a 90-minute media unit. So at 90  
19 minutes we're going to have to do a hard stop.

20 MS. GOVERNSKI: Oh, so let's take a break  
21 now then, and then we'll come back. Okay. Take  
22 just a five-minute break, if that's okay?

23 THE VIDEOGRAPHER: Going off the video  
24 record. The time is 5:08 p.m.

25 (A recess is taken.)

1 THE VIDEOGRAPHER: Coming back on the video  
2 record. The time is 5:17 p.m.

3 BY MS. GOVERNSKI:

4 Q. Monsignor Placa, have you spoken with  
5 anyone about your testimony during the break?

6 A. No.

7 Q. Anything about your previous testimony that  
8 you want to change or correct?

9 A. I wish I could remember anything I say. So  
10 no, I don't want to change.

11 Q. But there is no reason --

12 A. No.

13 Q. -- that you shouldn't remember what you  
14 said, right?

15 A. No.

16 Q. Okay. I'm handing you what is being marked  
17 as Placa Deposition Exhibit 4.

18 (Placa Exhibit 4, LinkedIn Profile, was  
19 marked for identification.)

20 BY MS. GOVERNSKI:

21 Q. Which is a copy of your LinkedIn resume.  
22 Do you see this?

23 A. I do.

24 Q. Is this document Placa Exhibit 4 accurate?

25 A. Yes, it is.

1 Q. Okay. And under Experience, it lists your  
2 role as senior vice president with Giuliani Partners; is  
3 that right?

4 A. That's correct.

5 Q. What do you do as a senior vice president?

6 A. Nothing.

7 Q. I'm sorry?

8 A. Nothing.

9 Q. Do you -- is that still your title?

10 A. It may be, but, I mean, I haven't used the  
11 title in a long time.

12 Q. Are you still employed by Giuliani  
13 Partners?

14 A. Can you define employed?

15 Q. Why don't you tell me. It's listed on your  
16 LinkedIn profile, right, as experience, August 2022 to  
17 present, right?

18 A. Right.

19 Q. Is that accurate?

20 A. I believe so. I mean, it never had any  
21 responsibility. I didn't do anything.

22 Q. Did you ever do anything for Giuliani  
23 Partners?

24 A. No.

25 Q. Were you paid by Giuliani Partners?

1 A. No.

2 Q. You never received a paycheck from Giuliani  
3 Partners?

4 A. No.

5 Q. So why were you listed as employed by  
6 Giuliani Partners?

7 A. I don't know.

8 Q. Has Mr. Giuliani ever provided you with any  
9 financial assets?

10 A. No.

11 Q. Has Mr. Giuliani ever paid you in any way?

12 A. Never.

13 Q. Has Giuliani Partners ever paid you in any  
14 way?

15 A. No.

16 Q. So is this accurate that you are a senior  
17 vice president of Giuliani Partners?

18 A. I certainly was given that title, yes.

19 Q. Why were you given that title?

20 A. I don't know.

21 Q. Who gave you that title?

22 A. Rudy, I assume.

23 Q. This is -- this is your LinkedIn profile,  
24 right?

25 A. Could be. I mean, I don't know that except

1 that it is written there, yeah.

2 Q. Do you have a LinkedIn profile?

3 A. I don't know.

4 Q. Is there any reason for you to believe that  
5 the Alan Placa who is listed as senior vice president  
6 Giuliani Partners at a LinkedIn profile is not you?

7 A. No.

8 Q. Is there any reason to believe that this is  
9 not your LinkedIn profile?

10 A. No.

11 Q. Is it your testimony that you have never  
12 been employed by Giuliani Partners?

13 A. Again, if you define employed for me, it  
14 would help.

15 Q. Well, that's fair. What has your  
16 relationship historically been with Giuliani Partners?

17 A. I don't -- I don't believe I ever had any  
18 specific actual relationship. I wasn't employed to do  
19 any particular work for them, but I was given this title.

20 Q. You were given the title with no  
21 responsibilities?

22 A. That's right.

23 Q. And no paycheck?

24 A. And no paycheck.

25 Q. Why did you want a title?



1 A. I didn't want a title.

2 Q. Mr. -- was it -- whose idea was it to give  
3 you a title?

4 A. I have no idea.

5 Q. Who owns Giuliani Partners?

6 A. Rudy does.

7 Q. Is he the only owner?

8 A. As far as I know, but I...

9 Q. If he didn't want you to have a title,  
10 would he be able -- let me strike that. Let me reword  
11 it.

12 If Mr. -- if Mr. Giuliani -- strike that.  
13 Would you -- do you believe that Mr.  
14 Giuliani would have to approve you having a title of  
15 senior vice president of Giuliani Partners?

16 MR. CAMMARATA: Objection to the form.

17 THE WITNESS: I believe so.

18 BY MS. GOVERNSKI:

19 Q. Does Giuliani Partners have a physical  
20 office in Palm Beach?

21 A. It does not.

22 Q. Does it have a physical office in New York?

23 A. At one time we had space in an apart- -- in  
24 an office building in New York.

25 Q. And when was that?

1           A.     Oh, years ago and I'm sorry, I can't be  
2 more specific but...

3           Q.     And Giuliani Partners no longer has space  
4 in New York?

5           A.     No.

6           Q.     Does it have office space anywhere?

7           A.     No.

8           Q.     When did that end?

9           A.     I have no idea.

10          Q.     When Giuliani Partners had office space in  
11 New York, did you go into it?

12          A.     Once or twice.

13          Q.     And what did do you when you went into it?

14          A.     Sat down, had a conversation and left.

15          Q.     Okay. So you didn't perform any work --

16          A.     No.

17          Q.     -- when you went into the office?

18          A.     No.

19          Q.     Do you understand that Mr. Giuliani -- oh,  
20 I'm sorry, scratch that.

21                   Monsignor Placa, did you have access to any  
22 corporate accounts of Giuliani Partners?

23          A.     No.

24          Q.     Do you have any personal knowledge about  
25 any of the financial practices of Giuliani Partners?

1 A. No.

2 Q. Do you know -- have any idea of how many  
3 employees Giuliani Partners currently has?

4 A. I have no idea.

5 Q. Do you have any knowledge whether Giuliani  
6 Partners is currently in a -- functioning entity?

7 A. No, I don't.

8 Q. Are you aware that Mr. Giuliani owns other  
9 companies?

10 A. I believe I -- I believe he does, yeah.

11 Q. Do you have any personal knowledge of what  
12 other companies --

13 A. No, I don't.

14 Q. -- he owns?

15 A. No, I don't.

16 Q. Do you know if any of Mr. Giuliani's other  
17 companies have office space in Florida?

18 A. No, I don't.

19 Q. Do you have any personal knowledge of  
20 whether any of Mr. Giuliani's entities have employees in  
21 Florida?

22 A. No, I don't.

23 Q. Do you have any personal knowledge of  
24 whether any of Mr. Giuliani's other entities are  
25 incorporated in Florida?

1 A. No, no, I don't.

2 Q. Do you have any personal knowledge of  
3 whether Mr. Giuliani has filed taxes for any of his other  
4 entities in Florida?

5 A. I don't.

6 Q. Have you ever heard of the corporate entity  
7 Giuliani Communications?

8 A. No.

9 Q. Are you an employee of Giuliani  
10 Communications?

11 A. No.

12 Q. Have you ever heard of an entity called  
13 Standard USA?

14 A. Standard USA? No.

15 Q. Are you an employee of Standard USA?

16 A. No.

17 Q. Has any of Mr. Giuliani's corporate  
18 entities ever transferred any items of value to you  
19 personally?

20 A. No.

21 Q. Have you ever received a paycheck from any  
22 of the Giuliani entities?

23 A. Never.

24 Q. Have you ever received compensation of any  
25 kind from any of Mr. Giuliani's entities?

1 A. No.

2 Q. Okay. I'm going to hand you what has been  
3 marked as Placa Deposition Exhibit 5.

4 (Placa Exhibit 5, BishopAccountability.org  
5 Article, was marked for identification.)

6 BY MS. GOVERNSKI:

7 Q. And I am going to go through this very  
8 quickly, Monsignor Placa.

9 Do you see the document --

10 A. I do.

11 Q. -- in front of you?

12 A. I do.

13 Q. And it has the title Giuliani Firm Confirms  
14 It Hired L.I. Priest Barred from Ministry.

15 A. Yes.

16 Q. Do you see that?

17 A. I do.

18 Q. And the first paragraph states that, "A  
19 prominent Long Island priest, who was barred from the  
20 ministry last year after an allegation of sexual abuse,  
21 has been quietly working for the consulting business of  
22 Rudolph W. Giuliani, a Giuliani spokeswoman confirmed  
23 yesterday."

24 The next sentence says, "The priest,  
25 Monsignor Alan J. Placa, is one of the former mayor's

1 oldest friends. He's been coming into the Manhattan  
2 office of the firm Giuliani Partners about three days a  
3 week."

4 Do you see those paragraphs?

5 A. I do.

6 Q. Are anything about those sentences  
7 inaccurate?

8 A. Yeah, I think that's an overstatement of  
9 how often I went into that office, yeah.

10 Q. And -- and an overstatement because you did  
11 not go into that office three days a week?

12 A. That's right.

13 Q. How often did you go into that office?

14 A. I have no recollection. Very rarely.

15 Q. Any other parts of those couple sentences I  
16 wrote -- I read inaccurate?

17 A. "Incredibly learned," that's accurate.

18 Q. I'm sorry, just of the two sentences that  
19 I, that I read?

20 A. Oh, no, no.

21 Q. Nothing in the sentences I read are  
22 inaccurate?

23 A. No.

24 Q. And it references that you are one of the  
25 former mayor's oldest friends; is that right?

1 A. That's correct.

2 Q. You talked about that you met in 9th grade?

3 A. 9th grade.

4 Q. How would you characterize your  
5 relationship with Mr. Giuliani?

6 A. Lifelong friends.

7 Q. Has Mr. Giuliani been there for you during  
8 the seminole moments of your life?

9 A. Sure.

10 Q. And you his?

11 A. I'm sorry.

12 Q. And you his?

13 A. Yes, indeed.

14 Q. What are some of those seminole moments  
15 that you've been there for each other?

16 A. I can't recall specific- -- specifically,  
17 I'm sorry.

18 Q. So you went to high school together; is  
19 that right?

20 A. Went to high school and college together.

21 Q. You went on dates growing up together?

22 A. Sure.

23 Q. And you were both members of the same  
24 fraternity; is that right?

25 A. Phi Rho Pi.

1 Q. Mm-hmm. Phi Rho Pi?

2 A. Phi Rho Pi.

3 Q. Okay.

4 And you -- you officiated the funeral of  
5 his retire- -- deceased mother; is that right?

6 A. Yes.

7 Q. And his deceased father?

8 A. Yes.

9 Q. And you presided over Mr. Giuliani's  
10 various weddings, right, too, as well, right?

11 A. No, no.

12 Q. I'm sorry. Let me -- let me start that  
13 over.

14 A. Yeah.

15 Q. You were his best man at his first wedding?

16 A. That's correct.

17 Q. All right. And then you presided over his  
18 second wedding?

19 A. That's correct.

20 Q. And -- and then Mr. Giuliani and his second  
21 wife had two children, right?

22 A. Uh-huh.

23 Q. And you presided over their baptisms?

24 A. Right.

25 Q. And we already discussed that you



1 officiated Andrew's wedding?

2 A. Right.

3 Q. Did you officiate Mr. Giuliani's wedding to  
4 his ex-wife, Judith?

5 A. No.

6 Q. You went on trips with them, though, right,  
7 Judith and Mr. Giuliani?

8 A. No.

9 Q. Did you go to Rome in 2013 with them?

10 A. Oh, I'm sorry. Yes. Yeah.

11 Q. Can you tell me about that?

12 A. No, I don't remember anything about it at  
13 all, as a matter of fact, until you reminded me.

14 Q. As Mr. Giuliani was married throughout the  
15 years, can you describe a little bit about what your  
16 relationship with Mr. Giuliani was like during those  
17 years?

18 A. No. I only the -- the question is a bit  
19 vague for me to...

20 Q. Sure.

21 Did you maintain your closeness to --

22 A. Oh.

23 Q. -- Mr. Giuliani throughout his --

24 A. I mean, absolutely. Absolutely.

25 Q. And how so?

1 A. By seeing him from time to time.

2 Q. Would you describe Mr. Giuliani as your  
3 best friend?

4 A. Certainly my oldest, yeah.

5 Q. Amongst your best friends?

6 A. Yes, amongst my best friends.

7 Q. If you can look at the second to last  
8 para- -- paragraph of that article which is Placa  
9 Deposition Exhibit 5.

10 A. Uh-huh.

11 Q. It says, "The former mayor has also spoken  
12 out strongly in defense of his friend who joined Giuliani  
13 Partners in August."

14 Do you see that?

15 A. No, I don't.

16 Q. Let me make sure that I'm looking at the  
17 right place.

18 Ah, okay. Second to the last paragraph,  
19 you see that starts with "Monsignor Placa" at that .58?

20 A. 58, right. Uh-huh.

21 Q. You see that?

22 You see the last sentence here says, "The  
23 former mayor has also spoken out strongly in defense of  
24 his friend"?

25 A. Right.

1 Q. Is that true, that Mr. Giuliani --

2 A. Yes. Yes, he's been very strong in my  
3 defense, right.

4 Q. And what has that meant to you?

5 A. Well, I mean, it meant a lot.

6 Q. And he stood by you notwithstanding that it  
7 has come at consequence to himself, right?

8 A. That's right.

9 Q. What kind of consequences?

10 A. I have no idea.

11 Q. Okay. I want to hand you what I'll mark as  
12 Placa Deposition Exhibit 6.

13 (Placa Exhibit 6, ABC News Article 10/23/07,  
14 was marked for identification.)

15 THE WITNESS: Thank you.

16 BY MS. GOVERNSKI:

17 Q. Monsignor Placa, Placa Deposition Exhibit 6  
18 is an ABC News article titled Giuliani Defends, Employs  
19 Priest Accused of Molesting Teens.

20 A. Right.

21 Q. Do you see that?

22 A. I do.

23 Q. And this is from October 23, 2007, right?

24 A. Uh-huh.

25 Q. And at that point, was Mr. Giuliani running

1 for president?

2 A. I can't recall that.

3 Q. Okay. And if we look at the second  
4 paragraph, it says, "The priest, Monsignor Alan Placa, a  
5 long-time friend of Giuliani and the priest who  
6 officiated at his second wedding to Donna Hanover,  
7 continues to work at Giuliani Partners in New York, to  
8 the outrage of some of his accusers and victims groups  
9 which have begun to protest at Giuliani campaign events."

10 Do you see that?

11 A. I do.

12 Q. Do you recall protests at Giuliani campaign  
13 events?

14 A. No. No, I don't.

15 Q. Do you have any reason to dispute that  
16 there were --

17 A. No.

18 Q. Okay. And let me just ask that question in  
19 full. Do you have any reason to dispute that there were  
20 protests at Giuliani campaign events in connection with  
21 his support of you?

22 A. I can't dispute it. I don't know.

23 Q. Okay. And when this says that you  
24 continued to work at Giuliani Partners in New York, is  
25 that accurate?

1           A.     Well, continued in the same way I had  
2 always worked which was really just as a friend.

3           Q.     I'm trying to understand. If Mr. Giuliani  
4 was receiving outrage relating to his reported employment  
5 of you, why he would continue to give you a title of  
6 employment when you didn't actually work for him.

7                     Have you reconciled that at all?

8           A.     No.

9           MR. CAMMARATA: I'm going to object to the  
10 form.

11           THE WITNESS: No. Again, I never -- I  
12 never received a paycheck. I never worked for him  
13 in that sense. He's just been a supportive friend  
14 throughout.

15 BY MS. GOVERNSKI:

16           Q.     Would you describe him as a loyal person?

17           A.     Loyal? Yes, very.

18           Q.     Is loyalty very important to him?

19           A.     Yes.

20           Q.     Can you describe that?

21           A.     Loyalty? No, I can't describe it --

22           Q.     I'm sorry.

23           A.     How important is it to him, I think it's  
24 very important. You know, a man who is as public as he  
25 is has a lot of people around him all the time. And he

1 can never be sure which of them are there for him and for  
2 themselves. So to know that he has some friends who are  
3 there just for him, I think that means a lot.

4 Q. And so do you feel loyal to him as well?

5 A. Oh, yes.

6 Q. Indebted to him?

7 A. Indebted? I'm always indebted to the  
8 people who take such time and care for me, yes, of  
9 course.

10 Q. The only reason I can understand him giving  
11 you a title, notwithstanding you not actually performing  
12 services for him, is out of loyalty to you.

13 Is there any other reason?

14 MR. CAMMARATA: I'm going to object. Is  
15 there a question or is that a statement?

16 BY MS. GOVERNSKI:

17 Q. Is there any other reason?

18 A. No.

19 MR. CAMMARATA: Can you just repeat the  
20 question? Was there a question?

21 MS. GOVERNSKI: He answered the question.

22 MR. CAMMARATA: That wasn't a question.

23 MS. GOVERNSKI: You can have realtime if  
24 you want it.

25 MR. CAMMARATA: Okay. That was not a

1 question.

2 BY MS. GOVERNSKI:

3 Q. Okay. I'm going to hand you what has been  
4 marked as Placa Deposition Exhibit 7 and 8.

5 (Placa Exhibit 7, Federal Election  
6 Commission Individual Contributions was marked for  
7 identification.)

8 (Placa Exhibit 8, Federal Election  
9 Commission Individual Contributions was marked for  
10 identification.)

11 BY MS. GOVERNSKI:

12 Q. Monsignor Placa, I'm handing you two  
13 documents from the Federal Election Commission that you  
14 can see have been filtered to reflect contributions from  
15 Alan Placa. Do you see that?

16 A. I do.

17 Q. Do you believe that the Alan Placa referred  
18 to here is you?

19 A. I have no idea.

20 Q. Okay. Well, let's start with Placa  
21 Deposition Exhibit 8 which reflects individual  
22 contributions. If we go to the very last page, eight out  
23 of eight, it begins 9/21/2006. I'll let you get there.

24 Are you there?

25 A. 9/21/2006, no. Oh, 9/20/2016. No?

1 Q. 9/21/20- -- the last page.

2 A. Aha. Gotcha.

3 Q. Are you there?

4 A. I am.

5 Q. Do you see the line 9/21/2006?

6 A. Right.

7 Q. Okay. And you see that it says -- the  
8 first line, Contributor Name, says Placa, Alan J. Mr. Do  
9 you see that?

10 A. Uh-huh.

11 Q. And it's a contribution to the Republican  
12 National Committee. Do you see that?

13 A. Uh-huh.

14 Q. And it says Employer Giuliani Partners,  
15 LLC. Do you see that?

16 A. Yep.

17 Q. Any reason to believe that this does not  
18 describe you?

19 A. No, it's me.

20 Q. Okay. And so any reason to believe that  
21 these records don't reflect your various contributions  
22 over the years?

23 A. No. Again, I haven't looked through them  
24 carefully, but I wouldn't dispute it without further  
25 examination.



1 Q. Okay. And if we can continue on this last  
2 page of Placa Deposition Exhibit 8 --

3 A. Uh-huh.

4 Q. -- you'll see there is one, two, three,  
5 four, five entries on this one page. Do you see that?

6 A. Uh-huh.

7 Q. Four of these contributions are to Rudy  
8 Giuliani, Presidential Committee, Inc., right?

9 A. Right.

10 Q. And these are from 2007?

11 A. Uh-huh.

12 Q. Okay. So does that refresh your  
13 recollection regarding whether Mr. Giuliani was running  
14 for president in 2007?

15 A. It doesn't refresh my memory, no.

16 Q. Okay. Did you contribute to Mr. Giuliani's  
17 presidential committee in 2007?

18 A. Based on this document, I'd say yes,  
19 although I don't have any particular recollection of it.

20 Q. Okay. And you've made various  
21 contributions throughout the years to political  
22 candidates, right?

23 A. I have.

24 Q. Have you ever donated to any democratic  
25 candidates?

1 A. I really don't -- I don't know. I'm sorry.

2 Q. Would it surprise you if every individual  
3 or campaign that you've donated to aligns with the GOP?

4 A. No, it wouldn't surprise me but I don't  
5 remember that. But it wouldn't surprise me.

6 Q. Mr. Placa, did you vote in this last  
7 presidential election?

8 A. I don't think so, no.

9 Q. Okay. Mr. Placa -- I'm sorry, Monsignor  
10 Placa, do you believe that the 2020 election was stolen?

11 MR. CAMMARATA: Objection.

12 THE WITNESS: No.

13 BY MS. GOVERNSKI:

14 Q. I'm sorry, did you answer the question?

15 A. I did. No.

16 Q. Are you aware of Mr. Giuliani's statements  
17 regarding our clients Shaye Moss and Ruby Freeman?

18 A. No.

19 Q. You have no recollection of it?

20 A. I don't.

21 Q. Okay.

22 MS. GOVERNSKI: At that point, I will pause  
23 the deposition. I want to consult with my  
24 colleagues, go off the record, and then  
25 potentially we'll be finished. We can go off the

1 record for five minutes.

2 THE VIDEOGRAPHER: Going off the video  
3 record. The time is 5:36 p.m.

4 (A recess is taken.)

5 THE VIDEOGRAPHER: Coming back on the video  
6 record. The time is 5:38 p.m.

7 BY MS. GOVERNSKI:

8 Q. Monsignor Placa, did you have any  
9 conversations about your testimony with anyone during the  
10 break?

11 A. No.

12 Q. Is there any aspect of your testimony that  
13 you would like to change as you sit here today?

14 A. No.

15 Q. Is there anything else that you have not  
16 shared today regarding the topics that we've discussed?

17 A. No.

18 MS. GOVERNSKI: I have no further  
19 questions.

20 MR. CAMMARATA: Thank you.

21 THE WITNESS: God is good.

22 THE VIDEOGRAPHER: Would either party like  
23 a copy of the video?

24 MS. GOVERNSKI: We would like the video and  
25 the transcript.

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MR. CAMMARATA: I'll get the transcript.

THE VIDEOGRAPHER: This concludes the deposition of Alan Placa. Going off the video record. The time is 5:39 p.m.

(The proceeding is adjourned at 5:39 p.m.)

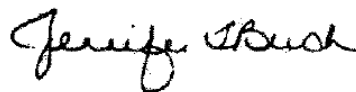
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CERTIFICATE OF OATH OF WITNESS

STATE OF FLORIDA )  
COUNTY OF ST. LUCIE )

I, the undersigned Notary Public, in and for the State of Florida, hereby certify that MONSIGNOR ALAN PLACA personally appeared before me, produced ID and was duly sworn.

WITNESS MY HAND and official seal in the City of Fort Pierce, County of St. Lucie, State of Florida this December 30, 2024.



Jennifer L. Bush, RPR, FPR, FPR-C  
Notary Public  
State of Florida at Large.  
My Commission: #HH 529563  
My commission expires: 9/20/28

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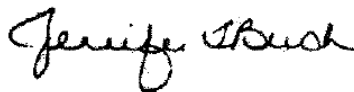
CERTIFICATE OF REPORTER

STATE OF FLORIDA )  
COUNTY OF ST. LUCIE )

I, Jennifer L. Bush, Registered Professional Reporter, Florida Professional Reporter, do hereby certify that I was authorized to and did stenographically report the deposition of MONSIGNOR ALAN PLACA; and that a review of the transcript was requested; and that pages 1 through 96, inclusive, are a true record of my stenographic notes.

I further certify that I am not a relative, employee, attorney or counsel of any of the parties, nor am I a relative or employee of any of the parties, attorneys or counsel connected with the action, nor am I financially interested in the action.

Dated this December 30, 2024.



Jennifer Bush, RPR, FPR, FPR-C

The foregoing certification of the transcript does not apply to any reproduction of the same by and means unless under the direct control and/or direction of the certifying reporter.

1 Joseph M. Cammarata, Esq.

2 Joe@cdlawpc.com

3 December 30, 2024

4 RE: Freeman, Ruby, Et Al. v. Giuliani, Rudolph W.  
5 12/26/2024, Alan Placa (#7087703)

6 The above-referenced transcript is available for  
7 review.

8 Within the applicable timeframe, the witness should  
9 read the testimony to verify its accuracy. If there are  
10 any changes, the witness should note those with the  
11 reason, on the attached Errata Sheet.

12 The witness should sign the Acknowledgment of  
13 Deponent and Errata and return to the deposing attorney.  
14 Copies should be sent to all counsel, and to Veritext at  
15 cs-ny@veritext.com

16 Return completed errata within 30 days from  
17 receipt of testimony.

18 If the witness fails to do so within the time  
19 allotted, the transcript may be used as if signed.

20  
21  
22 Yours,

23 Veritext Legal Solutions  
24  
25

1 Freeman, Ruby, Et Al. v. Giuliani, Rudolph W.

2 Alan Placa (#7087703)

3 E R R A T A S H E E T

4 PAGE \_\_\_\_\_ LINE \_\_\_\_\_ CHANGE \_\_\_\_\_

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6 REASON \_\_\_\_\_

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24 Alan Placa

Date

25



1 Freeman, Ruby, Et Al. v. Giuliani, Rudolph W.

2 Alan Placa (#7087703)

3 ACKNOWLEDGEMENT OF DEPONENT

4 I, Alan Placa, do hereby declare that I  
5 have read the foregoing transcript, I have made any  
6 corrections, additions, or changes I deemed necessary as  
7 noted above to be appended hereto, and that the same is  
8 a true, correct and complete transcript of the testimony  
9 given by me.

10

11

\_\_\_\_\_

12

Alan Placa

Date

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\*If notary is required

14

SUBSCRIBED AND SWORN TO BEFORE ME THIS

15

\_\_\_\_\_ DAY OF \_\_\_\_\_, 20\_\_.

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NOTARY PUBLIC

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[& - 718-447-0020]

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[76 - approve]

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Federal Rules of Civil Procedure

Rule 30

(e) Review By the Witness; Changes.

(1) Review; Statement of Changes. On request by the deponent or a party before the deposition is completed, the deponent must be allowed 30 days after being notified by the officer that the transcript or recording is available in which:

(A) to review the transcript or recording; and

(B) if there are changes in form or substance, to sign a statement listing the changes and the reasons for making them.

(2) Changes Indicated in the Officer's Certificate.

The officer must note in the certificate prescribed by Rule 30(f)(1) whether a review was requested and, if so, must attach any changes the deponent makes during the 30-day period.

DISCLAIMER: THE FOREGOING FEDERAL PROCEDURE RULES ARE PROVIDED FOR INFORMATIONAL PURPOSES ONLY.

THE ABOVE RULES ARE CURRENT AS OF APRIL 1, 2019. PLEASE REFER TO THE APPLICABLE FEDERAL RULES OF CIVIL PROCEDURE FOR UP-TO-DATE INFORMATION.

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COMPANY CERTIFICATE AND DISCLOSURE STATEMENT

Veritext Legal Solutions represents that the foregoing transcript is a true, correct and complete transcript of the colloquies, questions and answers as submitted by the court reporter. Veritext Legal Solutions further represents that the attached exhibits, if any, are true, correct and complete documents as submitted by the court reporter and/or attorneys in relation to this deposition and that the documents were processed in accordance with our litigation support and production standards.

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