

VOLUME 1
DEPOSITION OF MICHAEL MILLER
November 3, 2009

125

5 Q. Have you ever assisted a basketball player in
6 falsely claiming that they were a California resident to
7 qualify for in-state tuition?

11 THE WITNESS: I think I'll take the right of
12 the Fifth Amendment on that.

127

7 Q. Isn't it true for years you committed fraud
8 against the taxpayer by misclassifying students as
9 in-state California residents?

13 THE WITNESS: I'll take the Fifth.

15 Q. Isn't it true that you also engaged in rampant
16 academic fraud at LACC to benefit your basketball
17 players?

20 THE WITNESS: I'll take the Fifth Amendment.

22 Q. Isn't it true your basketball players were not
23 required to attend class at LACC?

128

1 THE WITNESS: I'll take the Fifth Amendment.

3 Q. Isn't it true that you also assisted your
4 players in committing work-study fraud at LACC?

5 A. I'll take the Fifth Amendment.

13 Q. Isn't it true that you had a number of
14 professors who would give your basketball players grades
15 when they did not attend classes or take tests?

17 THE WITNESS: I'll take the Fifth Amendment.

129

5 Q. How long have you been committing fraud at
6 LACC?

7 A. I'll take the Fifth Amendment.

11 Q. Isn't it true that [name redacted] allowed you to
12 add -- have basketball players add classes well after
13 the deadline to do so?

14 A. I'll take the Fifth Amendment.

15 Q. Isn't it true that's why [name redacted] -- that
16 he rewarded instructors who would cheat the system by
17 giving your kids grades, when they never came to class,
18 and with money in the form of assistant coaching
19 positions?

23 THE WITNESS: I'll take the Fifth Amendment.

25 Q. We've covered academic fraud, tuition fraud,

130

1 grade fraud, work-study fraud. Isn't it also true that
2 you caused your players to falsely claim they were
3 military residents to steal tuition that's owed to the
4 District?

7 THE WITNESS: I'll take the Fifth Amendment.

9 Q. Isn't it true that you also personally
10 embezzled funds from the athletic department at LACC?

13 THE WITNESS: I'll take the Fifth Amendment.

131

1 Q. Do you have any knowledge of a criminal
2 investigation into your conduct?

3 A. I will take the Fifth Amendment.

VOLUME 2
DEPOSITION OF MICHAEL MILLER
February 11, 2010

256

11 Q. Have you received a target letter from a
12 prosecuting authority, stating that you are the target
13 of a criminal investigation?

257

7 THE WITNESS: I'll take the Fifth Amendment.

265

19 Q: Why are you destroying evidence in
20 this lawsuit?

266

1 THE WITNESS: I assert my Fifth Amendment
2 rights.

**VOLUME 3
DEPOSITION OF MICHAEL MILLER
March 16, 2010**

368

21 Q. Did you ever mishandle financial aid checks
22 for your basketball players?

369

5 THE WITNESS: I'll invoke the Fifth Amendment.

377

5 Q. Did you commingle in
6 the same account money from your outside business with
7 funds for LACC?

18 THE WITNESS: I'll follow advice of counsel
19 and take the Fifth Amendment.

397

1 Q. Why did you tell players to falsely classify
2 themselves as military residents?

8 THE WITNESS: I'm invoking the Fifth
9 Amendment.

24 Q. How long have you been committing fraud at
25 LACC?

398

7 THE WITNESS: I'm invoking the Fifth
8 Amendment.

449

3 Q. Paragraph 40. Did you ever give a player cash
4 to get his car from a tow yard

14 THE WITNESS: I will follow advice of counsel
15 and take the Fifth.

17 Q. How about, have you ever bought a player an
18 airline ticket, basketball player?

25 THE WITNESS: I'll take the Fifth Amendment.

450

24 Q. To your knowledge, did any basketball players
25 sign in for work study financial aid programs when they

451

1 weren't working?

12 A. I'll take the Fifth Amendment, please.