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**RONNIE DUNN**

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**RUSTY CAMP**

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\* \* \*

1 (Transcript of prior proceedings not requested  
2 herein.)

3 MR. SCHMID: Your Honor, the government calls Ronnie  
4 Dunn.

5 RONNIE DUNN,  
6 having been duly sworn, was examined, and testified as follows:

7 DIRECT EXAMINATION

8 BY MR. SCHMID:

9 Q. Good morning.

10 A. Good morning.

11 Q. Could you tell us your name, please.

12 A. Ronnie Dunn.

13 Q. Where do you live, sir?

14 A. Nashville, Tennessee.

15 Q. What is your profession or occupation?

16 A. Singer/songwriter.

17 Q. How long have you been a singer/songwriter?

18 A. For about 15 years.

19 Q. Are you part of a particular country music duo?

20 A. Yes, sir.

21 Q. What is the name of that group?

22 A. Brooks & Dunn.

23 Q. You've won a number of awards in the country music area  
24 over the years; is that correct?

25 A. We have.

1 Q. Is it true that you were recently named Vocal Duo of the  
2 Year?

3 A. Yes, sir.

4 Q. And you have received that for ten or so years in the past?

5 A. I believe so.

6 Q. Have your albums with Mr. Brooks sold over 25 million  
7 copies all over the world?

8 A. Yes.

9 MR. RUSSELL: Your Honor, if it please the Court?  
10 I'm going to object to -

11 THE COURT: We're not going to have a singing  
12 lesson. Let's get on with the trial.

13 MR. RUSSELL: For purposes of the government's case,  
14 Your Honor, we will stipulate Mr. Dunn is a celebrity, and I am  
15 a big fan.

16 THE COURT: Now that we've got that out of the way,  
17 let's get on with the trial.

18 MR. SCHMID: Very good.

19 Q. Did there come a point in time when you heard of Russ  
20 Bellar or Bellar's Place?

21 A. Yes, sir.

22 Q. From whom did you first hear about Russ Bellar or Russ  
23 Bellar's Place?

24 A. A friend we had known for years through some NASCAR people,  
25 Hank Jones through Charlotte.

1 Q. Did there come a point in time when you spoke to  
2 Mr. Bellar?

3 A. Yes, sir.

4 Q. Did he invite you to come visit in Indiana to his hunting  
5 facility at Bellar's Place?

6 A. He did through Mr. Jones. Mr. Jones is actually the one  
7 who invited me to come with him.

8 Q. And did you eventually go to Indiana and visit Mr. Bellar?

9 A. We did.

10 Q. When you went there, was it for the purpose to go hunting  
11 the first time you were there?

12 A. Yes, uh-huh.

13 Q. Was there snow on the ground?

14 A. It was snowing, yeah.

15 Q. Was that in the fall of 2000 or late fall 2000?

16 A. I believe it was, yeah.

17 Q. Did you go hunting that time?

18 A. We were supposed to, but the weather was prohibitive, so we  
19 didn't spend a great deal of time there. Probably a half a  
20 day. Mr. Jones and I were split up, and I rode around with  
21 Mr. Bellar and we toured the place.

22 Q. When you rode around with Mr. Bellar, what did he show you  
23 on the property and what did he say to you?

24 A. He said he had 1,500 acres. He said that it was a  
25 high-fenced facility, and we mostly just saw deer everywhere.

1 Q. You didn't hunt that time; the weather was bad?

2 A. Yes, sir.

3 Q. Did you come back to Bellar's Place in approximately  
4 January of 2001?

5 A. I did, yes.

6 Q. Did you get an opportunity to meet with Mr. Bellar then?

7 A. We did.

8 Q. Was Mr. Bellar the person that you met with and rode around  
9 with while you were at Bellar's Place?

10 A. Yes, sir.

11 Q. And he was the person you dealt with there; is that  
12 correct?

13 A. Right.

14 Q. When you went back in January of 2001, were you accompanied  
15 by anybody in your family?

16 A. I had my son.

17 Q. How old was he?

18 A. He was 17, almost 18.

19 Q. What was Mr. Bellar offering you by way of an opportunity  
20 at his place, Bellar's Place?

21 MR. RUSSELL: I'm going to object, Your Honor. I'm  
22 not sure who is testifying, Mr. Schmid, or Mr. Dunn.

23 MR. SCHMID: I'm just asking what opportunity he was  
24 offered.

25 THE COURT: That's overruled.

1 BY MR. SCHMID:

2 Q. What opportunity did Mr. Bellar offer you when you were  
3 there?

4 A. At the time he said they were developing a huge commercial  
5 hunting facility to facilitate hunters from across the country  
6 and asked if I would mind using my likeness on a promotional  
7 brochure when they got it up and going.

8 Q. And you said it was okay to use your picture and likeness?

9 A. I did.

10 Q. Did he allow you to hunt on the property?

11 A. He did.

12 Q. And kill a deer?

13 A. Yes.

14 Q. What weapon or firearm did you use, if you remember?

15 A. I used his rifle. I'm not sure what caliber it was.

16 Q. And it was a rifle?

17 A. It was.

18 Q. Had you hunted before the time that you went to Bellar's  
19 Place?

20 A. No, I did not. I didn't hunt, no.

21 Q. You had not been a hunter prior to this?

22 A. No.

23 Q. Your son, had he been a hunter prior to this?

24 A. I believe this was his first time.

25 Q. Who accompanied you while you did the hunting at Bellar's

1 Place?

2 **A.** Mr. Bellar.

3 **Q.** Did he point out the deer that he wanted you to shoot and  
4 kill?

5 **A.** He did.

6 **Q.** What words did he use when you saw the deer?

7 **A.** Well, there was a herd of deer, and I was instructed to  
8 shoot - I don't know - like the second one from the front.

9 **Q.** And you actually did the shooting?

10 **A.** I did.

11 **Q.** Did you have a hunting license from the State of Indiana of  
12 any kind when you did this?

13 **A.** No, sir.

14 THE COURT: Answer?

15 BY MR. SCHMID:

16 **Q.** Did Mr. Bellar tell you -

17 THE COURT: Wait a minute. I didn't get the answer  
18 to the hunting license question.

19 THE WITNESS: I did not have one, no.

20 THE COURT: No. Okay.

21 BY MR. SCHMID:

22 **Q.** Did Mr. Bellar tell you that you needed a hunting license?

23 **A.** No. We were told that it was a private facility and that  
24 it was handled like a ranch.

25 **Q.** And he told you that you didn't need a license?

1     **A.**    Correct.

2     **Q.**    When you went hunting, how did you arrive in Indiana? Did  
3     you fly in, take a bus in? How did you get there?

4     **A.**    The first time in all of the years that I traveled I missed  
5     the plane, a commercial plane, and I felt bad about not meeting  
6     Mr. Jones, so I leased a plane and flew up.

7     **Q.**    So you leased a plane to come up to Bellar's Place?

8     **A.**    I did.

9     **Q.**    The first time that you just visited and didn't hunt, who  
10    took you around the property?

11    **A.**    Mr. Bellar.

12    **Q.**    The second time, how did you get up to Indiana?

13    **A.**    We flew commercial.

14    **Q.**    Okay. Did your son get an opportunity to hunt and kill a  
15    deer while he was there?

16    **A.**    He did.

17                 MR. SCHMID: Your Honor, may I approach the witness?

18                 THE COURT: You may.

19    BY MR. SCHMID:

20    **Q.**    Mr. Dunn, I would like to show you several photographs that  
21    have been marked as a group exhibit, Government Exhibit 16.

22                 I just want to ask you, Mr. Dunn, to take a look at  
23    these photographs that make up Government Exhibit 16, and ask  
24    you if you recognize yourself in each of those five  
25    photographs?

1     **A.**   Yes, sir.

2     **Q.**   Are those photographs taken with the deer that you shot and  
3     killed on Bellar's Place at Mr. Bellar's direction?

4     **A.**   Yes, sir.

5     **Q.**   Okay.

6                   MR. SCHMID:  Your Honor, I would move the  
7     introduction of Government Exhibit 16.

8                   MR. RUSSELL:  No objection, Your Honor.

9                   THE COURT:  16 is admitted.

10    BY MR. SCHMID:

11    **Q.**   Let me also show you what's been marked as Government  
12    Exhibit 13, the brochure.  Is that your likeness -

13    **A.**   It is.

14    **Q.**   - on the front with the picture of the deer that you shot  
15    and killed?

16    **A.**   Yes, sir.

17    **Q.**   Now, you had agreed to allow your picture to be used in the  
18    promotional materials and Mr. Bellar did not charge you money  
19    for the hunt; is that correct?

20    **A.**   Correct.

21    **Q.**   Did you eventually get the deer and deer head back to  
22    Tennessee where you live?

23    **A.**   I did.

24    **Q.**   Let me show you what's marked as Government Exhibit 14.  Do  
25    you recognize this (indicating), sir?

1     **A.** It looks like it.

2     **Q.** Okay. Is this the mounted deer antlers and deerskin from  
3 the deer that you shot and killed at Bellar's Place  
4 (indicating)?

5     **A.** It seems to be, yes.

6     **Q.** Okay.

7                   MR. SCHMID: Your Honor, I would move the  
8 introduction of Government Exhibit 14, please.

9                   MR. RUSSELL: May we take a look at it, Counsel?

10                  MR. SCHMID: Sure.

11                  MR. RUSSELL: No objection.

12                  THE COURT: What's the number again?

13                  MR. SCHMID: Number 14, Your Honor.

14                  THE COURT: 14 is admitted.

15 BY MR. SCHMID:

16     **Q.** Mr. Dunn, let me show you Government Exhibit 15. Is this  
17 the mounted antlers and deerskin from the buck that your son  
18 shot and killed at Bellar's Place on the same trip with you  
19 (indicating)?

20     **A.** It looks like it, yes.

21                   MR. SCHMID: Your Honor, I would move the  
22 introduction of Government Exhibit 15.

23                   MR. RUSSELL: No objection, Your Honor.

24                   THE COURT: Number again, Mr. Schmid?

25                   MR. SCHMID: Number 15, Your Honor.

1 THE COURT: 15 is admitted.

2 BY MR. SCHMID:

3 Q. The area that you hunted in, was that a fenced-in area that  
4 you saw, some high fencing?

5 A. It was.

6 Q. Did you measure the size of the area that you hunted in?

7 A. No, I didn't.

8 Q. Did Mr. Bellar tell you how large the enclosure was while  
9 you were there?

10 A. No. We were told there was, I think, a total of 1,500  
11 acres.

12 Q. But the pen you were in was quite a bit smaller than that  
13 total land area for the whole place, correct?

14 A. Yeah. The pen you're referring to, you couldn't see the  
15 end of it from where we were.

16 Q. So you saw fencing at one part but couldn't see the fencing  
17 at the other?

18 A. Correct. We went through a gate.

19 Q. Okay. One last thing, Mr. Dunn. I would like you to put a  
20 pushpin, if you will, on this map of the United States where  
21 you live and where the deer head antlers and skins were shipped  
22 to you (indicating).

23 A. Well, Nashville (indicating), without glasses.

24 Q. Thank you very much.

25 A. The deer head was delivered to me by Mr. Jones, Hank Jones.

1 Q. Hank Jones?

2 A. In Charlotte, North Carolina, during a show.

3 Q. Okay. And eventually did it make its way over to  
4 Tennessee?

5 A. It did, yes.

6 Q. Mr. Hank Jones is the NASCAR person that you mentioned that  
7 first told you about Mr. Bellar?

8 A. Correct.

9 MR. SCHMID: Your Honor, that concludes my  
10 questions.

11 Thank you.

12 THE COURT: We get a new lawyer cross-examining  
13 here?

14 MR. RUSSELL: Yes, Your Honor.

15 THE COURT: Welcome to the fold. You might want to  
16 remind the jury of your name. Fame is very fleeting, you know.

17 MR. RUSSELL: Thank you, Your Honor.

18 Mr. Dunn, my name is Joe Russell. I'm one of the  
19 lawyers for Mr. Bellar.

20 Ladies and gentlemen of the jury, Joe Russell.

21 CROSS-EXAMINATION

22 BY MR. RUSSELL:

23 Q. Welcome back to Indiana, Mr. Dunn.

24 A. Thank you.

25 Q. Mr. Dunn, when you were at Bellar's Place the first time

1 and drove around with Mr. Bellar - is that correct?

2 **A.** Yes, sir.

3 **Q.** - he showed you the place and told you all about the place;  
4 isn't that correct?

5 **A.** Yes, sir, he did.

6 **Q.** You said that you saw lots of deer. In fact, you saw  
7 hundreds of deer, did you not?

8 **A.** I believe so, yes.

9 **Q.** Those deer were all sizes and ages?

10 **A.** Yes.

11 **Q.** In fact, Bellar's Place, from your view - the first and the  
12 second times - was a rather large and well-maintained place,  
13 was it not?

14 **A.** It seemed to be, yes.

15 **Q.** Did the deer seem to be cared for?

16 **A.** Yeah. They were very big.

17 **Q.** In other words, they weren't malnourished?

18 **A.** No, not a bit.

19 **Q.** You didn't notice a lot of sick deer around, did you?

20 **A.** No.

21 **Q.** All right. The people at Bellar's place, including  
22 Mr. Bellar, gave you every indication that that was a private  
23 hunting farm, did they not?

24 **A.** Yes, sir.

25 **Q.** And, in fact, when you spoke with Mr. Bellar upon your

1 visits, he did admit to you or say to you that those were his  
2 deer, did he not?

3 **A.** Correct.

4 **Q.** And, in fact, I believe you testified that someone at  
5 Bellar's Place - I assume that was Mr. Bellar - told you that  
6 you could shoot what you wanted to shoot because it was his  
7 private property; isn't that correct?

8 **A.** Yes.

9 **Q.** Now, Mr. Dunn, you've testified that someone told you you  
10 did not need a license, hunting license. That was not  
11 Mr. Bellar, was it?

12 **A.** I believe it was, yes.

13 **Q.** You do believe it was?

14 **A.** Uh-huh.

15 **Q.** Are you sure it wasn't Mr. Jones?

16 **A.** It could have been Mr. Jones. I know the strong  
17 implication was that it was not necessary. No, Mr. Bellar did  
18 as we were driving around in the truck. I remember talking  
19 about the legality of the issue and stuff, and he said, "No,  
20 since it's a private facility, it's not necessary."

21 **Q.** He told you they were his deer, right?

22 **A.** Correct.

23 **Q.** With respect to the pen that the prosecutor asked you  
24 about, it's a fact that you told federal agents that that pen  
25 was approximately 30 acres large, did you not?

1     **A.** That's a guesstimation.

2     **Q.** Okay. But 30 acres would be more accurate than 10, say?

3     **A.** Yes.

4     **Q.** Did Mr. Bellar tell you that he provided veterinarian care  
5 for his deer that were on his farm?

6     **A.** I don't recall that conversation.

7     **Q.** Did he also tell you that he also paid Indiana state  
8 property tax on those deer?

9     **A.** I don't recall that.

10    **Q.** You don't recall him telling you that?

11                    Do you know whether or not Mr. Bellar was licensed  
12 by the State of Indiana to possess those deer?

13    **A.** No, sir, I don't know that.

14    **Q.** Mr. Bellar talked to you about his breeding activity, did  
15 he not?

16    **A.** A little bit, yeah.

17    **Q.** Did you get a chance to look at the lodge while you were  
18 there?

19    **A.** There was no lodge. It was prior to that. I think it was  
20 in its development stages.

21    **Q.** So you didn't look at or stay at the lodge?

22    **A.** No, there was no lodge.

23    **Q.** At any time during your first or second visit to the farm,  
24 did Mr. Bellar guarantee you that you would be able to shoot a  
25 deer while you were there?

1     **A.**   Yeah.

2     **Q.**   He used the word "guarantee"?

3     **A.**   He said, "You'll get a deer if you come here."

4     **Q.**   Okay. Did you take that as a guarantee that you would  
5     shoot a deer?

6     **A.**   Well, the first time we went we didn't, so -

7     **Q.**   So apparently the guarantee didn't hold on the first time,  
8     right?

9     **A.**   No.

10    **Q.**   And I believe you testified that the second visit, that was  
11    your first deer that you had killed; is that correct?

12    **A.**   Yes, I believe it was.

13    **Q.**   Have you killed deer since then?

14    **A.**   I have.

15    **Q.**   With respect to the weapon you used, the prosecutor asked  
16    you about the weapon, and you said it was a rifle but you  
17    weren't sure of the caliber. Are you familiar with firearms,  
18    Mr. Dunn?

19    **A.**   A little bit. Not a lot.

20    **Q.**   But you don't have any idea what the caliber of that was?

21    **A.**   No, huh-uh. I know it was a black composite gun with a  
22    silver scope.

23    **Q.**   A silver scope?

24    **A.**   Uh-huh.

25    **Q.**   Mr. Dunn, at one point I believe you told the federal

1 agents that Mr. Bellar told you that this was a private deer  
2 farm and shooting deer on that farm was like slaughtering  
3 cattle; is that correct?

4 **A.** I don't know if I used the word "slaughter," but it was,  
5 yeah, like that.

6 **Q.** You don't know if that was your word, "slaughtering  
7 cattle"?

8 **A.** I don't know that.

9 **Q.** Well, did he give you the idea of killing cattle?

10 **A.** Yes, it was the same principle.

11 **Q.** All right. Mr. Dunn, the government has indicated to you  
12 that they believe you've committed wrongful acts; is that  
13 correct?

14 **A.** No.

15 **Q.** They've never indicated to you that they believe you may  
16 have committed a criminal act by shooting that deer with a  
17 rifle on Bellar's Place?

18 **A.** No. Not directly, no.

19 **Q.** Well, what have they said indirectly?

20 **A.** I was asked what we did when we went there to hunt.

21 **Q.** Have you been assured that you won't be prosecuted?

22 **A.** No.

23 **Q.** They seized your deer. Are you going to get those deer  
24 back?

25 **A.** I don't know.

1 Q. So they haven't even talked to you about that?

2 A. No.

3 MR. RUSSELL: Excuse me, Your Honor, just a moment?

4 THE COURT: Sure.

5 (Brief pause in the proceedings.)

6 MR. RUSSELL: Nothing further.

7 MR. SCHMID: Just a question or two, Your Honor.

8 REDIRECT EXAMINATION

9 BY MR. SCHMID:

10 Q. Your son, did he use a rifle, as well?

11 A. He did.

12 Q. What caliber was that, do you remember?

13 A. It was a .30-06.

14 Q. Thank you.

15 MR. SCHMID: Nothing further.

16 MR. RUSSELL: Follow up, Your Honor?

17 THE COURT: Sure.

18 RECROSS-EXAMINATION

19 BY MR. RUSSELL:

20 Q. Mr. Dunn, how do you know your son's rifle was a .30-06?

21 A. That was my rifle. I brought it down.

22 Q. So you brought it to Indiana the second time?

23 A. Yes, I did.

24 Q. So you know that was a .30-06?

25 A. Uh-huh.

1 MR. RUSSELL: Nothing further, Your Honor.

2 MR. SCHMID: Nothing further, Your Honor.

3 Thank you.

4 THE COURT: You're excused.

5 MR. SCHMID: Your Honor, the government calls Rusty  
6 Camp.

7 THE COURT: Stand by the witness chair and be sworn,  
8 please.

9 (The witness was duly sworn.)

10 THE COURT: Be seated there and be sure to talk into  
11 the end of that because I have a hunch we're going to have a  
12 little problem hearing you. It will help you and help us.

13 RUSTY CAMP,

14 having been duly sworn, was examined, and testified as follows:

15 DIRECT EXAMINATION

16 BY MR. SCHMID:

17 Q. Could you tell us your name, please.

18 A. Rusty Camp.

19 Q. Where do you live, sir?

20 A. Aberdeen, Mississippi.

21 Q. What is your current occupation or employment?

22 A. Minor league baseball.

23 Q. How long have you been a professional baseball player?

24 A. Five years.

25 Q. What organization are you currently assigned to or under