

JAN 07 2005

GARY M. BLAIR, Executive Officer  
BY *Carrie L. Wagner*  
CARRIE L. WAGNER, Deputy Clerk

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9 Attorneys for Plaintiff

8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
9 **FOR THE COUNTY OF SANTA BARBARA**  
10 **COOK STREET DIVISION**

11  
12 PEOPLE OF THE STATE OF CALIFORNIA, ) Case No. 1133603  
13 Plaintiff, )  
14 vs. ) **REDACTED VERSION**  
15 MICHAEL JOE JACKSON, ) REQUEST FOR ATTENDANCE  
16 Defendant. ) OF OUT-OF-STATE WITNESS.  
17 ) MARTIN BASHIR

18 TO THE SUPERIOR COURT OF SANTA BARBARA, COUNTY OF SANTA BARBARA.  
19 STATE OF CALIFORNIA:

20 The undersigned, Assistant District Attorney for the County of Santa Barbara, State of  
21 California, hereby states and certifies as follows:

22 1. That there is now pending in this court, the above-entitled criminal prosecution by the  
23 State of California against the above entitled wherein he stands accused of 1 Count of Penal Code  
24 section 182 (Conspiracy to Commit Extortion, False Imprisonment and Child Abduction), 4 Counts  
25 of Penal Code section 288a (Child Molestation) and 1 Count of Penal Code section 664/288a  
26 (Attempted Child Molestation), and 4 Counts of Furnishing An Intoxicant for Purposes of  
27 Committing a Felony.

28 2. That the said defendant's trial is set to begin January 31, 2005, in the above-named

1 court. It is expected that the witness would be required to testify on or about March 1, 2005 or on  
2 any subsequent adjourn date that his testimony shall be adjourned or continued to.

3 3. The witness is presently employed by ABC as a reporter for the news show "20/20".

4 4. That the said Martin Bashir, now residing at New York County, New York, is a  
5 necessary and material witness for the People of the State of California. The witness is material on  
6 the issue of the production, editing and displaying of the video documentary "Living with Michael  
7 Jackson."

8 5. Martin Bashir is a reporter who lived and traveled with Michael Jackson for about  
9 seven months for the purpose of producing a documentary about his life. The documentary titled  
10 "Living with Michael Jackson" aired in England and in the United States in February 2003.

11 Bashir narrated the documentary and frequently commented on Mr. Jackson's  
12 relationship with children. He found particularly worrisome Jackson's practice of sleeping in the  
13 same room with children, often in the same bed.

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18 Conversations with the Defendant concerning his sleeping arrangement with children.  
19 and particularly with the victim of the current case, are clearly material, relevant and necessary to  
20 the prosecution in Santa Barbara County.

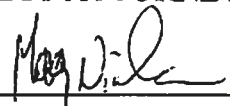
21 It is believed that Mr. Bashir had numerous conversations with Mr. Jackson about  
22 his relationship with young boys and with the victim in particular. The documentary "Living with  
23 Michael Jackson" as presented is less than two hours in length meaning seven months of interviews  
24 and film were substantially edited. Mr. Bashir is a necessary witness to establishing the foundation  
25 for the admissibility of the documentary. He will also clarify the extent to which the documentary  
26 was edited and whether or not the statements were presented out of context.

1 6. That if the said witness, as such witness, comes into the State of California in obedience  
2 to a summons directing to attend and testify at said jury trial, the laws of the State of California, and  
3 of any other state through which said witness may be required to pass by the ordinary course of travel  
4 to attend such jury trial, give protection from arrest or the service of process, either civil or criminal,  
5 in connection with matters which arose before entrance into said state pursuant to said summons.

6 WHEREFORE, it is requested for and on behalf of the State of California that your  
7 Honor certify to the above and foregoing by the issuance of a certificate thereto under the seal of the  
8 said Superior Court of the County of Santa Barbara, State of California, so that it may be presented to  
9 a judge of the court of record in the State of New York, in a proceeding to compel the attendance of  
10 said Martin Bashir, as a witness at said proceeding at the time and date above set forth and pursuant  
11 to law.

12 Dated December 15, 2004, in the County of Santa Barbara, State of California.

13 Respectfully submitted,  
14 THOMAS W. SNEDDON, JR.  
15 DISTRICT ATTORNEY

16 for By:   
17 PATRICK J. McKINLEY  
18 ASSISTANT DISTRICT ATTORNEY