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3 Susan C. Yu, State Bar Number 195640
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FILED
SUPERIOR COURT OF CALIFORNIA
COUNTY OF SANTA BARBARA

JUL 30 2004

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

7 **KATTEN MUCHIN ZAVIS ROSENMAN**
8 Steve Cochran, State Bar Number 105541
9 Stacey McKee Knight, State Bar Number 181027
10 2029 Century Park East, Suite 2600
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14 Attorneys at Law
15 Robert M. Sanger, State Bar No. 058214
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18 Telephone: (805) 962-4887
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20 **OXMAN & JAROSCAK**
21 Brian Oxman, State Bar Number 072172
22 14126 E. Rosecrans
23 Santa Fe Springs, CA 90670
24 Telephone: (562) 921-5058 Facsimile: (562) 921-2298

25 Attorneys for Defendant MICHAEL JOSEPH JACKSON

26 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
27 **FOR THE COUNTY OF SANTA BARBARA, COOK DIVISION**

28 **THE PEOPLE OF THE STATE OF**
29 **CALIFORNIA,**

30 Plaintiffs,

31 vs.

32 **MICHAEL JOSEPH JACKSON,**

33 Defendant.

) Case No. 1133603

) STATUS REPORT

) FILED UNDER SEAL

) Honorable Rodney S. Melville

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35
36 TO THE CLERK OF THE ABOVE ENTITLED COURT AND TO THE DISTRICT
37 ATTORNEY OF THE COUNTY OF SANTA BARBARA, TOM SNEDDON, AND DEPUTY
38

*unsealed pursuant
to 6116105 court
order

STATUS REPORT

1 DISTRICT ATTORNEYS GERALD FRANKLIN, RON ZONEN, AND GORDON
2 AUCHINCLOSS:

3 We respectfully file this Status Report with the Court at this time in order to inform the Clerk
4 of discrepancies which seem to exist between the clerk's list of search warrants, provided to both
5 counsel on July 29, 2004.¹ We also intend to continue to meet and confer with the prosecution on
6 these matters, however, given the short time period between now and the telephonic hearing on
7 August 6, 2004, we felt it useful to provide this document for the Court. If we are able to resolve
8 any or all of the issues before the 6th, we will advise the Court immediately.

9
10 Dated: July 30, 2004

COLLINS, MESEREAU, REDDOCK & YU
Thomas A. Mesereau, Jr.
Susan C. Yu

12 KATTEN MUCHIN ZAVIS ROSENMAN
Steve Cochran
13 Stacy McKee Knight

14 SANGER & SWYSEN
Robert M. Sanger

15 OXMAN & JAROSCAK
16 Brian Oxman

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18 By: 

19 Robert M. Sanger
Attorneys for Defendant
20 MICHAEL JOSEPH JACKSON

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27 ¹ The Court has indicated that it did not accept letters or other unofficial correspondence from the
28 parties and, therefore, we are filing this Status Report as a formal paper.

STATUS OF PRODUCTION OF SEARCH WARRANTS, AFFIDAVITS AND RETURNS

I have reviewed the search warrants in our possession and compared them to the list furnished to us by Judge Melville's secretary, Carrie Wagner (Attached hereto as Exhibit A), and have concluded the following:

Of the 69 search warrants listed by the court, we are missing search warrant numbers 884686; 884689A; 884689B; 4912, 4953 and 5048A. In addition, the District Attorney's office sent us a copy of 4959 which does not appear on the court's list.

As to the 72 or 73 search warrants, 14 have affidavits which appear to be complete; 10 affidavits have been redacted; and 48 or 49 we have not received at all.

Most of the returns are missing. We do have information on 18 of the returns. However, most of those returns were pulled from discovery and not supplied with the search warrants. Therefore, there is no way for us to be sure that the information we have is complete or accurate.

Furthermore, we received from the District Attorney's office search warrants for Neverland Ranch, Brad Miller's office and Hamid Moslechi's home. These were not numbered.¹

I have attached a chart indicating the search warrants, affidavits and returns that we have received, and have attached it hereto as Exhibit B.

CERTIFIED COPIES

The prosecution has not provided any certified copies of any of the search warrants, affidavits or returns as filed with the court. The copies that were provided by the District Attorney were either provided in the course of discovery or in a separate packet provided by Mr. Sneddon. One search

¹We were also provided two telephonic search warrants, one for the mattress at Neverland Ranch and one for the storage related to Brad Miller. A third telephonic warrant was testified to at the Grand Jury proceedings but neither the court nor the District Attorney make reference to it. Therefore of the 69 warrants listed by the court, we have what purport to be 63 of them. However, we have five which do not have numbers at all, one which may be what the court refers to as 884686.

We also have testimony that there may be an additional telephonic search warrant issued at Neverland Ranch. That means we have 63 of the 69 listed by the court and reason to believe that there are as many as 73 or 74. However, there is reference in subsequent search warrant affidavits filed of a search warrant numbered 8844686. This may refer to the original affidavit for these three warrants and therefore, the court's reference to 884686 may refer to one of said warrants. In which case either the court dropped a digit or the District Attorney added one. However, that number would account for only one of the three search warrants.

1 warrant was not provided by the District Attorney at all but was furnished by the counsel for the
2 entity served. None of the documents have been conformed with the official filing stamp of the
3 court.

4 The defense has no means by which to determine if any of the documents were, in fact, filed
5 with the court in the form provided to us. Furthermore, some of the documents are missing pages,
6 some are redacted and some do not appear to have all blanks filled in thereby indicating that, either
7 the court's files also contain defective documents or that the defense has not been provided with
8 copies of the actual filed documents.

9 GOOD FAITH EFFORT TO RESOLVE

10 The court asked that counsel make a good faith effort to resolve this short of an order that
11 the defense be provided with certified copies of all search warrant documents filed with the
12 court. Due to the shortness of time before the August 6, 2004 telephonic hearing, we are
13 respectfully filing this status report with the court at the same time that we are serving the same
14 on the District Attorney. We have previously served the District Attorney with a copy of an
15 earlier version of Exhibit "B" which was attached as Exhibit "A" to our Motion to Suppress (Part
16 2), dated June 29, 2004. We also note that the District Attorney's records seem to be inconsistent
17 with the those of the clerk of the court and both the clerk and the District Attorney seem to be
18 unaware of at least one Search Warrant.

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1 We will continue to meet and confer in good faith to resolve this issue but, respectfully,
2 file this at this time for the information of the clerk and the court.

3
4 Dated: July 30, 2004

Respectfully submitted,

5 COLLINS, MESEREAU, REDDOCK & YU
6 Thomas A. Mesereau, Jr.
Susan C. Yu

7 KATTEN MUCHLIN ZAVIS ROSENMAN
8 Steve Cochran
Stacey McKee Knight

9 SANGER & SWYSEN
Robert M. Sanger

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11 Brian Oxman

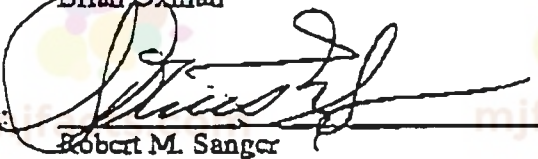
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13 By: 
14 Robert M. Sanger
15 Attorneys for Defendant
16 MICHAEL JOSEPH JACKSON
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EXHIBIT A

SEARCH WARRANT NUMBERS IN MICHAEL JACKSON CASE AS OF JULY 28, 2004

Date	Number
11/17/03	884686

11/18/03 884689B

12/4/03 884689A

1/22/04 4896

4897

4898

4899

4900

4901

4902

2/2/04 4912

4913

4914

4915

2/18/04 4926

3/2/04 4946

3/4/04 4953

4/2/04 4976

4977

4/21/04 4977a

5/3/04 4998

5/14/04 5005

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5008

5/20/04 5015

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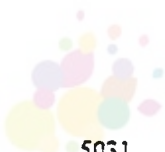
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5/26/04 5035

6/11/04 5047

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6/17/04 5070

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7/2/04 5048a addendum



mjfacts.com



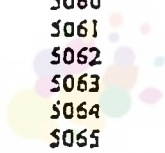
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EXHIBIT B

People v. Michael Jackson
Santa Barbara Superior Court Case No. 1133603
Search Warrants

SW#	A f f	R e t	Court List	Date Signed	Recvd from DA	Redacted	Location
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1	No # Could be 884686 or 8844686	X	X		11/17/03 Served on 11/18/03 8:47 a.m.	X		Neverland Ranch [REDACTED]
2	No #		X		11/17/03 Served on 11/18/03 9:00 a.m.	X		Hamid Moslehi [REDACTED] [REDACTED]
3	No #		X		11/17/03 Served on 11/18/03 9:30 a.m.	X		Brad Miller [REDACTED]
4	No #	X			11-18-03	X		Neverland Ranch Telephonic Search Warrant for Mattress
5	No #							Neverland Ranch Telephonic Search Warrant
6	No #.	X	X		11-18-03			Brad Miller Telephonic Search Warrant for Miller Storage Unit
7	4896	X	X	X	1/22/04	X	Redacted Aff	AT & T Wireless

People v. Michael Jackson
Santa Barbara Superior Court Case No. 1133603
Search Warrants

SW#	A f f	R e t	Court List	Date Signed	Recvd from DA	Redacted	Location
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8	4897	X	X	X	1/22/04	X	Redacted Aff	Verizon California, Inc. 2701 S. Johnson St San Angelo, TX 76902 888-483-2600
9	4898	X	X	X	1/22/04	X	Redacted Aff	Cellco Partnership dba Verizon
10	4899	X	X	X	1/22/04	X	Redacted Aff	Pacific Bell
11	4900	X	X	X	1/22/04	X	Redacted Aff	T-Mobile USA
12	4901	X	X	X	1/22/04	X	Redacted Aff	Nextel Communications 333 South Inverness Drive Englewood, CO 80235 303-721-3400
13	4902	X	X	X	1/22/04	X	Redacted Aff	Cingular Wireless 4420 Roserwood Drive Pleasanton, CA 94588 925-227-4399
14	4912			X				Unknown
15	4913		X	X	1/30/04	X		Robinson Residence [REDACTED] [REDACTED]
16	4914	X		X	2/02/04	X	Redacted Aff	Computer hard drives previously seized from Neverland and 8322 Lester Avenue, West Hills, CA
17	4915	X	X	X	1/31/04	X		Marc Schaffel [REDACTED] [REDACTED]

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SW#	A f f	R e t	Court List	Date Signed	Recvd from DA	Redacted	Location
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18	4926	X		X	2/20/04	X		US Bank 2221 Santa Monica Blvd. Santa Monica, CA
19	4946	X	X	X	3/8/04	X		Shurgard Storage 22222 Ventura Blvd. Woodland Hills, CA
20	4953			X	3/16/04			Air Apparent 5432 West 104 th Street Los Angeles, CA 90045 310-649-0064 Rcvd from Air Apparent
21	4959	X			3/04/04	X		Air Apparent 5432 West 104 th Street Los Angeles, CA 90045 310-649-0064
22	4976	X	X	X	04/02/04	X		RCN Internet 105 Carnegie Center Pennington NJ 08540 703-280-8793
23	4977	X	X	X	04/02/04	X	Redacted Aff	Verizon California, Inc. 2701 S. Johnson St. P.O. Box. 1001 Mail Code TxD01613 San Angelo, TX 76902-1001 888-483-2600 Phone 325-224-3038 Fax [REDACTED]

People v. Michael Jackson
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SW#	A f f	R e t	Court List	Date Signed	Recvd from DA	Redacted	Location
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24	4977A	X	X	X	04/02/04	X	Redacted Aff Verizon California, Inc. 2701 S. Johnson St. P.O. Box 1001 Mail Code TxD01613 San Angelo, TX 76902-1001 888-483-2600 Phone 325-224-3038 Fax [REDACTED]
25	4998			X	05/03/04	With request for more time	Washington Mutual Bank P.O. Box 2151 Chatsworth, CA 91313
26	5005	X	X	X	05/14/04	X	Bank of America 1000 West Temple Street Los Angeles, CA 90012 Served on local SB branch
27	5006	X		X	05/14/04	X	Transunion Legal Process 555 West Adams Street Chicago, ILL
28	5007	X		X	05/14/04	X	Equifax Legal Process 211 Perimeter Center Parkway Atlanta, GA 678-795-7954
29	5008	X		X	05/14/04	X	Experian Credit Bureau P.O. Box 1240 Allen, TC 75013

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SW#	A f f	R c t	Court List	Date Signed	Recvd from DA	Redacted	Location
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30	5015	X		X	05/20/04	X	Verizon 2701 S. Johnson St. San Angelo, TX 76902-1001 325-949-6916
31	5016			X	05/20/04	X	Verizon Pennsylvania 1095 Ave of the Americas 29 th Floor, NY NY 10036
32	5017			X	05/20/04	X	Verizon Virginia 1095 Ave of the Americas 29 th Floor, NY NY 10036
33	5018			X	05/20/04	X	RCN Corporation 105 Carnegie Center Princeton, NJ 08540
34	5019			X	05/20/04	X	Arch Wireless 3000 Technology Drive Plano TX 75074
35	5020		X	X	05/20/04	X	Qwest Communications 1005 17 th Street, Suite 120 Denver, Colorado
36	5021			X	05/20/04	X	Nextel 333 South Inverness Dr Englewood Col 80235
37	5022			X	05/20/04	X	Bell South 301 West Bay St Jacksonville, FLA 32301
38	5023			X	05/20/04	X	Pacific Bell 208 South Akard 10 th Flr Dallas TX 75202

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39	5024		X	05/21/04	X		Southern Bell SBC Subpoena Center 208 S. Akard Dallas, TX 75202
40	5025		X	05/20/04	X		Sprint Spectrum 6480 Sprint Parkway Overland, KS 66251
41	5026		X	05/20/04	X		Cingular Wireless 5600 Glenridge Ste G418 Atlanta GA 30342
42	5027		X	05/20/04	X		AT&T 685 Route 202-206 North 3 rd Flr Bridgewater, NJ 08807
43	5028		X	05/20/04	X		AT&T Wireless 801 Northpoint Parkway West Palm Beach, Fla 33416
44	5029		X	05/20/04	X		T Mobil USA 12920 SE 38 th Street Bellvue, WA 98006
45	5030		X	05/20/04	X		Cellco Partnership dba Verizon Wireless 51 Chubb Way Branchburg, NJ 08876
46	5031		X	05/20/04	X		Verizon New Jersey 1095 Ave of the Americas NY NY 10036
47	5032		X	05/20/04	X		Verizon NY 1095 Ave of the Americas NY NY 10036

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48	S035	X	X	05/26/04	X		AGRAS Billing
49	S047		X	06/11/04	X		American Express 888 South Figueroa Street #1770 Los Angeles, CA 90017
50	S048		X	06/11/04	X		CitiBank 12731 Jefferson Blvd 2 nd Floor Los Angeles, CA 90066
51	S048A		X				Citibank
52	S049		X	06/11/04	X		Banana Republic P.O. Box 29110 Shawnee Mission, Kansas 66203
53	S050		X	06/11/04	X		Bank One/First USA Bank 800 Brooksedge Blvd. Westerville, OH 43081
54	S051		X	06/11/04	X		Capitol One Bank Attn: DARE 11011 W. Broad Street Glen Ellen, VA 23260
55	S052		X	06/11/04	X		Chase NA 1 Chase Manhattan Plaza 20 th Floor New York, NY 10081
56	S053		X	06/11/04	X		Chevron/Standard Oil P.O. Box 5010 Concord, CA 94524
57	S054		X	06/11/04	X		Discover Financial Services Fax 847-973-0432

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SW#	A f f	R e t	Court List	Date Signed	Recvd from DA	Redacted	Location
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58	5055		X	06/11/04	X		Fleet Credit Card Services 680 Blair Mill Road Horsham, PA 19044
59	5056		X	06/11/04	X		First National Bank Brookings P.O. Box 3038 Evansville, IN 47730
60	5057		X	06/11/04	X		Ford Motor Corp. P.O. Box 239801 Las Vegas, NV 89123
61	5058		X	06/11/04	X		Household Bank 1441 Schilling Place Salinas, CA 93912
62	5059		X	06/11/04	X		Nissan Motor Acceptance Corp. 8900 Freeport Parkway, Irving TX 75063
63	5060		X	06/11/04	X		JC Penneys P.O. Box 981131 El Paso, TX 79998
64	5061		X	06/11/04	X		King Sizes 3150 Pnt Brooker Road Universal City, TX 78148
65	5062		X	06/11/04	X		Federated Dept. Stores [Bloomingdales/Macys] FACS Group, Dept. C P.O. Box 8053 Mason, OH 45040
66	5063		X	06/11/04	X		MBNA 1100 North King Street Wilmington DE 19850

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SW#	A f f	R e t	Court List	Date Signed	Recvd from DA	Redacted	Location
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67	5064		X	06/11/04	X		Mercedes Benz Credit Corp. 650 Town Center Drive Costa Mesa, CA 92626
68	5065		X	06/11/04	X		Providian National Bank 295 Makin Street Tilton NH 03276
69	5066		X	06/11/04	X		Saxon [Meritech] Mortgage 4708 Mercantile Drive North Fort Worth, TX 76134
70	5067		X	06/11/04	X		Toyota Motor Credit 19001 South Western Avenue Mail Stop E112 Torrance, CA 90509
71	5068		X	06/11/04	X		Wells Fargo NA 1220 Concord Avenue Concord, CA 94520 925-686-7541
72	5070		X	06/17/04	X		CitiBank [Radio Shack] 701 E. 60 th Street North MC1251 Sioux Falls, SD 57117
73	5071		X	06/17/04	X		Cross Country Bank 800 Delaware Avenue Wilmington Delaware 19801

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PROOF OF SERVICE

I, the undersigned declare:

I am over the age of 18 years and not a party to the within action. I am employed in the County of Santa Barbara. My business address is 233 East Carrillo Street, Suite C, Santa Barbara, California, 93101.

On July 30, 2004, I served the foregoing document **STATUS REPORT** on the interested parties in this action by depositing a true copy thereof as follows:

Tom Sneddon
Gerald Franklin
Ron Zonen
Gordon Auchincloss
District Attorney
1105 Santa Barbara Street
Santa Barbara, CA 93101
568-2398

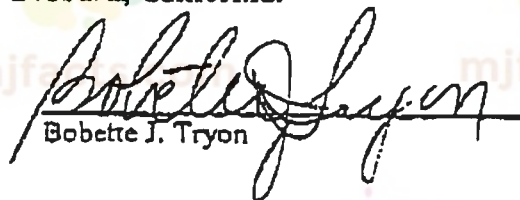
— **BY U.S. MAIL** - I am readily familiar with the firm's practice for collection of mail and processing of correspondence for mailing with the United States Postal Service. Such correspondence is deposited daily with the United States Postal Service in a sealed envelope with postage thereon fully prepaid and deposited during the ordinary course of business. Service made pursuant to this paragraph, upon motion of a party, shall be presumed invalid if the postal cancellation date or postage meter date on the envelope is more than one day after the date of deposit.

— **BY FACSIMILE** - I caused the above-referenced document(s) to be transmitted via facsimile to the interested parties at

☒ **BY HAND** - I caused the document to be hand delivered to the interested parties at the address above.

☒ **STATE** - I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed July 30, 2004, at Santa Barbara, California.


Bobette J. Tryon