

FILED
SUPERIOR COURT OF CALIFORNIA
COUNTY OF SANTA BARBARA

SEP 17 2004

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

THOMAS W. SNEDDON, JR., DISTRICT ATTORNEY
County of Santa Barbara
By: RONALD J. ZONEN (State Bar No. 85094)
Senior Deputy District Attorney
GORDON AUCHINCLOSS (State Bar No. 150251)
Senior Deputy District Attorney
GERALD McC. FRANKLIN (State Bar No. 40171)
Senior Deputy District Attorney
1112 Santa Barbara Street
Santa Barbara, CA 93101
Telephone: (805) 568-2300
FAX: (805) 568-2398

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SANTA BARBARA
SANTA MARIA DIVISION

* Unsealed pursuant
to 6/16/05 Court's
Order

THE PEOPLE OF THE STATE OF CALIFORNIA,

Plaintiff,

v.

MICHAEL JOE JACKSON,

Defendant.

No. 1133603

PLAINTIFF'S PROPOSED
REDACTION OF EXHIBITS
OFFERED IN CONNECTION
WITH PENDING MOTIONS TO
SUPPRESS EVIDENCE
(Pen. Code, § 1538.5)

DATE: September 17, 2004
TIME: 8:30 a.m.
DEPT: TBA (Melville)

~~UNDER SEAL~~

A. Introduction

Attached hereto are the People's proposed redactions of certain exhibits offered in connection with the pending motions by the defense to suppress evidence in this case.

B. Redacted Exhibits

The People propose that the following exhibits be released in redacted form:

Exhibits 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 21, 34 and 35. The proposed redactions are reflected on the copies of those exhibits attached hereto.

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1 C. Exhibits That May Be Released In Unredacted Form

2 The People respectfully submit that the following exhibits may be released in an
3 unredacted form: Exhibits Nos. 23, 24, 25, 27, 28, 31, 36, 39a, 39b, 40, 45, 46, 47, 48, 49, 50,
4 and 50a.

5 D. Exhibits That Do No Appear To Be "Redactable"

6 Exhibits 28, 29 and 30 are photographs and so cannot be redacted. Exhibit 41 is the
7 "cheat sheet" list of fictional names, prepared for the guidance of the witnesses. Redacting this
8 list would render Exhibit 41 meaningless. The People respectfully suggest that Exhibits 28,
9 29, 30 and 41 not be released.

10 E. Exhibits That May Already Have Been Redacted

11 Exhibits 20, 38 and 42 are search warrants. The People believe the Court has
12 already redacted these exhibits.

13 F. Exhibits The Status Of Which Is Presently Unresolved

14 Exhibit 1 is a copy of Item 200 on the Sheriff's property list. Exhibit 32 is a
15 stipulation concerning the testimony of Beverly Hills Police Officer Tinkler. Exhibit 44 is a
16 list of interview questions. The People are uncertain whether these exhibits should be released,
17 either in an unredacted or a redacted form, and the undersigned will address the Court
18 concerning them.

19 DATED: September 17, 2004

20 Respectfully submitted,

21 THOMAS W. SNEDDON, JR.
22 District Attorney

23 
24 _____

PROOF OF SERVICE

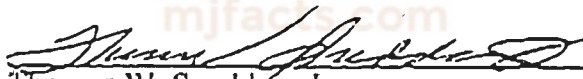
STATE OF CALIFORNIA }
COUNTY OF SANTA BARBARA } SS

I am a citizen of the United States and a resident of the County aforesaid; I am over the age of eighteen years and I am not a party to the within-entitled action. My business address is: District Attorney's Office; Courthouse; 1105 Santa Barbara Street, Santa Barbara, California 93101.

On September 17, 2004, I served the within PLAINTIFF'S PROPOSED REDACTION OF EXHIBITS OFFERED IN CONNECTION WITH PENDING MOTIONS TO SUPPRESS EVIDENCE on Defendant, by THOMAS A. MESEREAU, JR., STEVE COCHRAN, ROBERT SANGER, and BRIAN OXMAN by personally delivering a true copy thereof to them in open court.

I declare under penalty of perjury that the foregoing is true and correct.

Executed at Santa Maria, California on this 17th day of September, 2004.


Thomas W. Snedden, Jr.

March 26, 2003

BY MESSENGER

Mark J. Geragos, Esq.
Geragos & Geragos
350 S. Grand Ave., 39th Floor
Los Angeles, CA 90071

Re: [REDACTED] Jackson

Dear Mr. Geragos:

I represent [REDACTED] I assume you represent Michael Jackson and MJO Productions (hereinafter, collectively "Jackson"). If I am incorrect, please let me know which attorneys represent them so that I may contact them.

The purpose of this letter is to demand the following on the Arvicos' behalf:

1. The [REDACTED] demand that Jackson and his representatives (including but not limited to bodyguards, investigators, attorneys, public relations/publicity personnel, and all others who perform services for Jackson) cease all contacts and efforts to contact them.

[REDACTED]

6. None of them wants anything more to do with Jackson or his representatives. My clients insist that Jackson leave them alone from this moment on.

2. The [REDACTED] demand that Jackson immediately return to them (a) their passports and visas; (b) the papers they have signed, including passport/visa applications, school documents, documents in connection with the legal action in Britain concerning "Living With Michael Jackson," and everything else bearing their signatures

Mark J. Geragos, Esq.

March 26, 2003

Page 2

or purported signatures; (c) all personal property removed from the [REDACTED] (d) the keys to all locations and facilities in which Jackson has stored any of their possessions; (e) the children's clothing, [REDACTED]; (f) all other property or the [REDACTED] in Jackson's possession or under his control.

3. The [REDACTED] demand that Jackson immediately provide a list of all their personal property that he possesses or controls or stored, whether it was left at Neverland, removed from my clients' apartment, or obtained in any other way. They also demand to know the precise location of all such property, and the identity, address, and phone number of each person with access and/or a key to any place where the property is located.

4. The [REDACTED] demand that Jackson immediately provide the originals and all copies of all tapes, films, audio recordings, photographs, and other physical representations of any of the [REDACTED] or their voices, that were made by or on behalf of Jackson, including but not limited to (a) all "images on film" and "film images" referred to in the several purported releases dated 2/19/03 and titled "This model release"; (b) any film or tape made for "Living With Michael Jackson," including outtakes; (c) any tapes or films of one or more [REDACTED] including but not limited to recordings made by [REDACTED] including the recording made at [REDACTED]

[REDACTED] and (d) the tape or film or the [REDACTED] that was made in a home in the San Fernando Valley within the last two months, before the broadcast of the Jackson "rebuttal" of "Living With Michael Jackson."

5. The [REDACTED] demand that Jackson immediately provide (a) the originals and all copies of all purported releases signed by any of them; (b) the document that [REDACTED]

[REDACTED] and (c) [REDACTED] The [REDACTED] hereby revoke all releases they signed in favor of Jackson, [REDACTED] Accordingly, the [REDACTED] demand that Jackson not exhibit, sell, or exploit in any manner any materials, images, and any other thing that is supposedly the subject of a release signed by any of the Arvizos, including but not limited to "Living With Michael Jackson." In

Mark J. Geragos, Esq.
March 26, 2003
Page 3

view of [REDACTED]
"rebuttal" program without legal consent, he demands that Jackson
cease and desist from exploiting either of these productions in any
manner whatsoever.

[REDACTED]. His failure to heed
this demand will force my clients to seek a civil restraining order
and perhaps to vindicate their rights in other legal ways. They
expect Jackson to comply with the demands to provide items by
delivering them to my office no later than April 1, 2003. If
Michael Jackson truly is concerned about the best interests of the
[REDACTED] he will comply promptly with each of these
demands.

Sincerely yours,

William Dickerman

WD:jsp
cc: [REDACTED]

Law Offices of Dickerman & Associates

11355 W. Olympic Boulevard
Suite 100
Los Angeles, California 90064

Phone: (310) 268-6666
Fax: (310) 268-6667
Email: wdickerman@mindspring.com

April 8, 2003

by fax

Mark J. Geragos, Esq.
Geragos & Geragos
350 S. Grand Ave., 39th Floor
Los Angeles, CA 90071

Re: [REDACTED]/Jackson

Dear Mr. Geragos:

Further to our conversation this afternoon, I have spoken to my client about receiving the items you said are stored away. She tells me that, contrary to what you said about there being a "truckload," she had very few possessions since she lived in a bachelor apartment. She does not believe that much if any furniture was removed. In any event, she would like to arrange to go to the storage facility and remove whatever of her family's possessions are there. The best days are April 14 and 20-25. Please let me know ASAP what dates are available for your client.

You said that the moving transaction [REDACTED]

[REDACTED] Incidentally, she tells me [REDACTED]

[REDACTED] Obviously, therefore, you are fully aware of what has been going on between Jackson and my clients.

Regardless of when the apartment items are returned, please [REDACTED] last, to my clients' knowledge, in [REDACTED] possession.

[REDACTED] Jackson should have no doubt as to [REDACTED]

#03

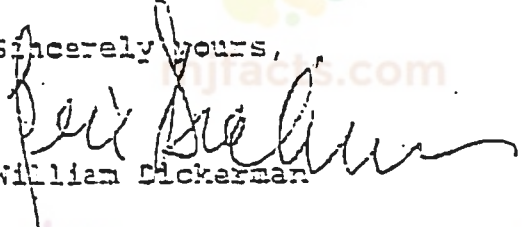
Mark J. Geragos, Esq.

April 8, 2003

Page 2

intention to do all she can to protect her children [REDACTED]
[REDACTED]
[REDACTED]

Sincerely yours,


William Dickerman

WD:jap
[REDACTED]

Law Offices of Dickerman & Associates

11555 W. Olympic Boulevard
Suite 100
Los Angeles, California 90064

Phone: (310) 268-6666
Fax: (310) 268-6667
Email: wdickerman@mindspring.com

April 3, 2003

Via Fax (213) 625-1500

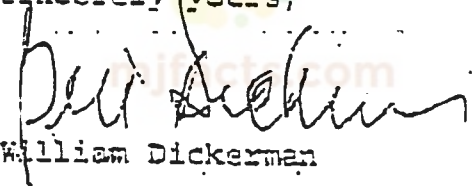
Mark J. Geragos, Esq.
Geragos & Geragos
350 S. Grand Avenue, 39th Floor
Los Angeles, CA 90071

Re: [REDACTED]/Jackson

Dear Mr. Geragos:

On March 26, 2003, I wrote you and asked that you deliver certain items to my office by April 1. On March 31, we spoke, and you asked for a couple of days' additional time to locate certain items. Would you please let me know, immediately, what progress you have made? My clients are quite eager to obtain the possessions and all other items described in my March 26 letter.

Sincerely yours,


William Dickerman

WD:js
[REDACTED]

Law Offices of Dickerman & Associates

11355 W. Olympic Boulevard
Suite 100
Los Angeles, California 90064

Phone: (310) 268-6666
Fax: (310) 268-6667
Email: wdickerman@mindspring.com

April 9, 2003

by fax

Mark J. Geragos, Esq.
Geragos & Geragos
350 S. Grand Ave., 39th Floor
Los Angeles, CA 90071

Re: [REDACTED]/Jackson

Dear Mr. Geragos:

Further to my letter of yesterday, which I faxed in the early evening, my clients request that you immediately deliver to me, [REDACTED] the following items of [REDACTED] that he had while [REDACTED] but that he did not take with him when he left: [REDACTED] Those items were not among the items stored from the [REDACTED] If those things, or any of the others that I have requested be delivered immediately, are in storage, please have them removed from storage.

I also request that you immediately provide the name, address, and phone number of the entity or individual(s) that moved the apartment items to storage.

Sincerely yours,


William Dickerman

WD:jsp

#05

mjfacts.com

mjfacts.com

mjfacts.com

April 11, 2003

Via Fax (213) 625-1600

Mark J. Geragos, Esq.
Geragos & Geragos
350 S. Grand Avenue, 39th Floor
Los Angeles, CA 90071

Re: [REDACTED]/Jackson

Dear Mr. Geragos:

I wrote you on April 9, 2003, requesting the immediate delivery of certain items. I have not received them. I followed up the letter with a phone call; you have not responded to it. Please have your client comply with my demands at once.

My clients have also learned that Mr. Jackson has produced or is producing, and that Fox will broadcast, a program involving home videos or home movies. To the extent that any such production contains footage, interviews, or anything else concerning any of my clients, I hereby demand that my clients be cut out of any such production and not be part of any such broadcast. As I stated in my March 26 letter to you, [REDACTED] "revoke[d] all releases they signed in favor of Jackson, [REDACTED]

[REDACTED] Accordingly, neither Jackson nor Fox has any of my clients' consent to exhibit any tape or film of them. As you know, once consent has been withdrawn, the use of such material will be actionable.

I would appreciate your confirming to me, at your earliest convenience, that neither Mr. Jackson nor his company will use any tape, film, or other image of my clients.

Sincerely yours,

William Dickerman

WD:is
[REDACTED]

mjfacts.com

mjfacts.com

mjfacts.com

mjfacts.com

mjfacts.com

406

GERAGOS & GERAGOS

LAWYERS

39TH FLOOR

350 S. GRAND AVENUE

LOS ANGELES, CALIFORNIA 90071-3450

TELEPHONE (213) 625-3900

FACSIMILE (213) 625-1600

April 15, 2003
VIA FACSIMILE

William Dickerman
11355 W. Olympic Blvd
Suite 100
Los Angeles, CA 90064
Facsimile No: (310) 268-6667

Re: [REDACTED]

Dear Mr. Dickerman:

We have retrieved various items from storage and would appreciate your advising us as to where they should be delivered.

Very truly yours,



Mark J. Geragos
GERAGOS & GERAGOS

MJC:gof

Law Offices of Dickerman & Associates

11355 W. Olympic Boulevard
Suite 100
Los Angeles, California 90064

Phone: (310) 268-6666
Fax: (310) 268-6667
Email: wdickerman@mindspring.com

April 22, 2003

by fax

Mark J. Geragos, Esq.
Geragos & Geragos
250 S. Grand Ave., 39th Floor
Los Angeles, CA 90071

Re: [REDACTED] Jackson.

Dear Mr. Geragos:

This responds to yours of April 15. I have been out of the office most of the time since then. On March 26 I asked you to return immediately to the Arvizos their passports, other documents, Gavin's clothing, etc. You did not do so. On April 8 I again asked that some items be delivered to me immediately. You did not do so. On April 9 I repeated the request. You ignored it, too. Your April 15 letter ignores the specific requests and refers simply to "various items." As to those referred to above, you already have my instructions for delivery. I demand, for the fourth time, that you comply with my requests.

As for any other items, I repeat my request of March 26 that "Jackson immediately provide a list of all [my clients'] personal property that he possesses or controls or stored, whether it was left at Neverland, removed from my clients' apartment, or obtained in any other way. They also demand to know the precise location of all such property, and the identity, address, and phone number of each person with access and/or a key to any place where the property is located." In order to know what to do with items other than those I have asked you repeatedly to deliver to me, my clients need to know what and where it is. They have a right to know, too.

In view of your failure to provide [REDACTED]

Sincerely yours,


William Dickerman

WD:jsp
cc: Ms. Janet Arvizo

#08

Law Offices of Dickerman & Associates

11355 W. Olympic Boulevard

Suite 100

Los Angeles, California 90064

Phone: (310) 268-6666

Fax: (310) 268-6667

Email: wdickerman@mindspring.com

May 12, 2003

by fax

Mark J. Geragos, Esq.

Geragos & Geragos

350 S. Grand Ave., 39th Floor

Los Angeles, CA 90071

Re: [REDACTED] / Jackson

Dear Mr. Geragos:

I thought I had previously memorialized by letter your April 24 stunt with the movers, but I find I did not. This, then, will serve to confirm that on April 24, at about 9:30 a.m., you sent purported movers to my office laden with a huge amount of furniture and, possibly, other items that the movers told the receptionist and building services representatives I had directed and arranged to be delivered. As you know and knew then, and as my correspondence reflected, there was no such arrangement. In fact, much to the contrary, I asked you, on numerous occasions, to deliver [REDACTED]

[REDACTED] Not only did you never deliver these items; you never even acknowledged any intention or interest in doing so. In fact, the "movers" left nothing at my premises, neither passports, clothes, furniture, nor anything else.

I'm curious what you hoped to gain by (1) trying to deliver things that I did not ask for (2) at a time that I did not arrange (3) on a day when my recorded phone message said I would be out of the office. Your representative told the building staff that I had arranged for the move, was going to be at my office to receive the items, and that it was critical to me that the move be accomplished at that precise time. That was all false, as you know and knew then.

I reiterate the demand in several previous letters that you immediately deliver the specified items to me. I would also like to know precisely what the movers sought to deliver, where it is now, and how to get hold of it if my client seeks to do so.

Sincerely yours,


William Dickerman

WD:jsp
[REDACTED]

109

Law Offices of Dickerman & Associates

11355 W. Olympic Boulevard
Suite 100
Los Angeles, California 90064

Phone: (310) 263-6666
Fax: (310) 263-6667
Email: wdickerman@mindspring.com

May 15, 2003

by fax

Mark J. Geragos, Esq.
Geragos & Geragos
350 S. Grand Ave., 39th Floor
Los Angeles, CA 90071

Re: [REDACTED]/Jackson

Dear Mr. Geragos:

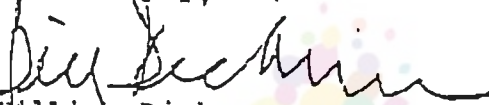
Thank you for your letter of today, which establishes nothing so much as your apparent adherence to the "Big Lie" school of thought; that is, you seem to believe that if you repeat or imply a falsehood often enough, it will be believed. In fact, as you well know, I was never "expecting delivery" of anything because (1) I never asked for it at any time, (2) we did not ever agree on any "delivery" at any time, and (3) I knew months in advance that I would be out of the office that day (the last day of Passover), so obviously would not have scheduled a "delivery" for that day. Anyone who bothered to call me would have heard my phone message announce that I would not be in; undoubtedly, you did call, and attempted the "delivery" precisely because I would not be here.

I will consider your suggested resolution once you comply with my previous requests that you provide a list of all items you intend to "deliver." I was told there was a massive amount of furniture in your "delivery," while my clients, who lived in a bachelor apartment, had very few possessions and little (if any) furniture.

[REDACTED]
[REDACTED] like you to deliver, immediately, my clients'

Finally, your blatant dishonesty regrettably compels me to instruct you to act on only my written authorization, instruction, or agreement.

Sincerely yours,


William Dickerman

WD:jsp

GERAGOS & GERAGOS

LAWYERS

25TH FLOOR

350 E. GRAND AVENUE

LOS ANGELES, CALIFORNIA 90071-3480

TELEPHONE (213) 625-3900

FACSIMILE (213) 625-1500

May 15, 2003
VIA FACSIMILE

William Dickerman
11355 W. Olympic Blvd
Suite 100
Los Angeles, CA 90064
Facsimile No: (310) 268-6667

Re: [REDACTED]

Dear Mr. Dickerman:

Thank you for your letter dated May 12, 2003, in which you correctly note that movers appeared at your office on April 24, 2003, to deliver property you claim belongs to your client. You also correctly note that "the movers left nothing at my premises." As you know, the reason nothing was left was that your landlord refused delivery of the items because you had failed to advise them that you were expecting the delivery. (See April 24, 2003 email from Salomeh Akadi to Dickerman, Bill)

Since it appears that you are not equipped nor willing to receive the property at your office, we suggest that a simple manner in which to resolve this situation is for your client to assume the \$100/month charge for the rental units in which the property is being stored.

Please advise me at your earliest convenience as to whether your client will accept this reasonable offer.

Very truly yours,



Mark J. Geragos
GERAGOS & GERAGOS

#11

GERAGOS & GERAGOS

LAWYERS

39TH FLOOR

380 S. GRAND AVENUE

LOS ANGELES, CALIFORNIA 90071-3480

TELEPHONE (213) 625-2900

FACSIMILE (213) 625-1200

May 17, 2003

VIA FACSIMILE

William Dickennan
11355 W. Olympic Blvd, Suite 100
Los Angeles, CA 90064
Facsimile No: (310) 262-6667

Re: [REDACTED]

Dear Mr. Dickennan:

Thank you for your histrionic letter dated May 15, 2003. Beyond your bluster and personal attacks, please remember that you have a duty to resolve this matter in the most efficient manner possible. In that regard, please advise us as to whether your clients will accept our offer that they assume payment on the two storage lockers.

As to your request for an inventory of the property, our offer allows your clients immediate possession of all their property, period. We will waste no further time or resources of our client. You have caused us the unnecessary expense of one delivery attempt and we will not waste additional funds for the sole purpose of placating you.

Lastly, please be advised that in the event your clients (1) refuse to assume the payments on the storage lockers, or (2) fail to promptly remove the property therein, the property may ultimately be subject to auction by the storage facility.

Govern yourself accordingly.

Very truly yours,



Mark J. Geragos

GERAGOS & GERAGOS

MJC:gof

Law Offices of Dickerman & Associates

11355 W. Olympic Boulevard
Suite 100
Los Angeles, California 90064

Phone: (310) 268-6666
Fax: (310) 263-6667
Email: wdickerman@mindspring.com

May 20, 2003

by fax

Mark J. Geragos, Esq.
Geragos & Geragos
350 S. Grand Ave., 39th Floor
Los Angeles, CA 90071

Re: [REDACTED] Jackson

Dear Mr. Geragos:

Thank you for your letter of May 17, which disingenuously characterizes my recitation of the truth as "histrionic."

My clients are willing to assume payment for storage of their possessions. In my letters of March 26 and April 22, I asked that you provide "the precise location of all such property, and the identity, address, and phone number of each person with access and/or a key to any place where the property is located." You have never responded to that more-than-reasonable request. If my clients are to "assume payment on the two storage lockers," as you requested they do, they will obviously need that information as well as any agreements that are to be assumed. I look forward to receiving all such information at once.

Sincerely yours,


William Dickerman

WD:jsp

Law Offices of Dickerman & Associates

11355 W. Olympic Boulevard
Suite 100
Los Angeles, California 90064

Phone: (310) 268-6666
Fax: (310) 268-6667
Email: wdickerman@mindspring.com

May 29, 2003

by fax

Mark J. Geragos, Esq.
Geragos & Geragos
350 S. Grand Ave., 35th Floor
Los Angeles, CA 90071

Re: [REDACTED]/Jackson

Dear Mr. Geragos:

On May 17 you demanded that I fulfill my supposed "duty to resolve this matter in the most efficient manner possible," which you defined as "advis[ing] us as to whether your clients will accept our offer that they assume payment on the two storage lockers." On May 20 I faxed back an acceptance of that offer and asked for particulars as to where the property was being stored. You have not responded, thus apparently violating the "duty" you mentioned. I request that you immediately supply the information requested in the previous letter.

Sincerely yours,


William Dickerman

WD:jsp

GERAGOS & GERAGOS

LAWYERS

SUITE FLOOR

350 S. GRAND AVENUE

LOS ANGELES, CALIFORNIA 90071-2460

TELEPHONE (213) 625-3900

FACSIMILE (213) 625-1800

June 2, 2003

VIA FACSIMILE

William Dickerman
11355 W. Olympic Blvd, Suite 100
Los Angeles, CA 90064
Facsimile No: (310) 268-6667

Re: [REDACTED]

Dear Mr. Dickerman:

Thank you for your letter dated May 29, 2003. We will forward the information related to the storage lockers. Please arrange to have your clients assume responsibility for the lockers. You should also be advised that the June rent is paid. As such, your clients have until July 1, 2003 to finalize the transfer.

Please do not hesitate to call if you have any questions.

Very truly yours,



Mark Geragos
GERAGOS & GERAGOS

Fax

To: William Dickerman

Re: [REDACTED] Belongings In Storage

Object:

Pages: 1

Fax: [REDACTED]

Date: June 12, 2003

Message

Dear Mr. Dickerman;


Sorry I was not able to get back to you yesterday; my Office Manager, Karen, let me know you called this morning...

[REDACTED] belongings were packed and loaded by [REDACTED]. They then placed the items in storage at their facility where they have remained since (occupying I believe two (2) vaults. I just sent a check to [REDACTED] for storage payment (May and June).

Please call [REDACTED] and make whatever arrangements are necessary to transfer the storage from myself to either you or your client.

[REDACTED] they can FAX whatever paperwork is necessary for me to sign to [REDACTED]

Thank you,



[REDACTED] Geragos, Esc.; Geragos & Geragos

#16

PAGE 2	SHERIFF'S DEPARTMENT	Case Number 03-5670
	Santa Barbara County	
	CONTINUATION SHEET	
(A) LIST CONTINUATION. (B) DESCRIBE. PHYSICAL EVIDENCE, LOCATION FOUND & DISPOSITION. (C) NARRATIVE. (D) DISPOSITION.		

- 1
2 A. [REDACTED]
3
4
5 B. Several pages of correspondence between [REDACTED] (William Dickerman)
6 and Jackson's attorney's (Mark Geragos & Michele Boote) were entered into
7 evidence as item # 200 under tag# 122980.
8
9 C. Narrative:
10
11 On Sunday 7-6-03 at 1500 hours Detective Zelis and I met with [REDACTED] at
12 the Santa Barbara Sheriff's Department in Goleta. During that meeting [REDACTED]
13 was interviewed regarding this case. Refer to Detective Zelis's report for further
14 concerning the results of the interview. At the conclusion of the interview [REDACTED]
15 gave us several pages of correspondence between her attorney (William
16 Dickerman) and Jackson's attorney's (Mark Geragos & Michele Boote).
17
18 The correspondence centered on [REDACTED] property that Jackson's people had put
19 into storage and the MJJ production of "Living with Michael Jackson".
20
21 D. Attention Records: Investigation continuing.
22

Memorandum

Date: November 10, 2003

To: Sgt. Steve Robel and Paul Zelis

From: Thomas W. Sneddon, Jr., District Attorney *TS*

Subject: Michael Jackson Investigation



On Saturday, November 8, 2003, at approximately 1000 hours, I arrived in Beverly Hills for the purpose of ascertaining a description of the premises located at 211 South Beverly Drive, Beverly Hills, California, which is the purported office of Brad G. Miller. I turned right off of Wilshire Boulevard onto Beverly, traveled south for a block and a half, and on the right-hand side of the street I saw a two-story brick-trimmed building with the numbers 211 directly over large wooden double doors. I parked my car and went inside of the building and found the roster of occupants posted in a glass-enclosed container. In reviewing the occupants, I found the name of Brad Miller, with the number 205 directly to the right of his name. I photographed the roster. Slightly to my rear and left was a staircase. I went up the stairs to the top and turned left and proceeded to the end of the hallway. On the last door on the left-hand side of the hallway, was a double door with the number 205 next to it. The door contained about a half a dozen names of either attorneys or business management firms. The Brad Miller or Brad G. Miller was not among those listed on the door.

Thereafter, I walked the entire second floor location looking at other office spaces for either the name Brad Miller or Brad G. Miller on the door. I found none. Some of the other doors had names of businesses on them while others were simply blank with the room number next to it. I did this twice to ensure that I was not overlooking anything. I then proceeded down Beverly until I was able to turn around and come back on Beverly heading towards Wilshire Boulevard. I stopped immediately across the street from the building and took a series of photographs of the building. I then found a nearby phone booth with a Beverly Hills Yellow Pages. In the Yellow Pages I found the name of Brad Miller. I cannot recall whether there was a "G" in the name or not. I do not believe there was any address attached to the name, but there was a telephone number of 310-550-8121.

I then proceeded to the pre-arranged meeting place at the rear of the Federal Building on Wilshire Boulevard to meet with [REDACTED]. The purpose of the meeting was to secure her signature to some applications for victims compensation, to pick up several items of evidence that she wanted turned over to investigators relevant to the investigation of Michael Jackson and to show her several photographs. The first thing I did was have [REDACTED] sign the applications.

[REDACTED]

#18

Lastly, I received from [REDACTED] and gave her a receipt to that effect, a CD disk with the writing on the front of it, "Michael Jackson and [REDACTED] and, a black jacket, which I did not examine. It was in a bag and I simply placed the disk and the jacket in the trunk of my car. Those items remained in my car until both items were moved to a secured location within my office.

07-50-1
P3.6





<input type="checkbox"/> RECLASSIFICATION <input type="checkbox"/> CLASSIFICATION		SHERIFF'S DEPARTMENT SANTA BARBARA COUNTY			2. CASE NUMBER <div style="text-align: center; font-size: 1.2em;">03-5670</div>					
3. DATE RPT / TIME Friday, 06-13-03, 1520 hrs		4. FOLLOW UP TO: <input checked="" type="checkbox"/> OFFENSE <input type="checkbox"/> ARREST <input type="checkbox"/> INCIDENT		5. DATE/TIME THIS RPT/TIME Tuesday 11-18-03, 0930 hrs						
6. VICTIM (LAST, FIRST, MI) Victim 1 Confidential		SEX	RAC	AGE/D.O.B.	RESIDENCE ADDRESS					
7. BUSINESS ADDRESS OR SCHOOL		BUS PHONE		WORK HOURS	HOME PHONE					
8. R/P <input type="checkbox"/> WIT <input type="checkbox"/> CO-VIC <input checked="" type="checkbox"/> PARENT <input type="checkbox"/> OTHER <input type="checkbox"/> LAST, FIRST, MIDDLE) CIRCLE INVOLVEMENT Victim 2 Confidential		CM	SEX	RAC	AGE/D.O.B.	RESIDENT ADDRESS	TELEPHONE			
R/P <input type="checkbox"/> WIT <input type="checkbox"/> CO-VIC <input type="checkbox"/> PARENT <input type="checkbox"/> OTHER <input checked="" type="checkbox"/> Victim 2 Confidential		CM	SEX	RAC	AGE/D.O.B.	BUS	RES			
R/P <input type="checkbox"/> WIT <input type="checkbox"/> CO-VIC <input type="checkbox"/> PARENT <input type="checkbox"/> OTHER <input checked="" type="checkbox"/> Victim 2 Confidential		CM	SEX	RAC	AGE/D.O.B.	BUS	RES			
R/P <input type="checkbox"/> WIT <input type="checkbox"/> CO-VIC <input type="checkbox"/> PARENT <input checked="" type="checkbox"/> OTHER <input type="checkbox"/> Victim 2 Confidential		CM	SEX	RAC	AGE/D.O.B.	BUS	RES			
9. SUSPECT NAME (LAST, FIRST, MIDDLE) JACKSON, MICHAEL		CM	SEX	RAC	AGE/D.O.B.	HGT	WGT	HAI	EYE	BOOKING #
ADDRESS NEVERLAND VALLEY RANCH Los Olivos		PHONE	MUSTACHE	HAT	CLOTHING DESCRIPTION					
10. SUSPECT NAME (LAST, FIRST, MIDDLE) Victim 2 Confidential		CM	SEX	RAC	AGE/D.O.B.	HGT	WGT	HAI	EYE	BOOKING #
ADDRESS Victim 2 Confidential		PHONE	MUSTACHE	HAT	CLOTHING DESCRIPTION					
11. SUSP VEH LICENSE ST YR MAKE MODEL COLOR LOCATION/PERSON		<input type="checkbox"/> STORED, RELEASED <input type="checkbox"/> IMPOUNDED								
12. REVIEWING DA <input type="checkbox"/> YES <input type="checkbox"/> MISDEMEANOR <input type="checkbox"/> NO <input type="checkbox"/> FELONY		13. <input type="checkbox"/> CITATION ISSUE <input type="checkbox"/> WARRANT ISSUED <input type="checkbox"/> O.A. NOTICE <input type="checkbox"/> IN CUSTODY <input type="checkbox"/> REF. TO PROBATION <input type="checkbox"/> OUT ON BAIL		14. <input type="checkbox"/> CLEARED <input type="checkbox"/> CLOSED <input type="checkbox"/> INACTIVE						
15. ATTACHMENTS: <input checked="" type="checkbox"/> SH-431 <input type="checkbox"/> CHP 180 <input checked="" type="checkbox"/> OTHER <input checked="" type="checkbox"/> PROPERTY TAG # 122980		PAGE 1 OF _____ PAGES								
16. RELATED CASE NUMBERS		VICTIM OR BUSINESS		DATE REPORTED		CRIME TYPE		CASE STATUS		
17. REPORTING DEPUTY BODY # DET R FORNEY #2522		18. DATE/TIME RPT WRITTEN 11-19-03/0917		19. EST. TOTAL VALUE DNA		20. TOTAL HOURS WKD 20		RECORDS USE ONLY RECEIVED 2423 DATE 11/21/04 BCS RAC		
21. ASSISTING DEPUTY BODY # DA INVESTIGATOR TONELLO		22. SUPERVISOR APPROVING BODY # SGT W. W. DOWELL #0362		23. TYPE/DATE BY/DATE 3124/11-20-03						

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Copy for: () Detectives () Juvenile () Probation () Investigator

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#71

0192

PAGE 2	SHERIFF'S DEPARTMENT	03-5670
	Santa Barbara County	
	CONTINUATION SHEET	
(A) LIST CONTINUATION. (B) DESCRIBE PHYSICAL EVIDENCE, LOCATION FOUND & DISPOSITION (C) NARRATIVE (D) DISPOSITION.		

(A) Continuations:

Roy Tinkler is a Senior Police Officer with the Beverly Hills Police Department.

[REDACTED] is a Private Investigator with an office located in Beverly Hills.

[REDACTED] is an attorney representing Bradley Miller.

[REDACTED] is a Property Manager for the property at 211 South Beverly Drive in Beverly Hills.

[REDACTED] is the Office Manager for [REDACTED]

(B) Evidence:

Item Number 811, One TDK VHS video tape marked RE: [REDACTED] 2-19/2-21.

Item Number 812, One Maxell VHS video tape marked RE: [REDACTED]

Item Number 813, One Maxell VHS video tape marked [REDACTED]

Item Number 814, One Maxell VHS video tape marked [REDACTED]

Item Number 815, One Sony VHS video tape marked [REDACTED]

Item Number 816, One Maxell VHS video tape marked [REDACTED]

Item Number 817, One TVK audio cassette tape marked [REDACTED]

PAGE 3	SHERIFF'S DEPARTMENT	03-5670
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	CONTINUATION SHEET	
(A) LIST CONTINUATION (B) DESCRIBE: PHYSICAL EVIDENCE, LOCATION FOUND & DISPOSITION (C) NARRATIVE (D) DISPOSITION		

Item Number 818, One TVK audio cassette tape marked [REDACTED] STMT 2-16-03.

Item Number 819, One TVK mini-digital video tape marked [REDACTED]

Items Number 811 through 819 were taken from the entertainment center located in the conference room in [REDACTED]

Item Number 820, one Sony VHS video tape marked Michael Jackson - Unmasked.

Item Number 821, one faxed Memo from [REDACTED]

Items Number 820 and 821 were located in [REDACTED] personal office in a plastic storage container.

[REDACTED]

Item Number 823, one hand-written billing summary listing confidential MJJ.

Items Number 822 and 823 were located on top of [REDACTED]'s desk in his personal office.

Item Number 824, one Maxtor D540X, hard drive Serial Number 674118925717. This hard drive was removed from the computer in [REDACTED]'s personal office by [REDACTED]

msc

PAGE 4	SHERIFF'S DEPARTMENT	03-5670
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	CONTINUATION SHEET	
(A) LIST CONTINUATION (B) DESCRIBE PHYSICAL EVIDENCE, LOCATION FOUND & DISPOSITION. (C) NARRATIVE. (D) DISPOSITION.		

Item Number 825, one Maxtor 4D080H4 hard drive Serial Number D402NL5EFD24A. This hard drive was removed from the computer in the receptionist's office by [REDACTED]

Item Number 826, one copy of the hard drive from the computer in the conference room of [REDACTED] office. This copy was made by [REDACTED]

All of the above items were packaged by [REDACTED] and me. Sergeant Caldwell subsequently booked all of the aforementioned items into the property room at the Goleta Main Station, as evidence.

28 digital photos were taken of [REDACTED] office prior to and after the execution of the search warrant. These photos were submitted to Forensics for downloading.

Attachment:

A sketch of the floor plan of [REDACTED] office, drawn by [REDACTED]

(C) Narrative:

On 11-18-03, at about 0700 hours, [REDACTED], [REDACTED] and I met at the Beverly Hills Police Department, in preparation to serve a Search Warrant at 211 South Beverly Drive, Number 108, in Beverly Hills.

The Search Warrant had been obtained by [REDACTED] and signed by [REDACTED], on 11-17-03.

[REDACTED] was subsequently assigned to assist us in the service of the Search Warrant at [REDACTED].

PAGE 5	SHERIFF'S DEPARTMENT	03-5670
	Santa Barbara County	
	CONTINUATION SHEET	
(A) LIST CONTINUATION (B) DESCRIBE: PHYSICAL EVIDENCE, LOCATION FOUND & DISPOSITION. (C) NARRATIVE. (D) DISPOSITION.		

1
2 On 11-18-03, at approximately 0930 hours, we served the Search Warrant at
3 [REDACTED]'s office, 211 South Beverly Drive, Number 108, in Beverly Hills.

4
5 Prior to entering the office, we knocked and announced and received no
6 response. We found the door to be locked. We were assisted by the manager of
7 the property located at 211 South Beverly Avenue, Number 108, [REDACTED]
8 [REDACTED] used a key to open the outer door to the office to allow us to gain entry.

9
10 Once inside the office, we found there were two locked offices. One of the
11 offices was [REDACTED]'s personal office, the other was the conference room.
12 [REDACTED] said she had no way to access those two rooms, as they were
13 locked. We made several attempts to telephone Bradley Miller at this time, but
14 we were unsuccessful. [REDACTED] left the office.

15
16 I subsequently used a sledge hammer to force open [REDACTED]'s personal
17 office. [REDACTED] used the sledge hammer to gain entry to the
18 conference room.

19
20 Once inside the conference room, I located the aforementioned video and audio
21 tapes on a shelf in the entertainment center. I seized these items and they were
22 packaged by [REDACTED]

23
24 Upon searching [REDACTED]'s personal office, I located the video, Item Number
25 820, and the Fax Memo, Number 821, [REDACTED] and the
26 Billing Summary, Number 823. I delivered these items to [REDACTED] who
27 packaged them.

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	CONTINUATION SHEET	
(A) LIST CONTINUATION. (B) DESCRIBE: PHYSICAL EVIDENCE, LOCATION FOUND & DISPOSITION (C) NARRATIVE. (D) DISPOSITION.		

1 While I was conducting a search of the office, [REDACTED] removed the hard
2 drives from the aforementioned computers and attempted to copy them. He was
3 able to copy the hard drive from the conference room, however, he was not able
4 to do so on the hard drives from the computers from the receptionist office and
5 from [REDACTED]. Therefore, he seized these two hard drives, which I
6 subsequently packaged. Investigator [REDACTED] retained the hard drives (Items
7 #824, #825 and #826) and, later, met with [REDACTED] with these items, at the
8 Sheriff's Department property room, where he turned them over to [REDACTED].

9
10 At approximately 1015 hours, [REDACTED] called [REDACTED] who
11 stated he would be enroute to his office, with his attorney. mjfacts.com

12
13 At approximately 1140 hours, [REDACTED] the office manager for [REDACTED]
14 [REDACTED] arrived at the door of the office and requested admittance. [REDACTED] was
15 denied entrance by [REDACTED]. She stated that [REDACTED] would be
16 arriving at the office at approximately 1230 hours.

17 mjfacts.com
18 At approximately 1200 hours, [REDACTED] arrived at his office.

19
20 At approximately 1205, on 11-18-03, [REDACTED] attorney [REDACTED]
21 arrived at the office.

22
23 [REDACTED] and I continued our search and
24 completed it at approximately 1305 hours. mjfacts.com

25
26 Prior to leaving the office, I asked [REDACTED] if he wished to answer some
27 questions regarding his association with Michael Jackson and our Search

PAGE 7	SHERIFF'S DEPARTMENT	03-5670
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	CONTINUATION SHEET	
(A) LIST CONTINUATION. (B) DESCRIBE PHYSICAL EVIDENCE, LOCATION FOUND & DISPOSITION. (C) NARRATIVE. (D) DISPOSITION.		

1 Warrant. [REDACTED], stated that his client, [REDACTED] would not answer
2 any questions.

3
4 During the search of [REDACTED] we located a bill, indicating that Bradley Miller
5 had a storage space rental at the Westwood Self-Storage, 1901 South
6 Sepulveda Boulevard in West Los Angeles, Unit C239. This information was
7 provided to Sergeant Steve Robel and a Search Warrant was subsequently
8 obtained for the storage unit. Refer to the Follow-Up Report regarding the
9 service of the Search Warrant at that location.

10
11 (D) Attention Records:

12 Investigation continuing. FOL

1. Office of Classification
#108
0211 So. Beverly Ave., Beverly Hills

SHERIFF'S DEPARTMENT
SANTA BARBARA COUNTY
PROPERTY FORM

PAGE # 1 of 2
03-5670
2. Case Number
3. Attachments to Report
YES ☐ NO ☐

4. Victim's Description	5. Reporting Officer & Body No.	6. Date & Time of Report	7. Circumstances of Type of Report	8. Property Type Code	9. Found or Recovered	10. LOST	11. UNDER OBSERVATION
9. Item No.	10. Description	11. Serial No.	12. Brand/Model	13. Unretrieved Property	14. Inventory Type Code	15. Value	16. Evidence Tag No.
811	Video	Ø	KDE VHS T-120	Video Re: [REDACTED]	E	Ø	132980
812	Video	Ø	MAXELL VHS T-120	Re: [REDACTED]	E	Ø	"
813	"	Ø	MAXELL VHS T-120	JACKSON	E	Ø	"
814	"	Ø	MAXELL VHS T-120	JACKSON	E	Ø	"
815	"	Ø	Sony VHS T-120	MOBILE 03-0503 NY	E	Ø	"
816	"	Ø	MAXELL VHS T-120	NYT	E	Ø	"
817	Video	Ø	TKE CASSETTE	NYTEL	E	Ø	"
818	Video	Ø	TKE CASSETTE	Michael Jackson	E	Ø	"
819	Video	Ø	TKE Video	[REDACTED]	E	Ø	"
	Items #818 taken from conference/Video						
820	Video	Ø	Sony VHS T-120	Michael Jackson - NYTEL	E	Ø	"
821	Video	Ø	TO GEORGES/MATTHEW	MATTHEW JACKSON	E	Ø	"
	Item #820 & #821 taken from Miller office						
	Plastic Storage Container						
822	Check Stub 6889		[REDACTED]		Ø	Ø	"
823	Shuttle Summary		CONFIDENTIAL "HVS"		E	Ø	"
	Item #822 & #823 taken from top of						
	MILLER'S OFFICE						

This report is for the use of the Sheriff's Department only and is not to be distributed outside the Department. It is the property of the Sheriff's Department and is to be returned upon request. If it is not returned, it will be considered lost. The Sheriff's Department is not responsible for the loss of this report. The Sheriff's Department is not responsible for the loss of this report. The Sheriff's Department is not responsible for the loss of this report.

EXCEPTIONAL IN SOLUTION IS AUTHORIZED

Entered: [] TT

#22

1. Officer or Classification

SEARCH WARRANT

211 So. Beverly Dr. #108 Beverly Hills, CALIF

SHERIFF'S DEPARTMENT
SANTA BARBARA COUNTY
PROPERTY FORM

2. Case Number

03-50770

3. Attachments

1 to 1000
VIS ☐ 110 ☐

4. Written Description

1. Movable & Office & Light Fix
2. Other

6. Date & Time of Report

7. Qualification of Officer

8. Property Type

10. Item

11. Serial No.

12. Description

13. Location

14. Item

15. Value

16. Evidence Tag

324 THE DRIVE UNIT

MAXOR DESOX

LOUFTER THE DRIVE

E

01

173980

(SEIZED FROM MILLER'S OFFICE)

324 THE DRIVE UNIT

LOUFTER THE DRIVE

E

01

173980

(SEIZED FROM RECEIPTS OFFICE)

324 THE DRIVE UNIT

E

01

173980

This copy is for the
owner of the property
and is not to be used
for any other purpose
except as a receipt for
the property.

EXCUTIONAL DUTY
SECTION IS AUTHORIZED

Filed ☐ TT ☐

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U. S. DEPARTMENT OF THE ARMY

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() Inca

34

0160

PAGE 2

SHERIFF'S DEPARTMENT

Santa Barbara County

CONTINUATION SHEET

Case Number

03-5670

(A) LIST CONTINUATION. (B) DESCRIBE: PHYSICAL EVIDENCE, LOCATION FOUND & DISPOSITION. (C) NARRATIVE. (D) DISPOSITION.

(A) Attachment:

- Two (2) page Memorandum report including two (2) pages of pictures made by Thomas W. Sneddon, Jr., District Attorney.

(B) Evidence:

I received from Sneddon, a DVD-R with writing on the front of it, "Michael Jackson and [REDACTED] and a black wool jacket, "Xavier Delcour" brand. I also received a series of Department of Motor Vehicles photograph printouts along with two blank pieces of paper used to block personal information on the printouts. I later booked these items into Sheriff's evidence under tag number 122980. Refer to SH-451 form for item designation.

(C) Narrative:

On Wednesday, November 12, 2003, at about 0830 hours, Sgt. S. Robel and I met with Thomas Sneddon at his office. Mr. Sneddon advised that he had met with [REDACTED] and had received the above mentioned items from her. He provided me the items and also provided a written memorandum report describing his contact [REDACTED] (Refer to attachment).

(D) Disposition:

Attn. Records: Continuing investigation.

SHERIFF'S DEPARTMENT

SANTA BARBARA COUNTY
PROPERTY FORM

1. OFFENSE/CLASSIFICATION
20B (a) PG - Sex
offense or lewd act
against child.

2. CASE NUMBER
03-5670

2a. attach
to report
Yes

4. VICTIM/COMPLAINANT
CONFIDENTIAL

5. REPORTING OFFICER & BODY #
Det. P. Zelis / 2667

6. DATE/TIME OF REPORT
11-12-03 / 0830

PAGE #Rtop-1 OF Prop-1
7. CONT. TO: TYPE OF RPT FORM
Offense

8. PROPERTY TYPE CODE, IF RECOVERED, STORED, IF
FORNAIL-LOST, EVIDENCE, OR UNDER OBSERVATION

ITEM #	QUANTITY	11. SERIAL NUMBER	12. BRAND/NAME	13. DESCRIPTION/PROPERTY	14. PROPERTY TYPE CODE	15. VALUE	16. EVIDENCE TAG NO.
122	DVD-R	None	Apple	DVD containing short film of Michael Jackson and [REDACTED] At Neverland, dated 9/6/2000	E	0	122980
123	Jacket	None	Xavier Delcour	Black colored wool jacket, size 48 Medium.	E	Unk.	122980
124	DMV printouts	None	DMV	Four DMV printouts including pictures of [REDACTED] Includes two blank cutout papers to cover personal information.	E	0	122980

EXCEPTIONAL DISTRIBUTION IS AUTHORIZED

TO: BY:

ENTERED
INDEXED

11/15/03

YES

EVIDENCE RECEIVED BY SHERIFF'S DEPARTMENT

NO

0162

THOMAS W. SNEDDON, JR.
District Attorney

MARNIE B. PINSKER
Assistant Director

DAVID M. SAUNDERS
Chief Investigator



PATRICK J. MCINLEY
Assistant District Attorney

CHRISTIE STANLEY
Assistant District Attorney

ERIC A. HANSON
Chief Trial Deputy

COUNTY OF SANTA BARBARA
DISTRICT ATTORNEY

August 12, 2004

Robert Sanger, Esq.
Sanger & Swysen, Lawyers
233 East Carrillo Street, Suite C
Santa Barbara, CA 93001

Re: Discovery Compliance

Dear Bob:

On Tuesday, August 10, 2004, we were advised of the fact that there was an operational plan written in conjunction with the search warrant on Neverland Ranch in November of 2003. Accordingly, please find attached to this letter discovery of that operational plan as pages 003499 through 003509.

Very truly yours,

Thomas W. Sneddon, Jr.
District Attorney

Robert Sanger, Esq. is in receipt of the discovery items listed above.

Date: 8/12/04

ROBERT M. SANGER

By: Genevieve I. Jones
Genevieve I. Jones

TWJ:ra
Attachments

cc: Steve Cochran, Esq.
Thomas A. McInley, Jr., Esq.
R. Brian Oxman, Esq.
Sara C. Yu, Esq.

☐ Santa Barbara Office
1112 Santa Barbara Street
Santa Barbara, CA 93101
(805) 568-2300
FAX (805) 568-2453

☐ Lompoc Office
115 Civic Center Plaza
Lompoc, CA 93430
(805) 737-7760
FAX (805) 737-7712

☐ Santa Maria Office
312-D East Cook Street
Santa Maria, CA 93454
(805) 346-7540
FAX (805) 346-7554

#35

Santa Barbara County Sheriff's Department
Criminal Investigations Division
Operations Plan

Date: November 14, 2003

To: All Concerned Personnel

From: Sgt. Eric Koomians

Subject: Search Warrant - Michael Jackson's Neverland Ranch

CASE SUMMARY

On June 13, 2003, CID re-opened a previous investigation regarding allegations of child abuse against Michael Jackson, as a result of a phone call from a Los Angeles attorney representing the victim and family.

[REDACTED]

CID detectives interviewed [REDACTED]

[REDACTED]

To further corroborate these allegations, a search warrant was obtained from Superior Court Judge (name). Refer to the search warrant, Attachment A, for a complete list of items/evidence sought during the search.

LOCATION

The Neverland Ranch, owned by Michael Jackson, has a physical address of [REDACTED] Los Olivos. The ranch can be located [REDACTED] Thomas Guide. The ranch is approx. 2544 acres in size. The main outer gate is located [REDACTED] and staffed with Jackson's security personnel. There is also an interior gate, staffed with security personnel, just prior to reaching the main grounds. There are a number of buildings and structures, including the main house (12,500 sq ft), guest house (2,800 sq ft), separate garage (2,895 sq ft), movie theatre (5,550 sq ft),

003499

H35

CA

arcade, security shed, large warehouse, 2 barns, amusement park rides, small zoo, etc., on the property. The main house has several hidden rooms with secret doors.

BRIEFING

The operation will occur on Tuesday, Nov 12, 2003. A pre-operation briefing will be held at 0600 hours at the Solvang Vets Hall. During the briefing, Sgt. Rebel will provide personnel with a summary of the case and what evidence will be searched for at the Neverland Ranch. Once Sgt. Rebel has completed his summary of the case, Sgt. Koopmans will instruct personnel on how the operation will be carried out, including assignments for each detective/deputy, required gear and equipment, communication protocol, etc. Aerial photographs and maps of the Neverland Ranch will be displayed at the briefing to aid personnel in familiarizing themselves with the location.

STAGING AREA

Once briefing is completed, all personnel will drive to Nojocui Avenue, Los Olivos, and park on the shoulder next to the open field, opposite to the church. The caravan will wait for notification to proceed to Neverland Ranch.

EXECUTION

Lt. Klapakis, Sgt. Rebel and Det. Zelis, along with a marked patrol unit with uniformed deputies, will proceed to the main gate and contact the guard. The guard will be advised of the reason for our presence (search warrant) and ordered out of the guard shack without making radio or phone notification to any other security staff. The guard will be detained by a second marked patrol unit with uniformed deputies.

Lt. Klapakis, Sgt. Rebel and Det. Zelis, along with the first marked unit and an additional marked unit (both backup units), will proceed onto the property and up to the main area. Confronting security/management personnel will be advised of the search warrant and provided a copy. Head of security/management will be ordered to radio their patrolling security personnel to stand down and allow SBSO personnel to move freely on the property. The main house, security shed and arcade will be immediately secured by uniformed personnel. The remainder of personnel (waiting in Los Olivos) will then enter the property.



003400

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COMMUNICATION

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All communication for this operation will be done by cell phone (Nextels) to prolong detection by Jackson's security, media and public. Personnel will not use their radios unless there is an emergency. A cell phone list for all participating personnel will be provided at briefing. Freq. 7 will be used if radio communication is necessary.

SERVICE OF WARRANT

Sgt. Robel and Det. Zalis will serve a copy of the search warrant to Jackson (if present). The main house will be searched by assigned personnel. Any of Jackson's friends or staff found in the house will have the choice to leave after being interviewed or remain in the main living room area. If Jackson is present, Lt. Klapakis, Sgt. Robel and Det. Zalis will contact him.

Forensics personnel will videotape the entire residence (interior) prior to beginning the search. The pre-determined scribe will set up in one of the rooms. Each item seized as evidence will be first photographed by Forensics personnel in the location the item is found. After a photo is taken, the finder will turn over the item to the scribe. The scribe will record/document the item on SF-451 property form, then package and seal the item into an evidence bag. Forensics personnel will again videotape the entire residence upon completion of the search. The search of the security shed, arcade and wine cellar will be processed by separate teams and in the same manner as the main house. All evidence will be booked in the Santa Barbara Property Room.

VIDEOTAPING THE OPERATION

Chris O'Leary will be assigned to videotape the service of the warrant, from the initial contact at the main gate to contacting head of security/management and/or Mr. Jackson. This will be done to protect the department from any false accusations.

COMPUTER EQUIPMENT

Detectives John McCannica and Perry Kuhl (High Tech Crimes Unit) will handle all computer equipment after photographed by Forensics personnel.

CLOTHING, GEAR & EQUIPMENT

CD/SOD detectives will wear standard search warrant clothing (ID jacket, jeans, tennis shoes, etc.). Individual equipment will consist of vests, nylon gear, radios, cell phones, S/W kits, flashlights, etc. Detectives assigned as interviewers will have tape recorders & power microphones. All interviews will be recorded.

Deputies assigned to Security Detail will wear class D uniforms. Security Detail will need 4 marked patrol units, with at least one being four-wheel-drive.

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Operations equipment will include laptop cameras and portable printers (for scribes), the Santa Maria Station Rural Crime P/U truck and the Santa Barbara Property van (for seized evidence transportation), two C/P/Mobile Dispatch vans (one for On-Site C/P, and the other for Off-Site/Logistics), portable potty units, supply of extra batteries for flashlights, tape recorders, power mics, etc., large supply of evidence bags and packaging materials. Nextels will be assigned to key positions.

MEDIA RELEASES

All media contact and information releases will be handled strictly by Cmdr. Bill Byrne and Sgt. Chris Pappas. Cmdr. Byrne and Sgt. Pappas will be on scene due to the anticipation of the operation being a major media event. Cmdr. Byrne and Sgt. Pappas will consult with CID staff prior to any news releases. A press conference in Santa Barbara will be conducted on the day after the search.

COMMAND POST

It is anticipated that our presence at the Neverland Ranch will last late into the evening. Therefore, a Command Post will be established on-site, utilizing one of the C/P/Mobile Dispatch vans. Commander Donnelly will be the Incident Commander. Lt. Kitzmann will be the Operations Lieutenant. Sgt. Koopmans will assist Lt. Kitzmann. Coffee, soda, water and snacks will be available at the Command Post.

PERSONNEL

The operation will be carried out by members from CID, SOD, ADMIN, NCOD and SCOD. DA Investigators will also be assisting. Refer to the attached personnel roster for a complete list. Two CRP units will be assigned to handle any traffic issues on Figueroa Mountain Road. CRP will handle any disruptions in traffic caused by the media or public. An ambulance will be on stand-by in the immediate area during the initial service of the warrant, since Jackson's security personnel are likely armed. Once the location is secure, the ambulance will be released.

INTERVIEWS

CID detectives and DA investigators will be assigned to interview potential witnesses on scene. These detectives also may have to respond to off-site locations for Jackson's employees, who are off-duty on the day of the search. Interviews will be assigned by Sgt. Rebel. A list of potential questions will be provided to interviewers.

OFF-SITE / LOGISTICS

An Off-site/Logistics Unit will be set up next to Maria's Tavern in Los Olivos, utilizing a second C/P/Mobile Dispatch van. The unit will be staffed by Lt. Reinstadler (unit supervisor), Sgt. Clinton (logistics support) and two deputies (runners). The unit will be

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responsible for meals, equipment and additional supplies. The unit will also be the staging area for the PIO and the liaison for CHP and AKR.

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Santa Barbara County Sheriff's Department
Criminal Investigations Division
Operations Plan

Date: November 14, 2005

To: All Concerned Personnel

From: Sgt. Eric Koopmans

Subject: Search Warrant - Michael Jackson's Neverland Ranch

CASE SUMMARY

On June 13, 2003, CID re-opened a previous investigation regarding allegations of child abuse against Michael Jackson, as a result of a phone call from a Los Angeles attorney representing the victim and family.

CID detectives interviewed [REDACTED]

To further corroborate these allegations, a search warrant was obtained from Superior Court Judge (name). Refer to the search warrant, Attachment A, for a complete list of items/evidence sought during the search.

LOCATION

The Neverland Ranch, owned by Michael Jackson, has a physical address of [REDACTED] Los Olivos. The ranch can be located [REDACTED] Thomas Guide. The ranch is approx. 2544 acres in size. The main outer gate is located [REDACTED] and staffed with Jackson's security personnel. There is also an interior gate, staffed with security personnel, just prior to reaching the main grounds. There are a number of buildings and structures, including the main house (12,500 sq ft), guest house (2,800 sq ft), separate garage (2,895 sq ft), movie theatre (5,550 sq ft),

arcade, security shed, large warehouse, 2 barns, amusement park rides, small zoo, etc., on the property. The main house has several hidden rooms with secret doors.

BRIEFING

The operation will occur on Tuesday, Nov 18, 2003. A pre-operation briefing will be held at 0600 hours at the Solvang Vets Hall. During the briefing, Sgt. Rebel will provide personnel with a summary of the case and what evidence will be searched for at the Neverland Ranch. Once Sgt. Rebel has completed his summary of the case, Sgt. Koopmans will instruct personnel on how the operation will be carried out, including assignments for each detective/deputy, required gear and equipment, communication protocol, etc. Aerial photographs and maps of the Neverland Ranch will be displayed at the briefing to aid personnel in familiarizing themselves with the location.


STAGING AREA

Once briefing is completed, all personnel will drive to Nojocui Avenue, Los Olivos, and park on the shoulder next to the open field, opposite to the church. The caravan will wait for notification to proceed to Neverland Ranch.

EXECUTION

Lt. Klepakis, Sgt. Rebel and Det. Zelis, along with a marked patrol unit with uniformed deputies, will proceed to the main gate and contact the guard. The guard will be advised of the reason for our presence (search warrant) and ordered out of the guard shack without making radio or phone notification to any other security staff. The guard will be detained by a second marked patrol unit with uniformed deputies.

Lt. Klepakis, Sgt. Rebel and Det. Zelis, along with the first marked unit and an additional marked unit (both backup units), will proceed onto the property and up to the main area. Confronting security/management personnel will be advised of the search warrant and provided a copy. Head of security/management will be ordered to radio their patrolling security personnel to stand down and allow SBSO personnel to move freely on the property. The main house, security shed and arcade will be immediately secured by uniformed personnel. The remainder of personnel (waiting in Los Olivos) will then enter the property.



COMMUNICATION

All communication for this operation will be done by cell phone (Nextels) to prolong detection by Jackson's security, media and public. Personnel will not use their radios unless there is an emergency. A cell phone list for all participating personnel will be provided at briefing. Freq. 7 will be used if radio communication is necessary.

SERVICE OF WARRANT

Sgt. Robel and Det. Zelis will serve a copy of the search warrant to Jackson (if present). The main house will be searched by assigned personnel. Any of Jackson's friends or staff found in the house will have the choice to leave after being interviewed or remain in the main living room area. If Jackson is present, Lt. Klapakis, Sgt. Robel and Det. Zelis will contact him.

Forensics personnel will videotape the entire residence (interior) prior to beginning the search. The pre-determined scribe will set up in one of the rooms. Each item seized as evidence will be first photographed by Forensics personnel in the location the item is found. After a photo is taken, the finder will turn over the item to the scribe. The scribe will record/document the item on SH-451 property form, then package and seal the item into an evidence bag. Forensics personnel will again videotape the entire residence upon completion of the search. The search of the security shed, arcade and wine cellar will be processed by separate teams and in the same manner as the main house. All evidence will be booked in the Santa Barbara Property Room.

VIDEOTAPING THE OPERATION

Chris O'Leary will be assigned to videotape the service of the warrant, from the initial contact at the main gate to connecting head of security/management and/or Mr. Jackson. This will be done to protect the department from any false accusations.

COMPUTER EQUIPMENT

Detectives John McCammon and Perry Kuhl (High Tech Crimes Unit) will handle all computer equipment after photographed by Forensics personnel.

CLOTHING, GEAR & EQUIPMENT

CID/SOD detectives will wear standard search warrant clothing (ID jacket, jeans, tennis shoes, etc.). Individual equipment will consist of vests, nylon gear, radios, cell phones, S/W kits, flashlights, etc. Detectives assigned as interviewers will have tape recorders & power microphones. All interviews will be recorded.

Deputies assigned to Security Detail will wear class D uniforms. Security Detail will need 4 marked patrol units, with at least one being four-wheel-drive.

Operations equipment will include laptop computers and portable printers (for scribes), the Santa Maria Station Rural Crime P/U truck and the Santa Barbara Property van (for seized evidence transportation), two C.P./Mobile Dispatch vans (one for On-Site C.P., and the other for Off-Site/Logistics), portable potry units, supply of extra batteries for flashlights, tape recorders, power mics, etc., large supply of evidence bags and packaging materials. Nextels will be assigned to key positions.

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COMMAND POST

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PERSONNEL

The operation will be carried out by members from CID, SOD, ADMIN, NCOD and SCOD. DA Investigators will also be assisting. Refer to the attached personnel roster for a complete list. Two CHP units will be assigned to handle any traffic issues on Figueroa Mountain Road. CHP will handle any disruptions in traffic caused by the media or public. An ambulance will be on standby in the immediate area during the initial service of the warrant, since Jackson's security personnel are likely armed. Once the location is secure, the ambulance will be released.

INTERVIEWS

CID detectives and DA investigators will be assigned to interview potential witnesses on scene. These detectives also may have to respond to off-site locations for Jackson's employees, who are off-duty on the day of the search. Interviews will be assigned by Sgt. Rebel. A list of potential questions will be provided to interviewers.

OFF-SITE / LOGISTICS

An Off-site/Logistics Unit will be set up next to Manel's Tavern in Los Olivos, utilizing a second C.P./Mobile Dispatch van. The unit will be staffed by Lt. Reinhardt (unit supervisor), Sgt. Cinturon (logistics support) and two deputies (runners). The unit will be

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**SUPERIOR COURT OF CALIFORNIA
COUNTY OF SANTA BARBARA
SANTA MARIA CIVIL DIVISION
312 E. COOK STREET
SANTA MARIA, CA 93454**

(805) 346-7414 Phone
(805) 346-7591 Fax (Criminal/Traffic)
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**SUPERIOR COURT OF CALIFORNIA
COUNTY OF SANTA BARBARA
SANTA MARIA CIVIL DIVISION**

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SANTA MARIA, CA 93454**

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(805) 346-7616 Fax (Admin/Civil/Small Claims)**

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 13 Tel: (562) 921-5058; Fax: (562) 921-2298

14 Attorneys for Defendant
 MICHAEL JOE JACKSON

16 SUPERIOR COURT OF THE STATE OF CALIFORNIA

17 FOR THE COUNTY OF SANTA BARBARA

18 SANTA MARIA DIVISION

19 THE PEOPLE OF THE STATE OF
 20 CALIFORNIA,

21 Plaintiff,

22 vs.

23 MICHAEL JOE JACKSON

24 Defendant.

CASE NO. 1133603

THOMAS A. MESEREAU, JR.'S REQUEST
 TO MAKE A PUBLIC STATEMENT

FILED UNDER SEAL & BY FAX

HEARING:

DATE: SEPTEMBER 21, 2004

TIME: 9:30 A.M.

Place: Dept. SM-2

FILED
 SUPERIOR COURT OF CALIFORNIA
 COUNTY OF SANTA BARBARA

SEP 21 2004

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

* unsealed
 pursuant to
 6/16/05 Court's
 order

1 On behalf of Mr. Michael J. Jackson ("Mr. Jackson"), lead counsel, Thomas A.
 2 Mesereau, Jr., respectfully requests that the Court permit him to make a public statement,
 3 which is attached hereto as Exhibit A. This statement has been prepared so as to avoid
 4 issues of concern in this criminal matter.

5 The defense learned yesterday that false and inflammatory story is circulating
 6 throughout the media regarding photographs allegedly seized from Mr. Jackson's
 7 residence. True and correct copies of KFI News and Celebrity Justice articles circulating
 8 on the Internet are collectively attached hereto as Exhibit B.¹

9 These articles are designed to spread falsehoods about Mr. Jackson and the
 10 evidence in this case. They are highly prejudicial to Mr. Jackson because they inflame the
 11 public and poison the jury pool. Accordingly, Mr. Mesereau respectfully requests the
 12 Court to permit him to respond to these falsehoods. The attached proposed statement is
 13 short, concise and consistent with the spirit and letter of this
 14 Court's Protective Order.

15 DATED: September 21, 2004

Respectfully submitted,

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

18 Steve Cochran
 19 Stacey McGee Knight
 KATTEN MUCHIN ZAVIS ROSENMAN

20 Robert M. Sanger
 SANGER & SWYSEN

21 Brian Oxman
 22 OXMAN & JAROSCAK

23 By:

24 *Thomas A. Mesereau, Jr.*
 Thomas A. Mesereau, Jr.
 25 Attorneys for Mr. MICHAEL J. JACKSON
 26

27 ¹ A proposed Redacted version of Mr. Mesereau's Request to Make a Public statement is
 28 concurrently filed herewith. The only portions being redacted are references to and articles by KFI
 News and Celebrity Justice. These portions are redacted because they are highly inflammatory
 and prejudicial to Mr. Jackson.

STATEMENT OF ATTORNEY THOMAS A. MESEREAU, JR.
LEAD COUNSEL TO MR. MICHAEL JACKSON

The Michael Jackson defense team has learned that information is circulating throughout the media regarding alleged photographs supposedly seized from Mr. Jackson's residence. That information is false. The prosecution has confirmed that it is false and that there are no such photographs.

We demand an immediate retraction from any news or media organization that made such an announcement. Journalistic integrity is an important factor in all reporting. This kind of reporting is irresponsible. Mr. Jackson, like all other people in America, is entitled to a fair trial. This case will be fought in the courtroom, not in the media. Mr. Jackson is innocent and will be vindicated.

EXHIBIT A

<http://kfi640.com/ericleonard.html>

September 18, 2004

XXXX MICHAEL JACKSON MOLESTATION CASE XXXX

JACKSON LAWYERS FIGHTING TO KEEP PICTURES OF NUDE BOYS OUT OF TRIAL

By Eric Leonard
KFI NEWS

Michael Jackson's defense team has been using virtually every legal strategy imaginable to stop prosecutors from using evidence seized at the singer's Neverland Ranch, including a half-dozen photos that include images of naked boys, KFI NEWS has confirmed exclusively.

One of the pictures shows a young boy about 10 or 12 years old, nude, lying face down in a bathtub, the sources said.

The water is just above, "the boy's butt cheeks," one source explained. The boy in the photo is looking back at the camera, and one source told KFI NEWS it's believed the picture was taken in Jackson's bathroom.

Another image shows a boy, about the same age, lying face down on what appears to be Jackson's bed, one of the sources said.

The boy is naked, except for a pair of, "little underwear," said one source, pulled down around the boy's feet.

Both sources said the boy in the second picture was either asleep or passed out, and said it was unclear if the boys in the pictures were the same person.

Other images apparently include a picture of a boy in another part of a bathroom, and are, "pretty disturbing," according to one of the sources.

None of the boys in the pictures were immediately identified, and it appeared none of them were involved in either the 1993 or 2003 molestation investigations, another source confirmed late Saturday.

The pictures were identified for the first time Friday by Santa Barbara deputy district attorney Ronald Zonen during a lengthy evidence hearing initiated by Jackson's defense team.

There are, "6 photographs," of young men, Zonen told Santa Barbara Superior Court Judge Rodney S. Melville. "It's very apparent why we seized them," he said, and offered to provide more detailed explanation if needed.

The photos are among some 60 pieces of evidence Jackson's lawyers have asked the judge to exclude from the upcoming molestation trial, set to begin Jan. 31, 2005.

Zonen said most of the disputed evidence involves records of visitors to the Neverland property.

Those documents could provide leads needed to identify the boys in the photographs.

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EXHIBIT B

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<http://celebrityjustice.warnerbros.com/news/0409/20b.html>

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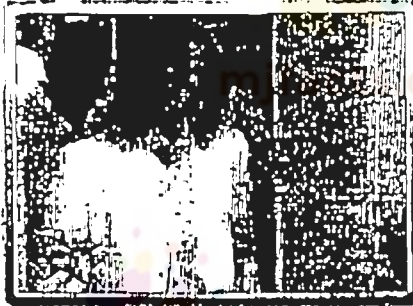
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Celebrity Justice

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Jackson Mattress and Magazines

Tested

September 20, 2004

"CJ" has learned that Santa Barbara authorities are in the middle of conducting a variety of scientific tests to help prove that Michael Jackson molested his young accuser. Sources tell us they include DNA testing as well as a fingerprint analysis. We're told prosecutors believe the results will show that Jackson placed his accuser in compromising positions.

We know authorities seized Jackson's mattress, where some of the alleged molestation occurred, so the DNA testing is self-explanatory, but what about the fingerprinting?

"There is evidence, that police seized, that they believe shows that Michael Jackson did bad things to this boy," reports "CJ's" Executive Producer Harvey Levin. He says investigators also seized pornographic magazines at Neverland Ranch. Prosecutors may try to prove that Jackson showed the racy images to the boy.

"Multiple sources connected with the prosecution in this case tell us they believe that Michael Jackson seduced this boy, aroused him by showing him pictures of naked women in magazines," reports Levin. "If these magazines were seized at Neverland, in an area not accessible to the boy, and if this boy's fingerprints show up on the magazines, that could be powerful proof at trial."

Meanwhile, other photos seized at Neverland may also prove to be explosive come trial time. On Friday, prosecutors told the judge they have six photographs of young men seized at Neverland. One reportedly shows a boy nude and lying face down in a bathtub. Another shows a boy lying in Jackson's bed, with the boy's underwear pulled down around the boy's feet.

But "CJ" has been told there may be an innocent explanation for the pictures, and that the reports surrounding them are "totally inaccurate."

TOP STORIES

Paris' Illegal Wedding
Jackson Mattress
Tested
Furlong Busted in
Liberation
Family Showdown
Seeing Red Over
George Michael's

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EXHIBIT B

2/2

PROOF OF SERVICE

I, the undersigned, declare:

I am a citizen of the United States of America, am over the age of eighteen (18) years, and not a party to the within action. I am employed at 1875 Century Park East, 7th Floor, Los Angeles, CA 90067. On August 13, 2004, I served the following document:

THOMAS A. MESEREAU, JR.'S REQUEST TO MAKE A PUBLIC STATEMENT

on the interested parties addressed as follows:

Thomas Sneddon, Esq., District Attorney
Gerald Franklin, Esq.
Ronald Zonen, Esq.
Gordon Auchincloss, Esq.
District Attorney's Office
1105 Santa Barbara Street
Santa Barbara, CA 93108
FAX: (805) 568-2398

BY MAIL: I placed each envelope, containing the foregoing document, with postage fully prepaid, in the United States mail at Los Angeles, California. I am readily familiar with the business practice for collection and processing of mail in this office; that in the ordinary course of business said document would be deposited with the US Postal Service in Los Angeles on that same day.

X BY FACSIMILE: I served a copy of the within document on the above-interested parties, by way of a facsimile, at the facsimile numbers listed above.

BY MESSENGER/ATTORNEY SERVICE: I caused _____ to personally serve the within document on the above interested parties.

X (State) I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

_____(Federal) I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

Executed on September 21, 2004, at Los Angeles, California.


Susan C. Yu