

FILED
SUPERIOR COURT of CALIFORNIA
COUNTY of SANTA BARBARA

NOV 15 2004

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

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

THE PEOPLE OF THE STATE OF
CALIFORNIA,

Plaintiff.

vs.

MICHAEL JACKSON,

Defendant.

Case No.: 1133603

Order for Release of Redacted Documents

[Exhibits 20, 21, 22, 34, 35, 36, 44 and 51
from Pen. C. § 1538.5 Hearings (Parts 1 and
2)]

The redacted versions of Exhibits 20, 21, 22, 34, 35, 36, 44 and 51, admitted during the Pen. C. § 1538.5 Hearings (Parts 1 and 2), attached to this order shall be released and placed in the public file. The documents in unredacted form remain under seal pursuant to the court's order scaling those exhibits dated November 15, 2004.

DATED: November 15, 2004

Rodney S. Melville
RODNEY S. MELVILLE
Judge of the Superior Court

IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SANTA BARBARA

SEARCH WARRANT

COUNTY OF SANTA BARBARA)

State of California)

ss.

Case No. _____

(For Court's Use Only)

THE PEOPLE OF THE STATE OF CALIFORNIA, to any Sheriff, Marshal, or Policeman in the County of Santa Barbara: Proof by affidavit, having been this day made to me by Sheriff's Detective Paul Zalis, that there is probable cause for the issuance of a Search Warrant on grounds set forth in Penal Code Section 1524,

YOU ARE HEREBY COMMANDED to make a search at any time of the day only, good cause having been shown therefore, of the following described property:

So much of Suite 108 as contains the offices of Bradley G. Miller, Private Investigator, located in the office building located at 211 South Beverly Drive, Beverly Hills, California; further described as a two-story brick-trimmed building with the numbers "211" directly over large double doors affording primary public access to the building.

in the County of Los Angeles, State of California, for the following described property:

Records of Investigator Miller's professional employment by Michael Jackson or MJJ Productions or an individual or entity shown on the face of the document to be associated with Michael Jackson or MJJ Productions; letters, memoranda, invoices, billings and canceled checks

Computer systems including, but not limited to, personal computers, laptops, notebooks, workstations, and/or servers. Computer networks including, but not limited to, servers, hubs, switches, routers, modems, and/or cabling. Computer hardware including, but not limited to, monitors, input devices, printers, modems, scanners, peripherals, hard disk drives, floppy disk drives, magnetic tape drives, cassette tape drives, removable storage media drives, optical CD-ROM drives, and/or cabling found together or separately from one another. Personal Digital Assistants (PDA), docking devices, and/or cabling. Software and data, including but not limited to, hard disks, floppy disks, tapes, removable media, optical CD-ROM media, and/or networked data

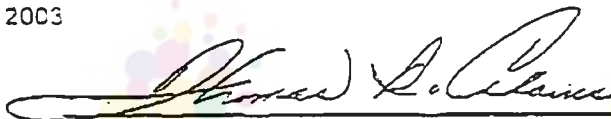
storage. Documentation or other material describing the operation of any computer systems, computer networks, computer hardware, software, and/or computer peripherals found at the premises, including instructions on how to access disks, files, or other material stored within same, including but not limited to computer manuals, printouts, passwords, file name lists, "readme" and/or "help files."

AND TO SEIZE IT IF FOUND and retain it in your custody subject to order of court as provided by law. The Affidavit in support of this warrant was sworn to and subscribed before me this 17th day of November, 2003 at 5:30 a.m. (p.m.)

You are further authorized to photograph and/or videotape the interior and exterior of the premises to be searched and photo-document personal property observed in the course of the search.

Wherefore I find probable cause of the issuance of this Search Warrant and do issue it.

Dated this 17th day of November, 2003



JUDGE OF THE SUPERIOR COURT

<input type="checkbox"/> RECLASSIFICATION CLASSIFICATION		SHERIFF'S DEPARTMENT SANTA BARBARA COUNTY			2 CASE NUMBER 03-5670	
<input checked="" type="checkbox"/> Lewd acts against a child		<input checked="" type="checkbox"/> FOLLOW-UP		<input type="checkbox"/> CLEARANCE		<input type="checkbox"/> COMPLETE
DATE RPT. TIME Friday, 06-13-03, 1520 hrs		4. FOLLOW UP TO:		OTHER		5. DAY/DATE THIS RPT. TIME Tuesday 11-18-03, 0930 hrs
3. VICTIM (LAST, FIRST, MI) Victim 1 Confidential		SEX	RAC	AGE/D.O.B.	RES. OFFICE ADDRESS	
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"/>		CM	SEX	RAC	AGE/D.O.B.	RESIDENT ADDRESS
LAST, FIRST, MIDDLE: CIRCLE INVOLVEMENT Victim 2 Confidential						TELEPHONE
R/P <input type="checkbox"/> WIT <input type="checkbox"/> CO-VIC <input type="checkbox"/> PARENT <input type="checkbox"/> OTHER <input checked="" type="checkbox"/>		CM	SEX	RAC	AGE/D.O.B.	BUS.
		Y	M	W		RES.
R/P <input type="checkbox"/> WIT <input type="checkbox"/> CO-VIC <input type="checkbox"/> PARENT <input type="checkbox"/> OTHER <input checked="" type="checkbox"/>		CM	SEX	RAC	AGE/D.O.B.	BUS.
		Y	M	W		RES.
R/P <input type="checkbox"/> WIT <input type="checkbox"/> CO-VIC <input type="checkbox"/> PARENT <input checked="" type="checkbox"/> OTHER <input type="checkbox"/>		CM	SEX	RAC	AGE/D.O.B.	BUS.
		Y	F	W	ADULT	RES.
1. SUSPECT NAME (LAST, FIRST, MIDDLE) JACKSON, MICHAEL		CM	SEX	RAC	AGE/D.O.B.	HGT
		Y	M	B	45/02-29-58	5'11"
ADDRESS NEVERLAND VALLEY RANCH 5225 Figueroa Mtn Rd, Los Olivos		PHONE	MUSTACHE <input type="checkbox"/>	HAT <input type="checkbox"/>	CLOTHING DESCRIPTION	
			BEARD <input type="checkbox"/>	MASK <input type="checkbox"/>		
			GLASSES <input type="checkbox"/>	TIE/SCAR <input type="checkbox"/>		
2. SUSPECT NAME (LAST, FIRST, MIDDLE) [Redacted]		CM	SEX	RAC	AGE/D.O.B.	HGT
ADDRESS [Redacted]		PHONE	MUSTACHE <input type="checkbox"/>	HAT <input type="checkbox"/>	CLOTHING DESCRIPTION	
			BEARD <input type="checkbox"/>	MASK <input type="checkbox"/>		
			GLASSES <input type="checkbox"/>	TIE/SCAR <input type="checkbox"/>		
3. SUSP. VEH. LICENSE	ST	YR	MAKE	MODEL	COLOR	LOCATION/PERSON
						<input type="checkbox"/> STORED, RELEASED <input type="checkbox"/> IMPOUNDED
4. NAME OF R/O			ADDRESS			
1. COMPLAINT FILED <input type="checkbox"/> YES <input type="checkbox"/> MISDEMEANOR <input type="checkbox"/> NO <input type="checkbox"/> FELONY		12. REVIEWING DA		13. <input type="checkbox"/> CITATION ISSUE <input type="checkbox"/> WARRANT ISSUED <input type="checkbox"/> C.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-451 <input type="checkbox"/> CHP 180		<input checked="" type="checkbox"/> OTHER		<input checked="" type="checkbox"/> PROPERTY TAG # 122980		PAGE 1 OF _____ PAGES
6. RELATED CASE NUMBERS		VICTIM OR BUSINESS	DATE REPORTED	CRIME TYPE	CASE STATUS	
7. REPORTING DEPUTY BODY # DET R FORNEY #2522	12. DATE/TIME RPT WRITTEN 11-19-03/0917	19. EST. TOTAL VALUE DNA	20. TOTAL HOURS W/KD 20	RECORDS USE ONLY RECEIVED 2423 DATE 11/21/04 BCS RMS		
13. ASSISTING DEPUTY BODY # DA INVESTIGATOR TONE:10	21. SUPERVISOR APPROVING BODY # SGT W. BOLDWELL #0344	22. TYPED BY/DATE 3124/11-20-03				

1. Issued for the exclusive use of, and is not to be duplicated, copied or furnished to any agency, except as provided by law, without the express permission of the Santa Barbara County Sheriff's Department Records Bureau and is to be returned to that Department upon demand.

Copy for: () Detectives () Juvenile () Custody
 () Patrol () Investigator

#21

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

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

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

3
 4 Item Number 819, One TVK mini-digital video tape marked [REDACTED]
 5
 6 Items Number 811 through 819 were taken from the entertainment center located
 7 in the conference room in [REDACTED]
 8

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

11
 12 Item Number 821, one faxed Memo from [REDACTED]

13
 14 Items Number 820 and 821 were located in [REDACTED] personal office in a
 15 plastic storage container.
 16

17 [REDACTED]
 18 [REDACTED]
 19

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

21
 22 Items Number 822 and 823 were located on top of [REDACTED] desk in his
 23 personal office.
 24

25 Item Number 824, one Maxtor D540X, hard drive Serial Number 674118925717.

26 This hard drive was removed from the computer in [REDACTED] personal
 27 office by [REDACTED]

2100

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

1 Item Number 825, one Maxtor 4D080H4 hard drive Serial Number
2 D402N'L5EFD24A. This hard drive was removed from the computer in the
3 receptionist's office by [REDACTED]
4

5 Item Number 826, one copy of the hard drive from the computer in the
6 conference room of [REDACTED] office. This copy was made by [REDACTED]
7 [REDACTED]
8

9 All of the above items were packaged by [REDACTED] and me. Sergeant
10 Caldwell subsequently booked all of the aforementioned items into the property
11 room at the Goleta Main Station, as evidence.
12

13 28 digital photos were taken of [REDACTED] office prior to and after the execution of
14 the search warrant. These photos were submitted to Forensics for downloading.
15

16 Attachment:

17 A sketch of the floor plan of [REDACTED] office, drawn by [REDACTED]
18

19 (C) Narrative:

20 On 11-18-03, at about 0700 hours, [REDACTED] and [REDACTED]
21 and I met at the Beverly Hills Police Department, in preparation to serve a
22 Search Warrant at 211 South Beverly Drive, Number 108, in Beverly Hills.
23

24 The Search Warrant had been obtained by [REDACTED] and signed by
25 [REDACTED], on 11-17-03.
26

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

216

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 11-15-03, 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 [REDACTED] 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.

PAGE 6	SHERIFF'S DEPARTMENT		03:5670
	Santa Barbara County		
	CONTINUATION SHEET		
(A) LIST CONTINUATION. (B) DESCRIBE: PHYSICAL EVIDENCE, LOCATION FOUND & DISPOSITION. (C) NARRATIVE. (D) DISPOSITION.			

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

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

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

At approximately 1200 hours, [REDACTED] arrived at his office.

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

[REDACTED] and I continued our search and completed it at approximately 1305 hours.

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

PAGE 7	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 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 [REDACTED]
5 had a storage space rental at the [REDACTED]
6 [REDACTED]. 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. Officer's Qualification
#108
0211 So. BARNETT, Ben Davis

SHERIFF'S DEPARTMENT
SANTA BARBARA COUNTY
PROPERTY FORM

2. Case Number
03-5670

7a. Attachment
to Report
YES ☐ NO ☐

4. Victim's Description
[REDACTED]

5. Recapturing Office & Date
Kendall #2522 11-18-03 @ OPR

6. Date & Time of Report
11-18-03 @ OPR

7. Condition of Property
Found: Follow-up
Lost: [REDACTED]

8. Property Type
S. STOLEN
L. LOST

9. Discovery
H. DISCOVERED
F. FOUND BY
E. EVIDENCE
U. UNKNOWN
O. OTHER

10. Item No.	11. Serial No.	12. Description	13. Details Property	14. Entry Type Code	15. Value	16. Evidence Eg. No
811	11420	LIK VHS T-120	VIDEO RE: [REDACTED]	E		132980
812	11420	MARVEL VHS T-120	RE: [REDACTED]	E		"
813	"	MARVEL VHS T-120	JACKSON	E		"
814	"	MARVEL VHS T-120	JACKSON	E		"
815	"	SONY VHS T-120	MOVIE 03-05-03 NY	E		"
816	"	MARVEL VHS T-120	MTJ - [REDACTED]	E		"
817	11420	TDK CASSETTE	MTJ - [REDACTED]	E		"
818	11420	TDK CASSETTE	MTJ - [REDACTED]	E		"
819	11420	TDK Music Discs 11420	MTJ - [REDACTED]	E		"
820	11420	ITEMS #811 THRU #819	FROM CONFERENCE VIDEO OFFICE	E		"
821	11420	SONY VHS T-120	MICHAEL JACKSON - UNMARRIED	E		"
822	11420	TO GEORGES/MITCHELL	MICHAEL JACKSON	E		"
823	11420	ITEM #820 & #821 THRU FRONT MILLER OFFICE	PLASTIC STORAGE CONTAINER	E		"
824	11420	CONFIDENTIAL 11420	[REDACTED]	E		"
825	11420	11420 & #823 THRU FRONT TOP OF	MICHAEL JACKSON	E		"

This copy is for the [REDACTED] and is not to be distributed to any other person or agency without the express permission of the Santa Barbara Sheriff's Office.

EXCEPTIONAL BY [REDACTED] AUTHORITY IS AUTHORIZED

TO: [REDACTED]

DATE: 11-18-03

Page 1 of 2

1. Officer or Classification

SEARCH WARRANT

SHERIFF'S DEPARTMENT
SANTA BARBARA COUNTY
PROPERTY FORM

2. Case Number

03-50770

3. Attendant

to Return
YES ☐ NO ☐

3. Vehicle Identification

4. Vehicle Description

5. Officer's Office & Duty No.

6. Date & Time of Report

7. Continuation of Report

8. Property Type Codes: II - (See Inventory)
I - STOLEN
II - FOUND
III - PROBABLY OBSERVATION

1. Item	2. Serial No.	3. Description	4. Date & Time of Report	5. Continuation of Report	6. Property Type Codes	7. Found	8. Inventory
1	11	12	13	14	15	16	17
2	11	12	13	14	15	16	17
3	11	12	13	14	15	16	17
4	11	12	13	14	15	16	17
5	11	12	13	14	15	16	17
6	11	12	13	14	15	16	17
7	11	12	13	14	15	16	17
8	11	12	13	14	15	16	17
9	11	12	13	14	15	16	17
10	11	12	13	14	15	16	17
11	11	12	13	14	15	16	17
12	11	12	13	14	15	16	17
13	11	12	13	14	15	16	17
14	11	12	13	14	15	16	17
15	11	12	13	14	15	16	17
16	11	12	13	14	15	16	17
17	11	12	13	14	15	16	17
18	11	12	13	14	15	16	17
19	11	12	13	14	15	16	17
20	11	12	13	14	15	16	17
21	11	12	13	14	15	16	17
22	11	12	13	14	15	16	17
23	11	12	13	14	15	16	17
24	11	12	13	14	15	16	17
25	11	12	13	14	15	16	17
26	11	12	13	14	15	16	17
27	11	12	13	14	15	16	17
28	11	12	13	14	15	16	17
29	11	12	13	14	15	16	17
30	11	12	13	14	15	16	17
31	11	12	13	14	15	16	17
32	11	12	13	14	15	16	17
33	11	12	13	14	15	16	17
34	11	12	13	14	15	16	17
35	11	12	13	14	15	16	17
36	11	12	13	14	15	16	17
37	11	12	13	14	15	16	17
38	11	12	13	14	15	16	17
39	11	12	13	14	15	16	17
40	11	12	13	14	15	16	17
41	11	12	13	14	15	16	17
42	11	12	13	14	15	16	17
43	11	12	13	14	15	16	17
44	11	12	13	14	15	16	17
45	11	12	13	14	15	16	17
46	11	12	13	14	15	16	17
47	11	12	13	14	15	16	17
48	11	12	13	14	15	16	17
49	11	12	13	14	15	16	17
50	11	12	13	14	15	16	17
51	11	12	13	14	15	16	17
52	11	12	13	14	15	16	17
53	11	12	13	14	15	16	17
54	11	12	13	14	15	16	17
55	11	12	13	14	15	16	17
56	11	12	13	14	15	16	17
57	11	12	13	14	15	16	17
58	11	12	13	14	15	16	17
59	11	12	13	14	15	16	17
60	11	12	13	14	15	16	17
61	11	12	13	14	15	16	17
62	11	12	13	14	15	16	17
63	11	12	13	14	15	16	17
64	11	12	13	14	15	16	17
65	11	12	13	14	15	16	17
66	11	12	13	14	15	16	17
67	11	12	13	14	15	16	17
68	11	12	13	14	15	16	17
69	11	12	13	14	15	16	17
70	11	12	13	14	15	16	17
71	11	12	13	14	15	16	17
72	11	12	13	14	15	16	17
73	11	12	13	14	15	16	17
74	11	12	13	14	15	16	17
75	11	12	13	14	15	16	17
76	11	12	13	14	15	16	17
77	11	12	13	14	15	16	17
78	11	12	13	14	15	16	17
79	11	12	13	14	15	16	17
80	11	12	13	14	15	16	17
81	11	12	13	14	15	16	17
82	11	12	13	14	15	16	17
83	11	12	13	14	15	16	17
84	11	12	13	14	15	16	17
85	11	12	13	14	15	16	17
86	11	12	13	14	15	16	17
87	11	12	13	14	15	16	17
88	11	12	13	14	15	16	17
89	11	12	13	14	15	16	17
90	11	12	13	14	15	16	17
91	11	12	13	14	15	16	17
92	11	12	13	14	15	16	17
93	11	12	13	14	15	16	17
94	11	12	13	14	15	16	17
95	11	12	13	14	15	16	17
96	11	12	13	14	15	16	17
97	11	12	13	14	15	16	17
98	11	12	13	14	15	16	17
99	11	12	13	14	15	16	17
100	11	12	13	14	15	16	17

This form is to be used for the purpose of recording the results of a search of the records of the Santa Barbara County Sheriff's Department. It is to be filled out by the officer who conducted the search and is to be filed in the records of the Santa Barbara County Sheriff's Department.

EXCEPTIONAL DISCUSSION IS AUTHORIZED
TO:

Enacted

1. RECLASSIFICATION 1. CLASSIFICATION 288(a) PC - Sex offense or lewd act against a child		SHERIFF'S DEPARTMENT SANTA BARBARA COUNTY				2. CASE NUMBER 03-5670	
3. DAY / DATE RPT / TIME Friday 06-13-03, 1520 hrs		4. FOLLOW UP TO: <input checked="" type="checkbox"/> FOLLOW-UP <input type="checkbox"/> CLEARANCE <input type="checkbox"/> COMPLAINT		5. DATE / DATE RPT / TIME Wednesday 11-12-03, 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. RP <input type="checkbox"/> WT <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	
RP <input type="checkbox"/> WT <input type="checkbox"/> CO-VIC <input type="checkbox"/> PARENT <input type="checkbox"/> OTHER <input type="checkbox"/> Snedden, Tom Jr. D.A.		CM	SEX	RAC	AGE/D.O.B.	RESIDENT ADDRESS	
RP <input type="checkbox"/> WT <input type="checkbox"/> CO-VIC <input type="checkbox"/> PARENT <input type="checkbox"/> OTHER <input type="checkbox"/> Victim 3 - "CONFIDENTIAL"		CM	SEX	RAC	AGE/D.O.B.	RESIDENT ADDRESS	
RP <input type="checkbox"/> WT <input type="checkbox"/> CO-VIC <input type="checkbox"/> PARENT <input type="checkbox"/> OTHER <input type="checkbox"/> Victim 4 - "CONFIDENTIAL"		CM	SEX	RAC	AGE/D.O.B.	RESIDENT ADDRESS	
9. SUSPECT NAME (LAST, FIRST, MIDDLE) Beckner, Michael		CM	SEX	RAC	AGE/D.O.B.	HGT	WGT
ADDRESS Neverland Ranch 5225 Figueroa Mtn. Rd., Santa Ynez		PHONE	MUSTACHE	HAT	CLOTHING DESCRIPTION		
		BEARD	GLASSES	TT/SCAR			
10. SUSPECT NAME (LAST, FIRST, MIDDLE) Victim 5 - "CONFIDENTIAL"		CM	SEX	RAC	AGE/D.O.B.	HGT	WGT
ADDRESS Victim 6 - "CONFIDENTIAL"		PHONE	MUSTACHE	HAT	CLOTHING DESCRIPTION		
		BEARD	GLASSES	TT/SCAR			
11. SUSP VEHICLE DNA		ST	YR	MAKE	MODEL	COLOR	LOCATION/PERSON
NAME OF RD. Victim 7 - "CONFIDENTIAL"		ADDRESS					
12. COMPLAINT FILED <input type="checkbox"/> YES <input type="checkbox"/> MISDEMEANOR <input type="checkbox"/> NO <input type="checkbox"/> FELONY		13. REVIEWING DA Victim 8 - "CONFIDENTIAL"		14. CITATION ISSUE <input type="checkbox"/> D.A. NOTICE <input type="checkbox"/> REF. TO PROBATION		15. WARRANT ISSUES <input type="checkbox"/> IN CUSTODY <input type="checkbox"/> OUT ON BAIL	
16. ATTACHMENTS: <input checked="" type="checkbox"/> GH401 <input type="checkbox"/> CHP 180 <input checked="" type="checkbox"/> OTHER <input checked="" type="checkbox"/> PROPERTY TAG # 122930		PAGE 1 OF 7 PAGES					
17. RELATED CASE NUMBERS Victim 9 - "CONFIDENTIAL"		VICTIM OR BUSINESS Victim 10 - "CONFIDENTIAL"		DATE REPORTED Victim 11 - "CONFIDENTIAL"		CRIME TYPE Victim 12 - "CONFIDENTIAL"	
18. CASE STATUS Victim 13 - "CONFIDENTIAL"							
19. REPORTING DEPUTY BODY # Det. P. Zalls / 2867		20. DATE/TIME RPT WRITTEN 11-13-03 / 1430		21. EST TOTAL VALUE 1/2 hr.		22. TOTAL HOURS WFO 1/2 hr.	
23. ASSISTING DEPUTY BODY # Victim 14 - "CONFIDENTIAL"		24. SUPERVISOR APPROVING BODY # [Signature]		25. TYPED BY/DATE Victim 15 - "CONFIDENTIAL"		RECORDS USE ONLY RECEIVED 2423 DATE 11/21/04 BCS RMS	

This copy is intended for the exclusive use of the Sheriff's Department and is not to be distributed to any other person or agency, except as provided by law, without the express permission of the Santa Barbara Sheriff's Department Records Bureau and is to be returned to that Department upon demand.

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		

(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 Delcours" brand. Lalan

2910

DEPARTMENT BARBARA COUNTY PROPERTY FORM		2. CASE NUMBER 03-5670	2a. attach to report Yes
		PAGE #Prop-1 OF Prop-1	
6. DATE/TIME OF REPORT 11-12-03 / 0830		7. CONT. TO: TYPE OF RPT FORM Offense	
8. PARTY TYPE CODE: R (RECOVERED), S (STOLEN), F (FOUND), L (LOST), E (EVIDENCE), O (UNDER OBSERVATION)			
13. DESCRIBE PROPERTY	14. PARTY TYPE CODE	15. VALUE	16. EVIDENCE TAG NO.
DVD, containing short film of Michael Jackson and [REDACTED] At Neverland, dated 9/6/2000	E	0	122980
Black colored wool jacket, size 48 Medium.	E	Unk.	122980
Four DMV printouts including pictures of [REDACTED] Includes two blank cutout papers to cover personal information.	E	0	122980

EVIDENCE NEEDED BY BARBARA COUNTY

YES

NO

TT USE

THOMAS W. SNEDDON, JR.
District Attorney

MARNIE R. PINSKER
Assistant Director

DAVID M. SAUNDERS
Chief Investigator



PATRICK J. MCKINLEY
Assistant District Attorney

CHRISTIE STANLEY
Assistant District Attorney

ERICA A. HANSON
Chief Trial Deputy

COUNTY OF SANTA BARBARA
DISTRICT ATTORNEY

August 12, 2004

Robert Sanger, Esq.
Sanger & Swysem, Lawyers
233 East Castillo 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

TW8:ra
Attachments

cc: Steve Cochran, Esq.
Thomas A. McKinley, Jr., Esq.
R. Dean Odom, Esq.
Suzanne C. Yu, Esq.

☐ Santa Barbara Office
1112 Santa Barbara Street
Santa Barbara, CA 93101
(805) 568-2300
FAX (805) 568-2455

☐ Lompoc Office
115 Civic Center Plaza
Lompoc, CA 93430
(805) 737-7760
FAX (805) 737-7722

☐ Santa Maria Office
312-D East Cook Street
Santa Maria, CA 93456
(805) 346-7540
FAX (805) 346-7588

#35

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

Date: November 14, 2003

To: All Concerned Personnel

From: Sgt. Eric Koornmans

Subject: Search Warrant - Michael Jackson's Neverland Ranch

CASE SUMMARY

On June 13, 2003, CID reopened 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

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 5225 Figueroa Mountain Road, Los Olivos. The ranch can be located on page 900, H-1 of the Thomas Guide. The ranch is approx. 2544 acres in size. The main outer gate is located on Figueroa Mountain Road 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 18, 2003. A pre-operation briefing will be held at 0600 hours at the Solvang Vets Hall. During the briefing, Sgt. Robel will provide personnel with a summary of the case and what evidence will be searched for at the Neverland Ranch. Once Sgt. Robel 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.

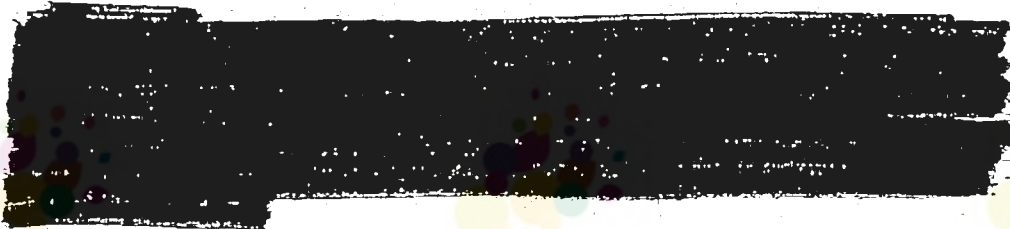
STAGING AREA

Once briefing is completed, all personnel will drive to Nojoqui 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. Klapealis, Sgt. Robel 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. Klapealis, Sgt. Robel 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 SISO 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.



00-3400

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. 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 McCannan 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.

503531

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 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 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. Rotei. A list of potential questions will be provided to interviewers.

OFF-SITE/LOGISTICS

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

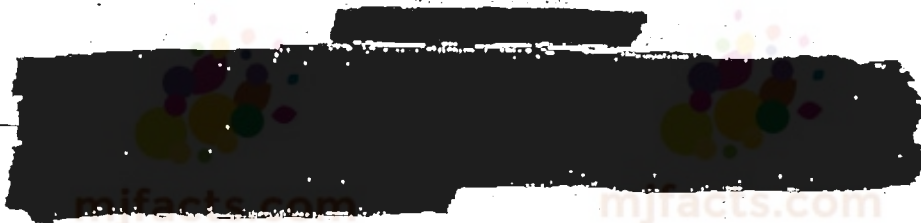
003502

mjfacts.com

mjfacts.com

mjfacts.com

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



mjfacts.com

mjfacts.com

mjfacts.com

mjfacts.com

mjfacts.com

mjfacts.com

mjfacts.com

mjfacts.com

mjfacts.com

mjfacts.com

mjfacts.com

mjfacts.com

003503



mjfacts.com



mjfacts.com



mjfacts.com

[REDACTED]

[REDACTED]

[REDACTED]

mjfacts.com mjfacts.com

[REDACTED]

[REDACTED]



mjfacts.com



mjfacts.com



mjfacts.com



mjfacts.com



mjfacts.com



mjfacts.com



mjfacts.com



mjfacts.com



mjfacts.com



mjfacts.com

003504

mjfacts.com

mjfacts.com

mjfacts.com

[REDACTED]

[REDACTED]

mjfacts.com

mjfacts.com

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

mjfacts.com

mjfacts.com

mjfacts.com

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

mjfacts.com

mjfacts.com

mjfacts.com

mjfacts.com

mjfacts.com

mjfacts.com

mjfacts.com

003505

mjfacts.com

mjfacts.com

mjfacts.com

mjfacts.com

mifacts.com

mjfacts.com

mjfacts.com

mifacts.com

mjfact

mifacts.com

mjfacts.com

mjfacts.com

mjfacts.com

mjfacts.com

mjfacts.com

003506

mjfacts.com

mjfacts.com

mjfacts.com

mjfacts.com

mjfacts.com

mjfacts.com

mjfacts.com

mjfacts.com

mjfacts.com

mjfacts.com

mjfacts.com

mjfacts.com

mjfacts.com

mjfacts.com

mjfacts.com

mjfacts.com

mjfacts.com

mjfacts.com

mjfacts.com

mjfacts.com

mjfacts.com

mjfacts.com

mjfacts.com

mjfacts.com

mjfacts.com

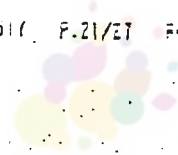
mjfacts.com

mjfacts.com

mjfacts.com

mjfacts.com

003508



mifacts.com

36

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name and Address): THOMAS A. MESEREAU, JR. (91182) Collins, Mesereau, Raddock & Yu, LLP 1875 Century Park East, Suite 700 Los Angeles, CA 90067 ATTORNEY FOR (Name): Michael Joe Jackson	TELEPHONE NO.: (310) 284-3120	FOR COURT USE ONLY EXHIBIT NO. 36 Case No. 1133603 <input checked="" type="checkbox"/> Det. <input type="checkbox"/> Minor <input type="checkbox"/> Resp. <input type="checkbox"/> Spock D. 8-17-04 EAO GARY M. JAR By <i>[Signature]</i>
Name of court, judicial district or branch court, if any, and post office and street address: Santa Barbara County Superior Court, Santa Maria Division 312 E. Cook Street (Dept. SM-2 Judge Rodney Melville) Santa Maria, CA 93454		
Title of case: The People of the State of California v. Michael Jackson, et al.		
SUBPENA (CRIMINAL OR JUVENILE) <input type="checkbox"/> DUCES TECUM		CASE NUMBER: 1133603

THE PEOPLE OF THE STATE OF CALIFORNIA, TO (NAME):

Dr. Stanley Katz, 9401 Wilshire Blvd., #730, Beverly Hills, CA 90212, Tel: (310) 276-3648

1. YOU ARE ORDERED TO APPEAR AS A WITNESS in this action at the date, time, and place shown in the box below UNLESS you make a special agreement with the person named in Item 3:

a. Date: July 27, 2004	Time: 8:30 a.m.	<input checked="" type="checkbox"/> Dept. SM-2 <input type="checkbox"/> Div.: <input type="checkbox"/> Room:	OR the Department in which Judge Melville may be Presiding
b. Address: 312 E. Cook Street, Dept. SM-2 (Judge Rodney Melville) Santa Maria, CA 93454			

2. AND YOU ARE

- a. ☐ ordered to appear in person.
- b. ☐ not required to appear in person if you produce the records described in the accompanying affidavit and a completed declaration of custodian of records in compliance with Evidence Code sections 1560, 1581, 1582, and 1271. (1) Place a copy of the records in an envelope (or other wrapper). Enclose your original declaration with the records. Seal them. (2) Attach a copy of this subpoena to the envelope or write on the envelope the case name and number, your name and date, time, and place from item 1 (the box above). (3) Place this first envelope in an outer envelope, seal it, and mail it to the clerk of the court at the address in item 1. (4) Mail a copy of your declaration to the attorney or party shown at the top of this form.
- c. ☒ ordered to appear in person and to produce the records described in the accompanying affidavit. The personal attendance of the custodian or other qualified witness and the production of the original records is required by this subpoena. The procedure authorized by subdivision (b) of section 1580, and sections 1581 and 1582, of the Evidence Code will not be deemed sufficient compliance with this subpoena.
- d. ☐ ordered to make the original business records described in the accompanying affidavit available for inspection at your business address by the attorney's representative and to permit copying at your business address under reasonable normal business hours, conditions during normal business hours.

3. IF YOU HAVE ANY QUESTIONS ABOUT THE TIME OR DATE FOR YOU TO APPEAR, OR IF YOU WANT TO BE CERTAIN THAT YOUR PRESENCE IS REQUIRED, CONTACT THE FOLLOWING PERSON BEFORE THE DATE ON WHICH YOU ARE TO APPEAR:

- a. Name: Susan C. Yu, Esq. b. Telephone number: (310) 284-3120
4. WITNESS FEES: You may be entitled to witness fees, mileage, or both, in the discretion of the court. Contact the person named in item 3 AFTER your appearance.

DISOBEDIENCE OF THIS SUBPENA MAY BE PUNISHED BY A FINE, IMPRISONMENT, OR BOTH. A WARRANT MAY ISSUE FOR YOUR ARREST IF YOU FAIL TO APPEAR.

FOR COURT USE ONLY	Date: July 19, 2004	<div style="text-align: center;">  (SIGNATURE OF PERSON ISSUING SUBPENA) </div> <div style="text-align: center;"> Thomas A. Mesereau, Jr. (TYPE OR PRINT NAME) Attorney for Michael J. Jackson (TITLE) </div>
(See reverse for proof of service)		

Form Adopted by Rule 952,
Judicial Council of California
8/22/04 (Rev. January 1, 1991)

SUBPENA
(CRIMINAL OR JUVENILE)

Penal Code, § 1208 et seq.
Welfare and Institutions Code, §§ 341, 684, 1727

www.accesslaw.com

#36

DECLARATION OF THOMAS A. MESEREAU, JR.
IN SUPPORT OF SUBPENA TO DR. STANLEY KATZ

I, Thomas A. Mesereau, Jr., declare as follows:

1. I am an attorney at law, duly licensed to practice before all of the Courts of the State of California. I am a member of the California Bar and am the lead defense counsel to Mr. Michael J. Jackson in the case of The People of the State of California v. Michael J. Jackson, et al., Santa Barbara County Superior Court, Santa Maria Division, 1133603 ("Pending Criminal Case"). I have personal knowledge of the facts set forth herein and, if called and sworn as a witness, I could and would competently testify thereto under oath.

2. This declaration has been prepared and executed in support of a Subpena to witness Dr. Stanley Katz for appearance and production of documents (described below) at the duly-set hearing on July 27, 2004, at 8:30 a.m., in Department SM-2 of the Santa Barbara County Superior Court, located at 312 East Cook Street, Santa Maria, California 93454. The Subpena requires Dr. Katz to produce the following documents, objects, or other tangible things which are within his custody, possession, or control.

3. **INSTRUCTIONS AND DEFINITIONS:**

a. As used herein, the term "DOCUMENT" or "DOCUMENTS" means any handwritten, recorded, typed, printed, pictorial, or graphic matter whatsoever, however produced or reproduced, and including without limitation, all "WRITINGS" as defined in California Evidence Code § 250. The term "DOCUMENT" or "DOCUMENTS" also includes any data compilation of any sort, whether stored magnetically, electronically, or otherwise, from which information can be obtained, translated, or, if necessary, through detection devices into reasonably

DECLARATION OF OF THOMAS A. MESEREAU, JR.
IN SUPPORT OF SUBPENA TO STANLEY KATS FOR APPEARANCE
AND PRODUCTION OF RECORDS AT THE JULY 27, 2004 HEARING

1 usable form. Any comment or notation appearing on any document, and not a part of
2 the original text, is considered a separate document and any copy, draft, or preliminary
3 form of any document is also considered a separate document.

4 b. As used herein, the term "DOCUMENT" is intended to include
5 within its scope each and every "ORIGINAL" (as the term is defined in California
6 Evidence Code Section 255), and each and every "DUPLICATE" (as the term is
7 defined in Evidence Code Section 260), of each and every "WRITING" (as the term is
8 defined in California Evidence Code § 250) described in the requests set forth below.

9 c. As used herein, the "COMPLAINANTS" refers to [REDACTED]
10 [REDACTED], or any person who accompanied these
11 individuals during any interview, therapy session, or discussion you had with these
12 named individuals, jointly or severally. The term "COMPLAINANTS" refers to all the
13 individuals mentioned in this paragraph individually, whether or not the names of the
14 others persons identified in this paragraph appear or are mentioned in the
15 DOCUMENT. The term "COMPLAINANTS" also include present and former
16 attorneys, agents, representatives, and any other persons acting on behalf of
17 COMPLAINANT.

18 d. As used herein, the "COMPLAINT" refers to the reports, claims,
19 or allegations made by the COMPLAINANTS regarding Mr. Michael Jackson, which
20 was made to you, or which you have made to any law enforcement agency or personnel
21 at any time.

22 e. "YOU" or "YOURS" refers to Stanley J. Katz, and all of his
23 agents, representatives, employees, attorneys, or any person acting on his behalf.

24 f. As used herein, "PERSON" or "PERSONS" means any natural
25 individual in any capacity whatsoever, and all entities of every description, including,
26

27 DECLARATION OF OF THOMAS A. MESEKEAU, JR.
28 IN SUPPORT OF SUBPENA TO STANLEY KATS FOR APPEARANCE
AND PRODUCTION OF RECORDS AT THE JULY 27, 2004 HEARING

1 but not limited to, associations, organizations (public or private), agencies, companies,
2 partnerships, joint ventures, corporations, and trusts.

3 f. As used herein, "REPRESENTATIVE" or
4 "REPRESENTATIVES" means any person (as defined herein) who acts, has at any
5 time acted, or has purported to act, at the request of, for the benefit of, or on behalf of
6 another, including, but not limited to, the parents, guardians, or agents of
7 COMPLAINANT.

8 g. As used herein, the term "COMMUNICATION" is to be
9 interpreted comprehensively, and means any instance in which information was
10 exchanged between or among two or more persons, including any oral or written
11 utterance, notation, or statement of any nature whatsoever, by and to whomsoever
12 made, and all understanding or exchanges of information between or among two or
13 more persons.

14 h. As used herein, the term "CORRESPONDENCE" means any
15 handwritten, printed, typed, or otherwise recorded communication whatsoever between
16 or among two or more persons, and includes, without limitation, memoranda, letters,
17 notes, telegrams, telexes, facsimile transmissions, email records, and marginal
18 notations or comments.

19 4. DOCUMENTS TO BE PRODUCED:

20 a. All DOCUMENTS constituting, evidencing, concerning,
21 discussing or mentioning the COMPLAINANT.

22 b. All DOCUMENTS constituting, evidencing, concerning,
23 discussing or mentioning the identity of the COMPLAINANTS.

24 c. All DOCUMENTS constituting, evidencing, concerning,
25 discussing or mentioning attorney Gloria Rachel Allred, whose California State Bar
26

27 DECLARATION OF OF THOMAS A. MESEREAU, JR.
28 IN SUPPORT OF SUBPENA TO STANLEY KATS FOR APPEARANCE
AND PRODUCTION OF RECORDS AT THE JULY 27, 2004 HEARING

1 Number is 65033, as they relate to the COMPLAINANT and/or the COMPLAINTS.

1 (2) Material reviewed, consulted, or relied upon in diagnosing,
2 assessing, or treating COMPLAINANTS and/or as they relate to the COMPLAINT,
3 including but not limited to, research, books consulted, treatises consulted, medical
4 records, medical histories, opinions of other physicians, news articles, or any other
5 document assisting in forming your opinion relating to COMPLAINANTS and/or the
6 COMPLAINT.

7 (3) Correspondence, letters, discussions, notes, memoranda,
8 and other communications as they relate to the COMPLAINT and/or the
9 COMPLAINANTS, including but not limited to, communications with other
10 physicians, lawyers, the Department of Children Protective Services, Department of
11 Children and Family Services, Department of Social Services, Santa Barbara Sheriffs
12 Department, Los Angeles Police Department, all other federal, local, state agencies,
13 and any person, business, or other entity;

14 (4) Prescribed medications, diagnostic procedures, therapies
15 administered, drugs utilized, and treatments administered as they relate to the
16 COMPLAINT and/or the COMPLAINANTS;

17 (5) Billings, requests for payment, receipts for payments,
18 reimbursements, bank deposits, copies of cancelled checks, and receipt of all things of
19 valuable consideration, whether given by the COMPLAINANTS or any persons acting
20 on their behalf, as they relate to the COMPLAINT and/or COMPLAINANTS;

21 (6) All payments or transfers of consideration made to you by _____

- 1 (c) William Dickerman;
2 (d) Larry Feldman;
3 (e) Carol Lieberman;
4 (f) Thomas Sneddon;
5 (g) Any federal, state or county agency or entity, as
6 it/they relates/relate to the COMPLAINT and/or COMPLAINANTS;
7 (h) Any third party payor;
8 (i) Any person, business, or other entity.
9 (g) Video or audio tape recordings, computer or digital
10 voice records, and any photographic images as they relate to the COMPLAINT and/or
11 COMPLAINANTS;
12 (h) Telephone notes, telephone logs, message books,
13 message slips or other records regarding telephone calls from any person, business, and
14 other entity as they relate to the COMPLAINT and/or the COMPLAINANTS;
15 (i) Telephone records, bills, and phone company
16 printouts showing telephone calls to or from COMPLAINANTS, any person acting on
17 behalf of COMPLAINANTS, Larry Feldman, William Dickerman, Thomas Sneddon,
18 Gloria Alred, Carol Lieberman, M.D, any social service or child protective service
19 agency, and any law enforcement personnel as they relate to the COMPLAINT and/or
20 the COMPLAINANTS
21 (j) Reports, communications, or correspondence to or
22 from the Department of Child Protective Services, Department of Social Services,
23 Department of Children and Family Services, and any state or local agency as they
24 related to the COMPLAINT and/or the COMPLAINANTS;
25
26
27
28

DECLARATION OF OF THOMAS A. MESEREAU, JR.
IN SUPPORT OF SUBPENA TO STANLEY KATS FOR APPEARANCE
AND PRODUCTION OF RECORDS AT THE JULY 27, 2004 HEARING

1 (k) Curriculum Vitae, biography, and resume for Stanley
2 Katz;

3 (l) All DOCUMENTS notes, memoranda,
4 correspondence, or communications evidencing your visit to or discussions with L.A.
5 County Child Protective Services on June 12, 2003, or any other date, as they relate to
6 the COMPLAINT and/or the COMPLAINANTS, including but not limited to,
7 communications with Mr. Sanders, Mr. Sanders, or any other person, business, or
8 other entity associated with such entity, and DOCUMENTS which identify or mention
9 persons who accompanied you on such visits;

10 (m) All DOCUMENTS, notes, memoranda,
11 correspondence, or communications concerning or relating to Bradley Miller, or any
12 association you have with him;

13 (n) All DOCUMENTS constituting, evidencing,
14 concerning, discussing or mentioning, either directly or indirectly, the case of People
15 of the State of California v. Michael Jackson, Santa Barbara County Superior Court
16 Case No. 1133603.

17 5. The above documents are material to the issues involved in the case by
18 reason of the following facts:

19 a. The information sought will lead to witness, documents, and
20 discoverable evidence that will show the claims made in the Pending Criminal Case in
21 the Santa Barbara Superior Court are unfounded.

22 b. The information sought by this subpoena will disclose motives,
23 biases, and exaggerations on behalf of and engaged in by Witness Katz and
24 COMPLAINANTS;

25 c. The information sought contains information regarding the
26

27 DECLARATION OF OF THOMAS A. MESEREAU, JR.
28 IN SUPPORT OF SUBPENA TO STANLEY KATS FOR APPEARANCE
AND PRODUCTION OF RECORDS AT THE JULY 27, 2004 HEARING

1 background, motives, state of mind, character and reputation for veracity, and reports
2 of COMPLAINANTS,

3 d. The requested documents and/or information contains the prior
4 inconsistent statements, recollections, observations, and reactions of
5 COMPLAINANTS to the events and circumstances which gave rise to the Pending
6 Criminal Case in the Santa Barbara Superior Court;

7 e. The requested materials constitute the faulty perception, inability to
8 perceive, errors, and mistakes of Witness Katz and COMPLAINANTS;

9 6. Good cause exists for the production of the above described matters and
10 things by reason of the following facts:

11 a. Stanley Katz is the sole and exclusive source of all such
12 information, and no other person, business, or other entity has possession or control of
13 such information.

14 b. The information requested by this Subpoena discloses the motive,
15 intent, and conscious state of mind of persons making claims in the Santa Barbara
16 Superior Court, along with persons directing, counseling and controlling the
17 complainants in the Santa Barbara Superior Court action.

18 c. No other source exists for such information because such
19 disclosures were made only to Witness Stanley Katz, and the only person with such
20 information is Witness Stanley Katz.

21 I declare under penalty of perjury under the laws of the State of California that
22 the foregoing is true and correct and that this declaration was executed on this 18 day
23 of July 2004, at Los Angeles, California.

24
25 
26 THOMAS A. MESEREAU, JR.

27 DECLARATION OF OF THOMAS A. MESEREAU, JR.
28 IN SUPPORT OF SUBPENA TO STANLEY KATZ FOR APPEARANCE
AND PRODUCTION OF RECORDS AT THE JULY 27, 2004 HEARING

Case No. 1133603

☒ Def ☐ Minor☐ Resp. ☐ Special

LD 8-28-04

9-20-04

GARYN KING

GAIT OVERBATH

501 Rm. 4-25

General Interview Questions

- All horsepower, including home, work, phone numbers, DL number, etc.
- If working for Michael Jackson, how long, when did you start and duties?

16. *Manufacture of*

[REDACTED]

[REDACTED]

www.merck.com

[REDACTED]

myfracts.com myfracts.com

infacts.com

Page 3	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) CASE DISPOSITION		

1 WAIVER OF LAWYER-CLIENT PRIVILEGE and
2 CONSENT TO LIMITED DISCLOSURE OF PRIVILEGED COMMUNICATIONS
3 (Evid. Code, § 912)

4 I, [REDACTED] say:
5 1. [REDACTED]
6 [REDACTED]
7 [REDACTED]
8 [REDACTED]
9 2. [REDACTED]
10 [REDACTED]
11 [REDACTED]
12 [REDACTED]
13 [REDACTED]
14 [REDACTED]
15 [REDACTED]
16 3. [REDACTED]
17 [REDACTED]
18 [REDACTED]
19 [REDACTED]
20 [REDACTED]
21 4. [REDACTED]
22 [REDACTED]
23 5. [REDACTED]
24 [REDACTED]
25 [REDACTED]
26 [REDACTED]
27 [REDACTED]
28 [REDACTED]

EXHIBIT NO. 51
Case No. 1133603
☒ Gen. ☐ Minor
☐ Resp. ☐ Special
I.D. 9-17-04
Date 9-17-04
GARY M. ELWA
By Tamara Fey
Form 4-03

WAIVER OF LAWYER-CLIENT PRIVILEGE AND CONSENT TO DISCLOSURE

0971
#51

Page 4	SHERIFF'S DEPARTMENT	Case Number 03-5670
	Santa Barbara County	
	CONTINUATION SHEET	
<small>(A) LIST CONTINUATION. (B) DESCRIBE: PHYSICAL EVIDENCE, LOCATION FOUND & DISPOSITION. (C) NARRATIVE. (D) CASE DISPOSITION</small>		

1 5. I understand that written and oral communications between me and my
2 children and a lawyer who has agreed to provide legal advice to us and to represent us
3 and protect our interests, which communications are intended by me, my children and
4 that lawyer to be made in confidence in the course of that relationship, are privileged
5 from disclosure to any third party except where reasonably necessary for the
6 transmission of the information or the accomplishment of the purpose for which the
7 lawyer is consulted.

8 7. To the extent any lawyer I and my children consulted concerning any aspect
9 of my dispute with [REDACTED] and/or concerning MICHAEL JACKSON or
10 BRAD MILLER believes that my communications and my children's communications
11 with him or her concerning any of those matters are protected by the "lawyer-client"
12 privilege and that he or she must therefore assert and claim the lawyer-client privilege
13 on my behalf and on behalf of my children, I HEREBY AUTHORIZE, FOR MYSELF
14 AND FOR EACH OF MY MINOR CHILDREN, each and every one of those lawyers,
15 including the lawyers listed by name above, to make full disclosure of those
16 communications (including transcripts of all depositions of me and any one or more of
17 my children) to the Sheriff of Santa Barbara County and his duly-appointed deputies
18 and investigators and to the District Attorney of Santa Barbara County and his duly-
19 appointed deputies and investigators, upon the request of any of them accompanied
20 by a signed copy of this Waiver and Consent.

21 DATED: December 16, 2003

22 [REDACTED]
23 [REDACTED]
24 [REDACTED]

25
26
27
28

6972

PROOF OF SERVICE

1013A(1)(3), 1013(c) CCP

STATE OF CALIFORNIA, COUNTY OF SANTA BARBARA:

I am a citizen of the United States of America and a resident of the county aforesaid. I am employed by the County of Santa Barbara, State of California. I am over the age of 18 and not a party to the within action. My business address is 312-H East Cook Street, Santa Maria, California.

On NOVEMBER 15, 20 04, I served a copy of the attached ORDER FOR RELEASE OF REDACTED DOCUMENTS (EXHIBITS 20, 21, 22, 34, 35, 36,, 44 AND 51 FROM PEN. C § 1538.5) (PARTS 1 AND 2) addressed as follows:

THOMAS A. MESEREAU, JR.
COLLINS, MESEREAU, REDDOCK & YU, LLP
1875 CENTURY PARK EAST, 7TH FLOOR
LOS ANGELES, CA 90067

THOMAS W. SNEDDON, JR.
DISTRICT ATTORNEY'S OFFICE
1112 SANTA BARBARA STREET
SANTA BARBARA, CA 93101

 X FAX

By faxing true copies thereof to the receiving fax numbers of: (310) 861-1007 (Thomas Mesereau, Jr.); (805) 568-2398 (Thomas Sneddon), Said transmission was reported complete and without error. Pursuant to California Rules of Court 2005(i), a transmission report was properly issued by the transmitting facsimile machine and is attached hereto.

 MAIL

By placing true copies thereof enclosed in a sealed envelope with postage fully prepaid, in the United States Postal Service mail box in the City of Santa Maria, County of Santa Barbara, addressed as above. That there is delivery service by the United States Postal Service at the place so addressed or that there is a regular communication by mail between the place of mailing and the place so addressed.

 PERSONAL SERVICE

By leaving a true copy thereof at their office with the person having charge thereof or by hand delivery to the above mentioned parties.

 EXPRESS MAIL

By depositing such envelope in a post office, mailbox, sub-post office, substation, mail chute, or other like facility regularly maintained by the United States Postal Service for receipt of Express Mail, in a sealed envelope, with express mail postage paid.

I certify under penalty of perjury that the foregoing is true and correct. Executed this 15TH day of NOVEMBER, 20 04, at Santa Maria, California.


CARRIE L. WAGNER