

DEC 29 2004

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

1 THOMAS W. SNEDDON, JR., DISTRICT ATTORNEY
County of Santa Barbara
2 By: RONALD J. ZONEN (State Bar No. 85094)
Senior Deputy District Attorney
3 J. GORDON AUCHINCLOSS (State Bar No. 150251)
Senior Deputy District Attorney
4 GERALD McC. FRANKLIN (State Bar No. 40171)
Senior Deputy District Attorney
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Santa Barbara, CA 93101
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8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
9 **FOR THE COUNTY OF SANTA BARBARA**
10 **SANTA MARIA DIVISION**

11
12 THE PEOPLE OF THE STATE OF CALIFORNIA,
13 Plaintiff,

14 v.
15

16 MICHAEL JOE JACKSON,
17

18 Defendant.
19
20

No. 1133603

NOTICE OF MOTION AND
MOTION FOR ORDER
DIRECTING THAT SEARCH
WARRANT NO. SW 5135 AND,
THE DECLARATION IN
SUPPORT THEREOF (EXH. 1)
AND THE LIST OF ITEMS
SEIZED (EXH. 2) BE
CONDITIONALLY SEALED
AND REMAIN UNDER SEAL
UNTIL FURTHER ORDER OF
COURT; DECLARATION OF
GERALD McC. FRANKLIN IN
SUPPORT THEREOF;
MEMORANDUM OF POINTS
AND AUTHORITIES

12
DATE: January 13, 2005
TIME: 8:30 a.m.
DEPT: SM 2 (Melville)

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24 TO: MICHAEL JOE JACKSON, AND TO THOMAS A. MESEREAU and
25 ROBERT SANGER, HIS ATTORNEYS OF RECORD, AND TO THEODORE J.
26 BOUTROUS, JR., ESQ., GIBSON, DUNN & CRUTCHER, LLP:

27
28 PLEASE TAKE NOTICE that on January 13, 2005, at 8:30 a.m. or as soon

1 thereafter as the matter may be heard, in Department SM 2, Plaintiff will, and hereby does,
2 move for an order directing that the following records be maintained under conditional seal
3 until further order of court, pursuant to California Rules of Court, rule 243.1 et seq;

4 Warrant No. SW 5135 for the search of a certain residence, which
5 warrant was issued on September 9, 2004, together with its supporting
6 affidavit, (Exhibit 1 at the hearing of the Motion to Suppress Evidence
7 on October 7, 2004); and

8 The list of property obtained in the course of that search (Exhibit 2
9 at the hearing)

10 The motion will be made on the ground that the facts, as established by the
11 accompanying declaration of Gerald McC. Franklin, are sufficient to justify sealing the
12 specified records pursuant to California Rules of Court, rule 243.1 et seq.

13 The motion will be based on this notice of motion, on the declaration of Gerald
14 McC. Franklin and the memorandum of points and authorities served and filed herewith, on the
15 records and the file herein, and on such evidence as may be presented at the hearing of the
16 motion.

17 DATED: December 28, 2004

18 THOMAS W. SNEDDON, JR.
19 District Attorney

20 By: 
21 Gerald McC. Franklin, Senior Deputy

22 Attorneys for Plaintiff
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DECLARATION OF GERALD McC. FRANKLIN

1, Gerald McC. Franklin, say:

1. I am a lawyer admitted to practice in the State of California. I am a Senior Deputy of the District Attorney of Santa Barbara County. I am one of the lawyers of record for the People, Plaintiff in this action.

2. This motion to seal records pertains to warrant no. SW 5135 for the search of a certain residence, together with the supporting affidavit (received as Exhibit 1 at the hearing on October 7, 2004 of defendant's motion to suppress the resulting evidence) and the itemized list of property seized in the course of the search, dated September 15, 2004 (Exhibit 2 at the hearing).

3. The warrant was issued on September 9, 2004, and was conditionally sealed. The Court has separately dealt with the sealing of that warrant, its supporting affidavit and the return thereto. The Court has requested that the same documents, offered as Exhibits 1 and 2 at the hearing of defendant's motion to suppress the evidence resulting from the search, likewise be sealed and that a proposed redacted version of each be submitted.

4. The information set out in the affidavit in support of SW 5135 expands upon the confidential information gained by investigators in the course of the ongoing investigation, set out in the original warrant for the search of Neverland Ranch, most of which was sealed by order of this Court pending trial in order to preserve the right of both parties to a fair trial, and in subsequent warrants issued in furtherance of that investigation. In addition, the affidavit makes reference to information gathered by investigators following execution of the warrant for the Neverland Ranch search, which they regard as confidential and which would be prejudicial to defendant's right to a fair trial if disclosed to the public prior to trial and while the investigation itself is still underway.

5. Some of the items of property seized in the course of the search may constitute evidence discussion of which prior to trial may prejudice the right of the parties to a fair trial before an unbiased jury.


6. I believe the information set out in the affidavit for the warrant is privileged

1 information within the meaning of Evidence Code sections 1040, subdivision (a) and 1042,
2 subdivision (b), and as information relating to the investigation of alleged child molestation
3 offenses, it may also be privileged pursuant to the Child Abuse and Neglect Reporting Act,
4 Penal Code sections 11164 through 11174. I hereby claim and assert that privilege.

5 7. I therefore believe that the interest in a fair trial overrides the public's prompt
6 access to Exhibits 1 and 2 and supports the sealing of those exhibits until the investigation has
7 been concluded.

8 8. I believe an order maintaining those exhibits under seal in the interim would
9 avert the probability of prejudice, and that no more narrowly tailored order with respect to
10 those records could be drafted to achieve the overriding interest in a fair trial.

11 I declare under penalty of perjury under the laws of California that the foregoing is
12 true and correct, except as to matters stated upon my information and belief, and as to such
13 matters I believe it to be true. I execute this declaration at Santa Barbara, California on
14 December 28, 2004.

15 
16 Gerald McC. Franklin

1 MEMORANDUM OF POINTS AND AUTHORITIES

2
3 The procedure for sealing records under California Rules of Court, rule 243.1 et seq.
4 applies only to records that are deemed public. (*Id.*, rule 243.1(a)(2).) Motions and responsive
5 pleadings in criminal cases and exhibits received in connection with the hearing thereof are,
6 ordinarily, "public" records of the court.

7 Rule 243.1(d) provides that

8 The court may order that a record be filed under seal only if it
9 expressly finds facts that establish:

10 (1) There exists an overriding interest that overcomes the right of
11 public access to the record;

12 (2) The overriding interest supports sealing the record;

13 (3) A substantial probability exists that the overriding interest will
14 be prejudiced if the record is not sealed;

15 (4) The proposed sealing is narrowly tailored; and

16 (5) No less restrictive means exist to achieve the overriding interest.

17 Rule 243.1(e) provides, in pertinent part:

18 (1) An order sealing the record must (i) specifically set forth the
19 facts findings that support the findings and (ii) direct the sealing of
20 only those documents and pages, or, if reasonably practicable,
21 portions of those documents and pages, that contain the material that
22 needs to be placed under seal. All other portions of each documents
or page must be included in the public file.

23 Rule 243.2(b) provides, in pertinent part, that "Pending the determination of the
24 motion [of a party to file a record under seal], the lodged record will be conditionally under
25 seal."

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1 Penal Code section 1534, subdivision (a) provides:

2 (a) A search warrant shall be executed and returned within 10 days
3 after date of issuance. A warrant executed within the 10-day period
4 shall be deemed to have been timely executed and no further
5 showing of timeliness need be made. After the expiration of 10
6 days, the warrant, unless executed, is void. The documents and
7 records of the court relating to the warrant need not be open to the
8 public until the execution and return of the warrant or the expiration
9 of the 10-day period after issuance. Thereafter, if the warrant has
10 been executed, the documents and records shall be open to the public
11 as a judicial record.

12 In *PSC Geothermal Services Co. v. Superior Court* (1994) 25 Cal.4th 1697, our
13 Supreme Court noted:

14 "Section 1534 provides that the documents associated with the
15 warrant are public documents 10 days after its execution. Typically
16 after the search, arrests are made. There is no exception in the
17 statute for instances, such as that here, where the search is used to
18 further an ongoing investigation. Such information, however, may
19 be privileged as official information under Evidence Code sections
20 1040, subdivision (a) and 1042, subdivision (b)." (*Id.*, at p. 1714.)

21 Evidence Code section 1040, subdivision (a) provides: "As used in this section,
22 'official information' means information acquired in confidence by a public employee in the
23 course of his or her duty and not open, or officially disclosed, to the public prior to the time the
24 claim of privilege is made."

25 Evidence Code section 1042, subdivision (b) provides: "Notwithstanding
26 subdivision (a) [requiring a court to make adverse findings adverse to the public entity upon
27 any issue in a court proceeding to which privileged information is material], where a search is
28 made pursuant to a warrant valid on its face, the public entity bringing a criminal proceeding is
not required to reveal to the defendant *official information* or the identity of an informer in
order to establish the legality of the search or the admissibility of any evidence obtained as a

1 result of it." (Emphasis added.)

2 The procedure for sealing records under California Rules of Court, rule 243.1 et seq.
3 applies only to records that are deemed public. (*Id.*, rule 243.1(a)(2).) Search warrants, their
4 supporting affidavits and the returns thereto are open to the public within 10 days of issuance
5 or until the warrant is executed and returned, whichever is earlier. (Pen. Code, § 1534, subd.
6 (a).)

7 Rule 243.1(d) provides that

8 The court may order that a record be filed under seal only if it
9 expressly finds facts that establish:

10 (1) There exists an overriding interest that overcomes the right of
11 public access to the record;

12 (2) The overriding interest supports sealing the record;

13 (3) A substantial probability exists that the overriding interest will
14 be prejudiced if the record is not sealed;

15 (4) The proposed sealing is narrowly tailored; and

16 (5) No less restrictive means exist to achieve the overriding interest.

17 Rule 243.1(c) provides, in pertinent part:

18 (1) An order sealing the record must (i) specifically set forth the
19 facts findings that support the findings and (ii) direct the sealing of
20 only those documents and pages, or, if reasonably practicable,
21 portions of those documents and pages, that contain the material that
22 needs to be placed under seal. All other portions of each documents
or page must be included in the public file.

23 Rule 243.2(b) provides, in pertinent part, that "Pending the determination of the
24 motion [of a party to file a record under seal], the lodged record will be conditionally under
25 seal."

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27 ////

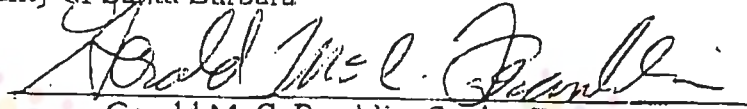
28 ////

1 DATED: December 28, 2004

2 Respectfully submitted,

3 THOMAS W. SNEDDON, JR., DISTRICT ATTORNEY
4 County of Santa Barbara

5 By:



6 Gerald McC. Franklin, Senior Deputy

7 Attorneys for Plaintiff

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PROOF OF SERVICE

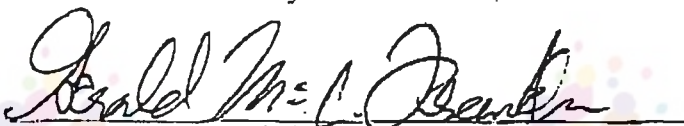
STATE OF CALIFORNIA }
COUNTY OF SANTA BARBARA } SS

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 December 28, 2004, I served the within NOTICE OF MOTION AND MOTION FOR ORDER DIRECTING THAT SEARCH WARRANT NO. SW 5135 AND ITS SUPPORTING AFFIDAVIT (Exh. 1) AND THE ITEMIZED RETURN THERETO (Exh. 2) BE MAINTAINED UNDER CONDITIONAL SEAL UNTIL FURTHER ORDER OF COURT; DECLARATION OF GERALD McC. FRANKLIN; MEMORANDUM OF POINTS AND AUTHORITIES and PROPOSED ORDER and PROPOSED REDACTION THEREOF on Defendant, by THOMAS A. MESEREAU, JR. and ROBERT SANGER (and a copy the motion but NOT the redacted copies of the documents on counsel for Media) by transmitting a true copy thereof by fax to counsel and then causing to be mailed a true copy to each counsel at the address shown on the attached Service List.

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

Executed at Santa Barbara, California on this 28th day of December, 2004.


Gerald McC. Franklin

STATE OF CALIFORNIA - COUNTY OF SANTA BARBARA
SANTA BARBARA JUDICIAL DISTRICT

**SEARCH WARRANT AND AFFIDAVIT
(AFFIDAVIT)**

I, **Detective Craig Bonner**, swear under oath that the facts expressed by me in the attached and incorporated statement of probable cause are true and that based thereon I have probable cause to believe and do believe that the property described below is lawfully seizable pursuant to Penal Code Section 1524, as indicated below, and is now located at the location set forth below. Wherefore, affiant requests that this Search Warrant be issued.

/s/ Craig Bonner

(Signature of Affiant)

NIGHT SEARCH REQUESTED: YES () NO (X)

(SEARCH WARRANT)

THE PEOPLE OF THE STATE OF CALIFORNIA TO ANY SHERIFF, POLICEMAN OR PEACE OFFICER IN THE COUNTY OF SANTA BARBARA: proof by affidavit having been made before me by **Detective Craig Bonner**, that there is probable cause to believe that the property described herein may be found at the locations set forth herein and that it is lawfully seizable pursuant to Penal Code Section 1524, in that it tends to show that a felony has been committed or that a particular person has committed a felony,

YOU ARE THEREFORE COMMANDED TO SEARCH [REDACTED]

[REDACTED], State of California, the location is further described as a single story building with yellow stucco and wood siding and white wood trim around windows and doors. The numbers, [REDACTED] are affixed to the trim above the entry to the residence and are painted on the curb in front of the residence, including all rooms, attics, basements, and other parts therein, any locked item located inside or outside; the surrounding grounds; any garages, storage rooms or sheds, trash containers, or outbuildings of any kind located thereon; also to include any and all vehicles in control of, or associated with the persons or locations to be searched.

For the following documentation: Refer to Attachment 'A'

AND TO SEIZE IT IF FOUND and keep it in your custody until further order of court. This Search Warrant and incorporated Affidavit was sworn to as true and subscribed before me this 9th day of September, 2004, at 2:45 A.M./P.M. Wherefore, I find probable cause for the issuance of this Search Warrant and do issue it.

/s/ Rodney J. Melville

(Signature of Magistrate)

NIGHT SEARCH APPROVED: YES () NO (X)

Judge of the Santa Barbara Superior Court, Santa Maria Division

Warrant page 1

ATTACHMENT "A"

Property to be seized:

1. Any written, typed or printed documentation, which tends to show the activities [REDACTED].
2. Computers and computer media including computer including central processing units (CPUs), hard disk drives, floppy disk drives, tape drives, removable media drives, optical/CD-ROM drives, servers, workstations, display screens, input devices (including but not limited to keyboards, mice, and trackballs), printers, modems, peripherals, floppy disks, magnetic tapes, cassette tapes, removable storage media, and/or optical/CD-ROM disks or cartridges, found together or separately from one another.
3. Articles of personal property tending to establish the identity of persons in control of the premises or vehicle to be searched, including the following: utility company receipts, rent receipts, canceled mail envelopes, and keys; and if you find the same or any part thereof, to retain the same in your custody subject to order of court as provided by law.

All items listed on this attachment "A" of this Search Warrant which are identified as being a computer and/ or computer media may be returned to the owner, after the law enforcement agency seizing the property makes forensic copies of the items, without the necessity of any further court orders.

STATEMENT OF PROBABLE CAUSE

Identification and Expertise of Affiant:

Your Affiant, Craig Bonner has been regularly employed by the Santa Barbara County Sheriff's Department for over ten years. Your Affiant has worked as a peace officer in the State of California for the same period. During this time period, your Affiant has investigated hundreds of various offenses including murder, robbery, burglary, theft, assault, narcotic and drug violations, sex crimes, physical and sexual child abuse, and traffic investigations. As the result of these investigations, your Affiant has made hundreds of arrests for the various crimes.

Your Affiant attended a level two and three reserve police academy at Allan Hancock College. Your Affiant also attended the basic law enforcement training academy while employed by the Santa Barbara County Sheriff's Department. Your Affiant possesses the Basic and Intermediate P.O.S.T. Certificates, and regularly attends in-service training.

Your Affiant attended a 28 hour training seminar on the investigation of property and financial crimes. This seminar included instruction blocks on credit card fraud, Identity Theft and Internet fraud. I have also attended a 32 hour Internet Crimes class and a 36 hour High Technology and Computer Crimes Investigation class. Since assuming my current assignment as a detective, I have personally investigated in excess of one hundred property/ financial crime cases.

Your Affiant is currently assigned to the Criminal Investigations Division, as a detective, and have acted and received the information set forth in this declaration in that capacity.

Statement of Probable Cause:

Summary:

Your Affiant seeks judicial approval to search the residence of [REDACTED] for the presence of physical documentation and digital documentation, which will assist investigators in determining [REDACTED]. SBSO investigators obtained evidence and received information indicating this documentation is present at [REDACTED].

Background information:

Your Affiant and other Sheriff's detectives are currently investigating allegations of child molestation and other charges against Michael Joe Jackson. Your Affiant has read the search warrant and affidavit executed on November 17, 2003 in support of a search warrant (No. SW 8844686) for Neverland Ranch, the residence of Hamid Moslehi in West Hills (Los Angeles County) and the office of Bradley Miller, a private investigator in Beverly Hills, California and is incorporating this information within this statement of probable cause by this reference. Additionally, SBSO investigators have authored a number of search warrants subsequent to the

Warrant page 3

above mentioned warrants. Your affiant either personally authored, assisted in the authoring of, or read each of the statements of probable cause for the subsequent warrants. Your affiant wishes to incorporate the information contained within the probable cause statements for these earlier warrants into this current statement of probable cause by this reference.

During this investigation, your Affiant and other investigators contacted numerous witnesses, who provided information based on their personal knowledge and/or documentation. This information has corroborated information derived from the victim in this investigation.



New information:

Throughout this investigation, SBSO investigators received information from various sources



During the service of the search warrant at Neverland Ranch on 11-18-2003, SBSO investigators located evidence indicating



During this investigation, SBSO investigators received information from a Confidential Reliable Informant (CRI), who stated Michael JACKSON told the CRI that he (JACKSON)



It should be noted this CRI provided information to SBSO investigators on prior occasions. On these prior occasions, the information provided by the CRI was found to be true, through evidence and/ or statements of other witnesses.

During this investigation, SBSO investigators learned Michael JACKSON



This search warrant was reviewed, approved and signed by Judge Rodney Melville. The warrant was later served on

In reviewing the records, SBSO investigators found entries

Your affiant previously authored search warrants seeking to obtain financial information pertaining to Michael JACKSON. Your affiant found

It is also your affiant's experience that

It is your Affiant's training and experience that businesses and private individuals oftentimes utilize computer

On 8-31-2004, Detective Victor Alvarez went to

Detective Zelis and your affiant located numerous items of documentation indicating

Warrant page 5

During the service of a search warrant at [REDACTED] SBSO investigators located and seized computer evidence. Of interest, one of the computers had a contact entry for [REDACTED]

It is your Affiant's training and experience that when a person deletes a file on a computer, the data contained within the file is not erased from the hard drive. Through the use of computer forensic programs (such as Encase), this "deleted" file and/ or its content can be recovered after the fact. Furthermore, this fact is not commonly known by end users of computers and as such, few people utilize the measures necessary to ensure the files and their content cannot be recovered.

It is your Affiant's training and experience, computer systems commonly consist of computer hardware, software, and data, including central processing units (CPUs), hard disk drives, floppy disk drives, tape drives, removable media drives, optical/CD-ROM drives, servers, workstations, display screens, input devices (including but not limited to keyboards, mice, and trackballs), printers, modems, peripherals, floppy disks, magnetic tapes, cassette tapes, removable storage media, and/or optical/CD-ROM disks or cartridges, found together or separately from one another. More powerful computer systems may include multiple computers connected together, including workstations and servers.

Your Affiant believes that some of the information sought to be searched/seized may be contained on computers and/or separate (or "loose") "computer media" (e.g., floppy disks, optical, or other removable storage media, CD-ROM disks, cartridges, or tapes). Searching the subject's computer and separate computer media to the degree necessary to discover all information stored within that computer or media which is encompassed by the warrant requested in this case would be difficult and would risk destruction of evidence. It would be difficult to perform a thorough search of the subject's computer at the scene because investigators may not be familiar with the operating system used on that computer. Because of this, the best practice is to conduct the examination of the computers and computer media in a controlled lab setting.

It is your Affiant's desire to minimize the potential impact upon the operations of MJJ productions by not seizing the actual computers [REDACTED]. I therefore request permission and authorization from the court to have SBSO High Technology Crimes detectives make forensic copies of the computer hard drives [REDACTED]. This method is often used and sought after in "business"-type atmospheres where total seizure and removal of computers and computer media for further examination could ultimately be detrimental to the solvency of the business. These "duplicate-originals" can later be examined in a controlled lab setting without undue interruption of the normal operation of the business.

Request to release any computer equipment without further court order:

If it becomes necessary to seize the computers (due to logistical and/ or technical issues) from [REDACTED], the computers and computer media will be forensically copied at the SBSO High Technology Crimes lab as soon as possible. If this is the case, your affiant requests judicial permission to return the computers [REDACTED] without need for further court orders. This will assist in minimizing the potential negative impact upon the operations [REDACTED]

Warrant page 6

Summary:

Your Affiant believes a search of [REDACTED] will result in the location and seizure of physical documentation and digital information, which will assist investigators in their attempts to establish [REDACTED]. Investigators received information and recovered evidence indicating [REDACTED]. Furthermore, [REDACTED] SBSO investigators obtained recent documentation corroborating this information. Investigators are attempting to limit the reach of this warrant to documentation pertinent to the [REDACTED] time frame.

Warrant Mechanics:

Your Affiant commenced the actual physical mechanics of preparing this affidavit and attached search warrant at 10:00 A.M. on September 7, 2004; and your affiant affixed his signature under oath to this affidavit before the undersigned magistrate at the time and date attested by said magistrate; the elapsed time reflected herein has been diligently utilized by your affiant in the mechanics of physically preparing these documents, located and consulted with Deputy District Attorney Gerald Franklin of the County of Santa Barbara, in reference to the aforementioned preparation; locating the appropriate magistrate; and transporting these documents to the magistrate for his official action in connection therewith.

1. OFFENSE/CLASSIFICATION
288(a) PC - Sex
offense or lewd act
against a child

SHERIFF'S DEPARTMENT
SANTA BARBARA COUNTY
PROPERTY FORM

2. CASE NUMBER
03-5670

2a. Attach
to report
Yes

4. VICTIM/COMPLAINANT
CONFIDENTIAL

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

6. DATE/TIME OF REPORT
09-15-04 @ 1035 hours

7. CONT. TO TYPE OF RPT FORM
Offense

PAGE #Prop-1 OF Prop-1

Q. ITEM #	10. ITEM	11. SERIAL NUMBER	12. MANUFACTURER	13. DESCRIBE PROPERTY	14. PROPERTY TYPE CODE	15. VALUE	16. REFERENCE TAG NO.
1801	Computer Tower	[REDACTED]	Sony Vaio	Light gray and purple computer tower, Model RX380DS - found in main house by Det. Bonner	E	Unk.	122980
1802	PGA	Unk.	Sony Clio	Model PEG-[REDACTED] silver in color, including docking / charger station - found in main house by Det. Bonner	E	Unk.	122980
1803	Computer	[REDACTED]	Sony Vaio	Video audio integrated operation, Model W510G, silver in color - found in detached office by Det. Bonner	E	Unk.	122980
1804	Computer Tower	CN-[REDACTED]	Dell	Model Dimension 2400, black and grey in color - found in detached office by Det. Bonner	E	Unk.	122980
1805	Computer Tower	[REDACTED]	Sony Vaio	Model LX920, light grey and blue in color, found in detached office by Det. Bonner	E	Unk.	122980
1806	Folder		Labelled "Cell Phone Info"	Green filing folder containing miscellaneous paperwork. First page: M.J.I Productions / Nevehand telephone directory. Found in detached office, cabinet left of entrance, first (top) drawer by Lt. Kiapakis	E		122980

OPTIONAL DISTRIBUTION IS AUTHORIZED

TO: _____
BY: _____

ENTERED
3 DESKED

TT USE

YES

EMD/ELE SEED BY SEARCH WARRANT

110

1. OFFENSE CLASSIFICATION
200(a) PC - Sex
offense or lewd act
against a child

SHERIFF'S DEPARTMENT
SANTA BARBARA COUNTY
PROPERTY FORM

2. CASE NUMBER
03-5670

2a. attach
to report
Yes

PAGE #Prop-2 OF Prop-2

4. VICTIM COMPLAINT
CONFIDENTIAL

5. REPORTING OFFICER & BCOY #
Det. P. Zelis / 2167

6. DATE/TIME OF REPORT
01-15-04 @ 1035 hours

7. CONT. TO: TYPE OF RPT FORM
Offense

A. PRINT TYPE CODE: R-RECOVERED, S-STEAL, F-
FOLLOW-UP, L-LOST, E-EVIDENCE, D-UNDER OBSERVATION

ENTER F	10. ITEM	11. SERIAL NUMBER	12. BRAND NAME	13. DESCRIBE PROPERTY	14. REPORT TYPE CODE	15. VALUE	16. EVIDENCE TAG #1
1807	Folder		Labeled "Phone Business"	Green filing folder containing miscellaneous paperwork. First page: MJJ tax cover sheet. Found in detached office, cabinet left of entrance in 2 nd drawer by Lt. Klapakis	E		122980
1808	Folder		Labeled "Telephone List"	Green filing folder containing phone number print outs - Found in detached office, cabinet left of entrance in 2 nd drawer by Lt. Klapakis	E		122980
1809	Folder		Labeled "Mesereau"	Yellow folder containing paper work "Michael Jackson Tape Index" - Found in detached office, cabinet left of entrance in 2 nd drawer by Lt. Klapakis	E		122980
1810	Folder		Labeled "Mesereau"	Yellow folder w/ paperwork, [redacted] e-mail printouts - Found in detached office, cabinet left of entrance in 2 nd drawer by Lt. Klapakis	E		122980
1011	Folder		Labeled "Mesereau"	Purple folder w/ miscellaneous paperwork - First page: letter from [redacted] - Found in detached office, cabinet left of entrance in 2 nd drawer by Lt. Klapakis	E		122980

1. OFFENSE CLASSIFICATION
200(a) PC - Sex
offense or lewd act
against a child

SHERIFF'S DEPARTMENT
SANTA BARBARA COUNTY
PROPERTY FORM

2. CASE NUMBER
03-5670

2a. Attach
to report
Yes

PAGE #Prop-3 OF Prop-3

4. VICTIM/COMPLAINANT
CONFIDENTIAL

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

6. DATE/TIME OF REPORT
09-15-04 @ 1035 hours

7. CONT. TO: TYPE OF RPT KNOWN
Offense

6. PARTIAL TYPE CODE, RECOVERED & STORED J.
FOUND & LOST EVIDENCE, QUANTIFICATION

Q1 ITEM #	Q2 ITEM	Q3 SERIAL NUMBER	Q4 EVALUATION	Q5 DESCRIBE PROPERTY	Q6 PARTIAL TYPE CODE	Q7 IS VALUE	Q8 EVIDENCE TAG ID.
1012	Paperwork		MJJ Productions	Miscellaneous paperwork re; [REDACTED] Found in detached office, cabinet left of entrance in 3 rd drawer by Lt. Klapakis	E		122980
1013	Paperwork		MJJ Productions	Appearance consent and release, found in detached office, cabinet right of entrance in 2 nd drawer from top by Sgt. Robel	E		122980
1014	Incoming/ outgoing calls log book		Rediform	Dated [REDACTED] spiral bound book found in detached office desk, left top drawer by Det. Bonner	E		122980
1015	Incoming/ outgoing calls log book		Rediform	Dated [REDACTED] spiral bound book found in detached office desk, left top drawer by Det. Bonner	E		122980
1016	Incoming/ outgoing calls log book		Rediform	Dated [REDACTED] spiral bound book found in detached office desk, left top drawer by Det. Bonner	E		122980
1017	Single paper		Rediform	Single paper torn from above spiral book dated [REDACTED] and in detached office desk, left top drawer by Det. Bonner	E		122980
1018	Miscellaneous			Paperwork found on top of desk in detached office by Det. Bonner	E		122980
	Paperwork						

1. OFFENSE/CLASSIFICATION
288(a) PC - Sex
offense or lewd act
against a child

SHERIFF'S DEPARTMENT
SANTA BARBARA COUNTY
PROPERTY FORM

2. CASE NUMBER
03-5670

2a. Call to
to report
Yes

4. VICTIM COMPLAINT
CONFIDENTIAL

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

6. DATE/TIME OF REPORT
09-15-04 @ 1035 hours

7. CONT. TO: TYPE OF FRT FORM
Offense

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8. PROPERTY TYPE CODE: R-RECOVERED, S-STOLEN, F-
FOUND, L-LOST, E-EMBEZZLED, U-UNKNOWN, O-OBSERVATION

9. ITEM #	10. ITEM	11. SERIAL NUMBER	12. BRAND NAME	13. DESCRIBE PROPERTY	14. PROPERTY TYPE CODE	15. VALUE	16. EVIDENCE TAG NO.
1819	Day planner		MJJ Productions 2003	Black in color, day planner w/MJJ Productions logo Found in detached office desk by Det. Bonner	E		122980
1020	Single Payer			Dated 02-25-03 re: [redacted] found in stack of paper on floor behind [redacted] desk by Det. Bonner	E		122980
1821	Calendar Printout		MJJ Productions	Includes dates of [redacted] and [redacted] in stack of paperwork on floor behind [redacted] desk by Det. Bonner	E		122980
1822	Miscellaneous Papers			MJJ Productions and miscellaneous financial papers from [redacted] from box titled #8, file titled [redacted] found near [redacted] desk by Det. Bonner	E		122980
1823	Client Statements		[redacted]	Client statements for [redacted] account found in box #5 in storage unit next to [redacted] by Det. Alvarez	E		122980
1824	Rediform		Rediform Call Register	Incoming / Outgoing call register dated [redacted] found in storage unit next to [redacted] by Det. Alvarez	E		122980

1. OFFENSE/CLASSIFICATION
**280(a) PC - Sex
offense or lewd act
against a child**

SHERIFF'S DEPARTMENT
SANTA BARBARA COUNTY
PROPERTY FORM

2. CASE NUMBER
03-5670

2a. attach
to report
YES

4. VICTIM/COFFICER/ARREST
CONFIDENTIAL

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

5. DATE/TIME OF REPORT
09-15-04 @ 1035 hours

7. CONT. TO: TYPE OF RPT FORM
Offense

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8. ITEM #	10. ITEM	11. SERIAL NUMBER	12. BRAND NAME	13. DESCRIBE PROPERTY	14. PROPERTY TYPE CODE (1=PROPERTY, 2=LOST, 3=SEIZED, 4=UNKNOWN, 5=OTHER)	15. VALUE	16. EVIDENCE TAG #
1825	Rediform		Rediform Call Register	Incoming / Outgoing call register dated [REDACTED] and in storage unit next to [REDACTED] Det. Alvarez	E		122980
1826	Miscellaneous Papers		[REDACTED]	Client statements for [REDACTED] account found in box 7 in storage shed by Det. Alvarez	E		122980
1027	Paperwork		MJJ Productions	Messages to Jackson found in main residence office cabinet top drawer, by Det. Zelis	E		122980
1020	Video Cassette		Sony	One (1) mini DV Video cassette containing footage of [REDACTED]	E		122980
1029	CD-R			One (1) CD-R computer media storage disk containing the audio recorded initial contact [REDACTED]	E		122980