

FILED
SUPERIOR COURT of CALIFORNIA
COUNTY of SANTA BARBARA

MAR 26 2004

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

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

PEOPLE OF THE STATE OF CALIFORNIA,
Plaintiff,
vs.
MICHAEL JOE JACKSON,
Defendant.

Case No.: 1133603

ORDER FOR RELEASE OF REDACTED
DOCUMENTS

The most recent search warrant materials, previously placed conditionally under seal by order of this court, shall be released from seal and placed in the public file in the redacted form in which they are attached to this Order.

DATED: MAR 25 2004

Rodney S. Meville
RODNEY S. MEVILLE
Judge of the Superior Court

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 believe there is probable cause to believe, and I 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 locations set forth below. Wherefore, affiant requests that this Search Warrant be issued.

[Handwritten Signature]

(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 was used as the means of committing a felony, or is possessed by a person with the intent to use it as a means of committing a public offense or is possessed by another to whom he or she may have delivered it for the purpose of concealing it or preventing its discovery, or 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:

US Bank,

This is

for the following described property: Any and all documentation pertaining to the account holder/s (including application forms, current account holder personal/ business information, signature cards and any other information and/or documentation possessed by US Bank, which could be used to accurately identify persons owning and/or using the account in question, copies of detailed statements documenting activity (including all deposits, withdrawals and transfers of money) involving the account

If original checks are not maintained, then photocopies or microfiche images of the checks (front and back),.

Pertaining to US Bank account numbers and or names:

AND TO SEIZE IT IF FOUND and keep it in your custody pending further order of this Court. This Search Warrant and incorporated Affidavit was sworn to as true and subscribed before me this 18th day of February, 2004, at 8:20 a.m./p.m.

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

[Handwritten Signature]

(Signature of Magistrate)

NIGHT SEARCH APPROVED: YES () NO ()

Judge of the Santa Barbara Superior Court, Santa Maria Division



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, 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 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 40 hour Child Abuse and Sex Crimes class. I have also attended a 32 hour Internet Crimes class and a 36 hour High Technology and Computer Crimes Investigation class.

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

Statement of Probable Cause:

Your Affiant and other Sheriff's detectives are currently investigating allegations of child molestation against Michael Jackson. Your Affiant is familiar with the allegations of fact provided by Detective Paul Zelis in his declaration in support of a warrant for the search of Neverland Ranch and two other locations that was executed on November 18, 2003. Your Affiant incorporates Detective Zelis's declaration in this declaration by this reference. Furthermore, your Affiant authored a search warrant and statement of

In summary, your Affiant believes Sheriff's detectives will recover evidence that will further this investigation if a warrant is authorized for the seizure of the records of US Bank for account numbers

This is based on the following:

1. Throughout the investigation, SBSD investigators received information via the statements of various witnesses, to establish
2. Your Affiant and other SBSD investigators seized documents from residence,

, as opposed to
documentation obtained directly from the banking institution.

Your Affiant believes he has reasonable cause to believe that grounds for the issuance of a search warrant exist, as set forth in Section 1524 of the Penal Code, based upon the aforementioned, information, facts and circumstances.

Property to be seized: Any and all documentation pertaining to US Bank account

including application forms, current account holder personal/ business information, signature cards and any other information and/or documentation possessed by US Bank which could be used to accurately identify persons owning and/or using the accounts in question. Copies of detailed statements documenting activity (including all deposits, withdrawals and transfers of money) involving the account

Any and all original checks cashed against the account
(the extra time, to allow time for outstanding checks to be cashed and processed by the bank). If original checks are not maintained, then we request photocopies or microfiche images of the checks (front and back),.

Warrant Mechanics:

Your affiant commenced the actual physical mechanics of preparing this affidavit and attached search warrant at 10:00 A.M. on February 10, 2004; and your Affiant affixed his signature under oath to this affidavit before attaching a true copy of it to an e-mail communication with Magistrate Rodney S. Melville, at the time and date attested by Magistrate Melville on his copy of the Affidavit. The elapsed time reflected herein has been diligently utilized by your affiant in the mechanics of physically preparing these documents, locating and consulted with Senior Deputies District Attorney Gerald McC. Franklin and Ronald Zonen of the County of Santa Barbara, in reference to the aforementioned preparation; locating Magistrate Melville; and conveying these documents to Magistrate Melville for his official action in connection therewith.

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

**SEARCH WARRANT AND AFFIDAVIT
(AFFIDAVIT)**

I, Detective Paul Zelis, 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 believe there is probable cause to believe, and I 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 locations set forth below. Wherefore, affiant requests that this Search Warrant be issued.

Paul Zelis

(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 Paul Zelis, 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 was used as the means of committing a felony, or is possessed by a person with the intent to use it as a means of committing a public offense or is possessed by another to whom he or she may have delivered it for the purpose of concealing it or preventing its discovery, or 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:

or the following described documentation: Any and all documentation held, or stored by

AND TO SEIZE IT IF FOUND and keep it in your custody pending further order of this Court. This Search Warrant and incorporated Affidavit was sworn to as true and subscribed before me this 4th day of March, 2004, at 7:30 a.m./p.m.

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

FILED
SANTA BARBARA
SUPERIOR COURT

MAR 04 2004

Arday S. Melville

(Signature of Magistrate)

NIGHT SEARCH APPROVED: YES () NO (X)

Judge of the Santa Barbara Superior Court, Santa Maria Division

GARY M. BLAIR
Executive Officer

By: *Lorna Frey*
LORNA FREY Deputy Clerk

Identification and Expertise of Affiant:

Your Affiant, Paul Zelis, has been regularly employed as a law enforcement officer by Santa Barbara County for ten years. Your Affiant started his career with the Santa Barbara County Marshal's Office in May of 1993. He became a Sheriff's Deputy with the County of Santa Barbara in late 1996 when the Marshal's Office consolidated with the Sheriff's Department. During this time period, your Affiant has investigated numerous property crimes and crimes against persons, including burglary, theft, assault, domestic violence, narcotic and drug violations. As a result of these investigations, your Affiant has made hundreds of arrests for the various crimes.

Your Affiant has attended the basic law enforcement training academy and possesses the Basic and Intermediate P.O.S.T Certificates. Your Affiant has attended specialized courses, including Homicide Investigation (80 hr.), and Sexual Assault Investigation (40 hr.). Your Affiant attends regular in-service training.

Your affiant has been a detective for the past two years with the Criminal Investigations Division, and has acted and received the information set forth in this declaration in that capacity.

Statement of Probable Cause:

Your Affiant and other Sheriff's detectives are currently investigating allegations of child molestation against Michael Jackson. The affidavit executed on November 17, 2003 in support of a search warrant (No. SW 8844686) for Neverland Ranch, the residence of _____ in _____ (Los Angeles County) and the office of Bradley Miller, a private investigator in Beverly Hills, California is incorporated in this affidavit 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. Part of

~~My~~our Affiant believes he has reasonable cause to believe that grounds for the issuance of a search warrant exist, as set forth in Section 1524 of the Penal Code, based upon the aforementioned, information, facts and circumstances.

Documentation to be seized:

Any and all documentation held, or stored by

Warrant Mechanics:

Your Affiant first commenced the actual physical mechanics of preparing this affidavit and attached search warrant at 04:30 P.M. on March 3, 2004. This affidavit has been under continual revision since then as additional information comes to light. Your Affiant affixed his signature under oath to this affidavit before Magistrate Rodney S. Melville at the time and date attested by him. The elapsed time reflected herein has been diligently utilized by your Affiant in the mechanics of physically preparing these documents, consulting with District Attorney Tom Sneddon of the County of Santa Barbara and Senior Deputy District Attorney Gerald Franklin in reference to the aforementioned preparation and in transporting these documents to Magistrate Rodney S. Melville for his official action in connection therewith.

IN THE SUPERIOR COURT OF THE SANTA BARBARA JUDICIAL DISTRICT,
COUNTY OF SANTA BARBARA, STATE OF CALIFORNIA

STATE OF CALIFORNIA }

COUNTY OF SANTA BARBARA }

ss.

INVENTORY RETURN
OF SEARCH WARRANT

The following property was seized from
California.

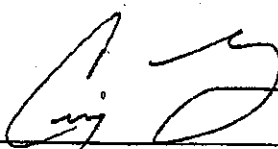
Refer to the attached SH-451 Property Forms (4 pages)

by virtue of a search warrant dated March 2, 2004, and executed by Judge Melville of the
above entitled court. Search Warrant No. 4946.

I, Craig Bonner, by whom this warrant was executed do swear, under penalty of perjury,
that the above inventory contains a true and detailed account of all records/documentation
taken by me under the warrant.

All of the records taken by virtue of said warrant will be retained in my custody subject to
the order of this court or of any other court in which the offense in respect to which the
records, are triable.

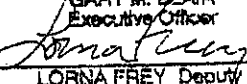
Executed this 8th day of March, 2004.



Craig Bonner, Detective
Criminal Investigations Division
Santa Barbara County Sheriff's Department

FILED
SANTA BARBARA
SUPERIOR COURT

MAR 11 2004

GARY M. BLAIR
Executive Officer
By: 
LORNA FREY Deputy Clerk

H _____
K _____
V _____
CC _____
CA _____
AC _____
SR _____
AP _____
DOC _____
ST _____

SHERIFF'S DEPARTMENT

SANTA BARBARA COUNTY PROPERTY FORM

SW #4946

2. CASE NUMBER

03-5670

2a. attach
to report

4. VICTIM/COMPLAINANT

*** Confidential ***

5. REPORTING OFFICER & BODY #

Det. C. Bonner 2474

6. DATE/TIME OF REPORT

03-08-04 @ 1030 hours

PAGE # Prop-1 OF Prop-1

7. CONT. TO: TYPE OF RPT FORM

Offense/ Arrest

9. ITEM #	10. ITEM	11. SERIAL NUMBER	12. BRAND NAME	13. DESCRIBE PROPERTY	8. PRPTY TYPE CODE: R-RECOVERED, S-STOLEN, F-FOUND, L-LOST, E-EVIDENCE, O-UNDER OBSERVATION		
					14. PRPTY TYPE CODE	15. VALUE	16. EVIDENCE TAG NO.
1701	Hard Drive	WNA8C3085385	Western Digital	Fire wire hard drive & power cable in white box titled "Dazzle & Cables"	E		122980
1702	Mini DV's	DNA	Maxell & Sony	(5) five total mini DV's found in white plastic "Mirage" bag	E		122980
1703	CD-R's	DNA	Various	(29) twenty nine CD-R's w/in a black case found in "Mirage" bag	E		122980
1704	Floppy Disk		Imation	one 3 1/2" floppy, 1.4 MB found in "Mirage" bag	E		122980
1705	Palm Corder	B2MA11163	Panasonic	Model PV-DV102D Mini DV recorder - unk. If contains a tape has 128 MB card in camera in black carry case	E		122980
1706	Computer	T13052B20064	Unknown	Small purple/gray computer in pieces, has hard drive installed in box titled	E		122980

EXCEPTIONAL DISTRIBUTION IS AUTHORIZED

TO:

ENTERED
INDEXED

TT USE

YES

EVIDENCE SEIZED BY SEARCH WARRANT
NO

SH-431A (MPROPERTY.DOT) REV. 3/1/2004 11:53:06-01 10:00 HRS 2474 03-5670 PROP Steward warrant II 5:03:0604 01:00 PM

SW #4946

DECLARATION
SANTA BARBARA COUNTY
PROPERTY FORM

2. CASE NUMBER
03-5670

2a. attach
to report

4. VICTIM/COMPLAINANT
***** Confidential *****

5. REPORTING OFFICER & BODY #
Det. C. Bonner 2474

6. DATE/TIME OF REPORT
03-08-04 @ 1030 hours

PAGE #**Prop-2** OF **Prop-2**

7. CONT. TO: TYPE OF RPT FORM
Offense/ Arrest

9. ITEM #	10. ITEM	11. SERIAL NUMBER	12. BRAND NAME	13. DESCRIBE PROPERTY	14. PRPTY TYPE CODE	15. VALUE	16. EVIDENCE TAG NO.
1707	CD-R's		Various	(13) thirteen CD-R's found in box marked	E		122980
1708	Zip Disks		lomega	(6) six zip disks found in box marked	E		122980
1709	Indicia			Self storage lease contract: "Mirage" bag	E		122980
1710	Computer Media		Unknown	(18) eighteen mini CD type disks found in box	E		122980
1711	Floppy Disks		Memorex & IBM	(20) twenty, 3 1/3" floppy, 1.4 mb found in box	E		122980
1712	CD-R's		Unknown	(7) seven CD-R's within a hard case, found in box	E		122980

8. PRPTY TYPE CODE: R-RECOVERED, S-STOLEN, F-FOUND, L-LOST, E-EVIDENCE, O-UNDER OBSERVATION

SHERIFF'S DEPARTMENT
SANTA BARBARA COUNTY
PROPERTY FORM

SW #4946

2. CASE NUMBER
03-5670

2a. attach
to report

4. VICTIM/COMPLAINANT
***** Confidential *****

5. REPORTING OFFICER & BODY #
Det. C. Bonner 2474

6. DATE/TIME OF REPORT
03-08-04 @ 1030 hours

7. CONT. TO: TYPE OF RPT FORM
Offense/ Arrest

PAGE #Prop-3 OF Prop-3

9. ITEM #	10. ITEM	11. SERIAL NUMBER	12. BRAND NAME	13. DESCRIBE PROPERTY	14. PRPTTY TYPE CODE	15. VALUE	16. EVIDENCE TAG NO.
1713	DVD's		Unknown	two DVD's within hard case found in box	E		122980
1714	Computer Tower	K11903038	Unknown	Grey computer tower			
1715	Computer Tower	Unknown	Unknown	Dark grey computer (full) tower, Pentium 4 sticker	E		122980
1716	Computer Tower	Unknown	Unknown	Light grey full computer tower, Pentium 4 sticker, clear window side	E		122980
1717	Computer Tower	Unknown	Unknown	Tan w/ purple buttons, full computer tower	E		122980
1718	Computer Tower	98058	Unknown	Almond face computer tower, Celeron sticker	E		122980
1719	Computer Tower	Unknown	Unknown	Tan and grey computer tower	E		122980

8. PRPTTY TYPE CODE: R-RECOVERED, S-STOLEN, F-FOUND, L-LOST, E-EVIDENCE, O-UNDER OBSERVATION

SHERIFF'S DEPARTMENT
SANTA BARBARA COUNTY
PROPERTY FORM

SW #4946		2. CASE NUMBER 03-5670		2a. attach to report	
4. VICTIM/COMPLAINANT *** Confidential ***		5. REPORTING OFFICER & BODY # Det. C. Bonner 2474		6. DATE/TIME OF REPORT 03-08-04 @ 1030 hours	
PAGE #Prop-4 OF Prop-4		7. CONT. TO: TYPE OF RPT FORM Offense/ Arrest			
9. ITEM #	10. ITEM	11. SERIAL NUMBER	12. BRAND NAME	13. DESCRIBE PROPERTY	6. PRPTY TYPE CODE: R-RECOVERED, S-STOLEN, F-FOUND, L-LOST, E-EVIDENCE-O-UNDER OBSERVATION
1720	Computer Tower	Unknown	Unknown	Black full computer tower	14. PRPTY TYPE CODE E
1721	Documents			Documents pertaining to the rental of	15. VALUE 122980
					16. EVIDENCE TAG NO. 122980

IN THE SUPERIOR COURT OF THE SANTA BARBARA JUDICIAL DISTRICT,
COUNTY OF SANTA BARBARA, STATE OF CALIFORNIA

STATE OF CALIFORNIA }
COUNTY OF SANTA BARBARA } ss. INVENTORY RETURN
OF SEARCH WARRANT

The following property was obtained via S/W # 4953, located at

Five Hundred fifty four pages of documents

by virtue of a search warrant dated March 04, 2004, and executed by Judge Rodney S. Melville of the above-entitled court. Search Warrant No. 4953.

I, Paul Zelis, by whom this warrant was executed, do swear, under penalty of perjury, that the above inventory contains a true and detailed account of all records/documentation taken by me under the warrant.

All of the records taken by virtue of said warrant will be retained in my custody subject to the order of this court or of any other court in which the offense in respect to which the records, are triable.

Executed this 16th day of March, 2004.

FILED
SUPERIOR COURT of CALIFORNIA
COUNTY of SANTA BARBARA

MAR 19 2004

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

Paul Zelis
Paul Zelis, Detective
Criminal Investigations Division
Santa Barbara County Sheriff's Department

IN THE SUPERIOR COURT OF THE SANTA BARBARA JUDICIAL DISTRICT,
COUNTY OF SANTA BARBARA, STATE OF CALIFORNIA

FILED
SANTA BARBARA
SUPERIOR COURT

STATE OF CALIFORNIA

COUNTY OF SANTA BARBARA

ss.

INVENTORY RETURN 27 2004
OF SEARCH WARRANT

GARY M. BLAIR
Executive Officer
By: *Lorna Frey*
LORNA FREY Deputy Clerk

The following property was obtained via S/W # 4898, located at Celco Partnership dba
Verizon Wireless, Legal Compliance, 51 Chubb Way, Branchburg, NJ 08876, (908) 306-
4200, Fax (908) 203-5876

Two Hundred twenty nine (229) page mailed response

by virtue of a search warrant dated January 22, 2004, and executed by Judge Rodney S.
Melville of the above-entitled court. Search Warrant No. 4898.

F _____
K _____
V _____
CC _____
CA _____
AC _____
J _____
SR _____
AP _____
DOC
ST _____

I, Paul Zelis, by whom this warrant was executed, do swear, under penalty of perjury, that
the above inventory contains a true and detailed account of all records/documentation
taken by me under the warrant.

All of the records taken by virtue of said warrant will be retained in my custody subject to
the order of this court or of any other court in which the offense in respect to which the
records, are triable.

Executed this 23rd day of February, 2004.

Paul Zelis

Paul Zelis, Detective
Criminal Investigations Division
Santa Barbara County Sheriff's Department

IN THE SUPERIOR COURT OF THE SANTA BARBARA JUDICIAL DISTRICT,
COUNTY OF SANTA BARBARA, STATE OF CALIFORNIA

FILED
SANTA BARBARA
SUPERIOR COURT

STATE OF CALIFORNIA }
COUNTY OF SANTA BARBARA }

ss.

INVENTORY RETURN NB 27 2004
OF SEARCH WARRANT

GARY M. BLAIS
Executive Officer
By: *Lorna Frey*
LORNA FREY Deputy Clerk

The following property was obtained via S/W # 4897, located at Verizon California Inc.,
Legal Compliance, P.O. Box 1001, Mail Code TxD01613, San Angelo, TX 76902, (888)
483-2600, Fax (915) 949-6916

F _____
K _____
V _____
CC _____
CA _____
AC _____
J _____
SA _____
AP _____
DOC _____
ST _____

One Hundred Seventy Five (175) page mailed response

by virtue of a search warrant dated January 22, 2004, and executed by Judge Rodney S.
Melville of the above-entitled court. Search Warrant No. 4897.

I, Paul Zelis, by whom this warrant was executed, do swear, under penalty of perjury, that
the above inventory contains a true and detailed account of all records/documentation
taken by me under the warrant.

All of the records taken by virtue of said warrant will be retained in my custody subject to
the order of this court or of any other court in which the offense in respect to which the
records, are triable.

Executed this 23rd day of February, 2004.

Paul Zelis
Paul Zelis, Detective
Criminal Investigations Division
Santa Barbara County Sheriff's Department

IN THE SUPERIOR COURT OF THE SANTA BARBARA JUDICIAL DISTRICT,
COUNTY OF SANTA BARBARA, STATE OF CALIFORNIA

FILED
SANTA BARBARA
SUPERIOR COURT

STATE OF CALIFORNIA }

COUNTY OF SANTA BARBARA }

ss.

INVENTORY RETURN
OF SEARCH WARRANT FEB 27 2004

GARY M. BLAIR
Executive Officer
By: *Lorna Frey*
LORNA FREY Deputy Clerk

The following property was obtained via S/W # 4902, located at Cingular Wireless, Legal Compliance, 4420 Rosewood Dr., Pleasonton CA 94588, Fax (925) 227-4399

No records located

by virtue of a search warrant dated January 22, 2004, and executed by Judge Rodney S. Melville of the above-entitled court. Search Warrant No. 4902.

F ___
K ___
V ___
CC ___
CA ___
AC ___
J ___
SR ___
AP ___
DOC ___
BT ___

I, Paul Zelis, by whom this warrant was executed, do swear, under penalty of perjury, that the above inventory contains a true and detailed account of all records/documentation taken by me under the warrant.

All of the records taken by virtue of said warrant will be retained in my custody subject to the order of this court or of any other court in which the offense in respect to which the records, are triable.

Executed this 23rd day of February, 2004.

Paul Zelis
Paul Zelis, Detective
Criminal Investigations Division
Santa Barbara County Sheriff's Department

SHERIFF'S DEPARTMENT
Santa Barbara County

Request for Additional Time for Return

FILED
SANTA BARBARA
SUPERIOR COURT

FEB 27 2004

2-25-04

Judge Melvin,

Search Warrant No. S-4926
Date Issued: 2-18-2003

GARY M. BLAIR
Executive Officer
By: *Lorna Frey*
LORNA FREY Deputy Clerk

F _____
K _____
V _____
CC _____
CA _____
AC _____
J _____
SR _____
AP _____
DOC ✓
ST _____

In reference to the search warrant for the records of US Bank, which was served on 2-20-2003. On 2-25-2003, I was advised that US Bank is unable to provide the requested documentation/ records within the allotted 10-day time period to file a return.

An additional 21 days is requested to make the records available.

Craig Bonner
Craig Bonner, Detective
Criminal Investigations Division
Santa Barbara Co. Sheriff's Dept.

Date: 2-27-04

Reed S. Mitchell
Judge

IN THE SUPERIOR COURT OF THE SANTA BARBARA JUDICIAL DISTRICT,
COUNTY OF SANTA BARBARA, STATE OF CALIFORNIA

FILED
SANTA BARBARA
SUPERIOR COURT

STATE OF CALIFORNIA }

COUNTY OF SANTA BARBARA }

ss.

INVENTORY RETURN
OF SEARCH WARRANT MAR 04 2004

GARY M. BLAIR
Executive Officer
By: *Lopina Frey*
LOPINA FREY Deputy Clerk

The following property was obtained via S/W # 4901, located at Nextel Communications,
Legal Compliance, 333 South Inverness Drive, Englewood CO 80235, (303) 721-3400,
Fax (800) 784-1244

No records located

by virtue of a search warrant dated January 22, 2004, and executed by Judge Rodney S.
Melville of the above-entitled court. Search Warrant No. 4901.

F _____
K _____
V _____
CC _____
CA _____
AC _____
J _____
SR _____
AP _____
DOC
ST _____

I, Paul Zelis, by whom this warrant was executed, do swear, under penalty of perjury, that
the above inventory contains a true and detailed account of all records/documentation
taken by me under the warrant.

All of the records taken by virtue of said warrant will be retained in my custody subject to
the order of this court or of any other court in which the offense in respect to which the
records, are triable.

Executed this 4th day of March, 2004.

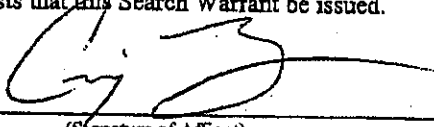
Paul Zelis

Paul Zelis, Detective
Criminal Investigations Division
Santa Barbara County Sheriff's Department

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 believe there is probable cause to believe, and I 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 locations set forth below. Wherefore, affiant requests that this Search Warrant be issued.



(Signature of Affiant)

NIGHT SEARCH REQUESTED: YES () NO (X)

(SEARCH WARRANT)

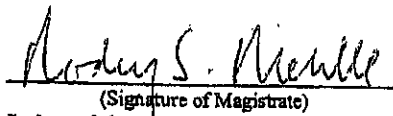
THE PEOPLE OF THE STATE OF CALIFORNIA TO ANY SHERIFF, POLICEMAN OR PEACE OFFICER IN THE COUNTY OF SANTA BARBARA: proof by affidavit having been made before me by Detective Craig Bonner, that there is probable cause to believe that the property described herein may be found at the locations set forth herein and that it is lawfully seizable pursuant to Penal Code Section 1524, in that it was used as the means of committing a felony, or is possessed by a person with the intent to use it as a means of committing a public offense or is possessed by another to whom he or she may have delivered it for the purpose of concealing it or preventing its discovery, or 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:

for the following described property and documentation: Refer to attachment "A"

AND TO SEIZE IT IF FOUND and keep it in your custody pending further order of this Court. This Search Warrant and incorporated Affidavit was sworn to as true and subscribed before me this 2nd day of March, 2004, at 10:10 a.m. p.m.

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



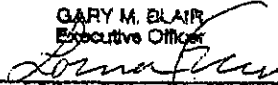
(Signature of Magistrate)

Judge of the Santa Barbara Superior Court, Santa Maria Division

NIGHT SEARCH APPROVED: YES () NO (X)

**FILED
SANTA BARBARA
SUPERIOR COURT**

MAR 02 2004

GARY M. BLAIR
Executive Officer
By: 
LORNA FREY Deputy Clerk

ATTACHMENT "A"

Items to be seized at Shurgard Storage, located at 22222 Ventura Boulevard, Woodland Hills, California:

1. Any and all documentation pertaining to the rental of storage locker/ unit

This shall include all

documentation created, or obtained (copies of identification, etc...) when the account was created, through the current date. is further ordered to provide all documentation created, or obtained (copies of identification, etc...), which pertain to other individuals who have accessed, or have access to storage locker is further directed to release all records pertaining to the dates and times when individuals have accessed storage locker

- 2.

a search will be conducted of storage unit for the presence of evidence related to our investigation, specifically: Notes, diaries, documents, photographs, audiotapes and videotapes tending to show a relationship between Michael Jackson,

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 allow investigators to conduct a comprehensive "forensic" examination of the computer hard drives and other storage media and reading/ interpreting the content of the media, including emails. Also, articles of personal property tending to establish the identity of persons in control of the premises to be searched, including the following: correspondence, receipts and other documents tending to show the identity of the person who owns the items stored within the storage unit.

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, 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 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 40 hour Child Abuse and Sex Crimes class. I have also attended a 32 hour Internet Crimes class and a 36 hour High Technology and Computer Crimes Investigation class.

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

Statement of Probable Cause:

Your Affiant and other Sheriff's detectives are currently investigating allegations of child molestation against Michael Jackson. Your Affiant is familiar with the allegations of fact provided by Detective Paul Zelis in his declaration in support of a warrant for the search of Neverland Ranch and two other locations that was executed on November 18, 2003. Your Affiant incorporates Detective Zelis's declaration in this declaration by this reference. Furthermore, your Affiant authored a search warrant and statement of

Based on your affiant's training and experience, I know persons who are involved in the commission of, or attempts to cover-up crimes will oftentimes secrete evidence of the crimes in private storage facilities. This is particularly true of individuals who believe law enforcement will attempt to find and seize the evidence through the service of search warrants at their residences. Furthermore, it is common for individuals who desire to secret evidence in storage lockers to have an acquaintance open to storage locker account under the acquaintance's name as a further means of preventing law enforcement from finding and seizing the evidence.

- items may include notes, documents, pictures, audio recordings and video recordings.
- Furthermore, notes and documents can be contained within computers, or other data storage devices, which may be stored within the storage unit in question. Your Affiant believes some of the documents may be contained in computer hard drives. Because of this, if your Affiant locates any such equipment within the storage unit, your Affiant seeks authority to seize the computer equipment described below and to allow investigators to conduct a comprehensive "forensic" examination of the computer hard drives and other storage media and reading/ interpreting the content of the media, including emails. Description of computer equipment:

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. Person 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."

Based on your affiant's training and experience, I do not believe [redacted] will release information pertaining to the rental of their storage units, unless they are directed to do so by a court order. Furthermore, it is your affiant's belief that a direct inquiry with regard to storage unit [redacted]

[redacted] would likely result in [redacted] being notified of law enforcement's interest in the unit. Your affiant further believes if [redacted] were to learn of our interest in the contents of the storage unit, [redacted] would remove the contents of the storage unit and move them to another location. For this reason, your Affiant seeks authority to search for and seize records [redacted]

Your affiant contacted [redacted] via telephone and spoke with a representative of the facility. Without providing any indication of my true identity and intentions, I made inquiries regarding their facility. I learned the facility has a number of security measures and practices in place, which could be used to establish the dates and times people access the storage unit in question. Your affiant further learned any additional individuals (beyond the person who opened the account) who are to have access to a unit would be asked to present identification (which would be photocopied) and their entry would be noted. The documentation created as result of these security measures could be used to further establish [redacted] was associated with the rental of and contents of the storage unit.

In summary, if a warrant is served at the [redacted] your Affiant believes SBSD investigators will recover evidence showing [redacted] is storing items in storage unit [redacted]. Furthermore, your affiant believes if the storage unit is still associated with [redacted] and a search of the locker is completed, SBSD investigators will locate and seize items of evidence related to our current investigation.

This is based on the following:

1. Throughout the investigation, SBSD investigators received information via the statements of various witnesses, to establish [redacted]

-2- Your Affiant and other SBSB investigators seized documents

The videos contained mostly edited content, which seemed to be chosen for its ability to shed positive light on Michael JACKSON. Your affiant believes would likely possess video storage media, which contains unedited footage.

3. Your affiant and other SBSB investigators spoke with separate witnesses, who heard:

enforcement was going to search his residence. felt law
witnesses with items belonging to provided one of the and asked the witness to place the items into a bank safe deposit box, which the witness was directed to open under the witnesses' name.

4. Your affiant and other SBSB investigators seized documents from likely has and/ or had access to
which I believe indicate We also seized documentation showing
storage locker/ unit number had an individual rent a storage unit
on at least one earlier occasion,

Your Affiant believes he has reasonable cause to believe that grounds for the issuance of a search warrant exist, as set forth in Section 1524 of the Penal Code, based upon the aforementioned, information, facts and circumstances.

Property/ documentation to be seized:

1. Any and all documentation pertaining to the rental of storage locker/ unit

This shall include all documentation created, or obtained (copies of identification, etc...) when the

account was created, through the current date. is further ordered to provide all documentation created, or obtained (copies of identification, etc...), which pertain to other individuals who have accessed, or have access

to storage locker is further directed to release all records pertaining to the dates and times when individuals have accessed storage locker

3. If the above documentation indicates storage unit is still rented/ leased by the individual/s who opened the account on

a search will be conducted of storage unit for the presence of evidence related to our investigation, specifically: Notes, diaries, documents, photographs, audiotapes and videotapes tending to show a relationship between Michael Jackson,

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 allow investigators to conduct a comprehensive "forensic" examination of the computer hard drives and other storage media and reading/ interpreting the content of the media, including emails. Also, articles of personal property tending to establish the identity of persons in control of the premises to be searched, including the following: correspondence, receipts and other

documents tending to show the identity of the person who owns the items stored within the storage unit.

The search of the actual storage unit will only be conducted if the records obtained from _____ indicate storage unit _____ is still rented/ leased by the individual/s who opened the account _____

Warrant Mechanics:

Your affiant commenced the actual physical mechanics of preparing this affidavit and attached search warrant at 3:00 P.M. on February 26, 2004; and your Affiant affixed his signature under oath to this affidavit before attaching a true copy of it to an e-mail communication with Magistrate Rodney S. Melville, at the time and date attested by Magistrate Melville on his copy of the Affidavit. The elapsed time reflected herein has been diligently utilized by your affiant in the mechanics of physically preparing these documents, locating and consulted with Senior Deputies District Attorney Gerald McC. Franklin of the County of Santa Barbara, in reference to the aforementioned preparation; locating Magistrate Melville; and conveying these documents to Magistrate Melville for his official action in connection therewith.

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 MARCH 26, I served a copy of the attached ORDER FOR RELEASE OF REDACTED DOCUMENTS addressed as follows:

THOMAS W. SNEDDON, DISTRICT ATTORNEY
DISTRICT ATTORNEY'S OFFICE
1105 SANTA BARBARA STREET
SANTA BARBARA, CA 93101

MARK GERAGOS, ESQ.
350 S. GRAND AVENUE, 39TH FLOOR
LOS ANGELES, CA 90071-3480

GIBSON, DUNN & CRUTCHER
c/o THEODORE J. BOUTROUS, ESQ.
333 SOUTH GRAND AVENUE
LOS ANGELES, CA 90071

FAX

By faxing true copies thereof to the receiving fax numbers of: 805-568-2398 (DISTRICT ATTORNEY); 213-625-1600 (MARK GERAGOS, ESQ.); 213-229-7520 (GIBSON, DUNN & CRUTCHER). Said transmission was reported complete and without error. Pursuant to California Rules of Court 2005(l), 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.

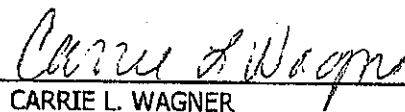
PERSONAL SERVICE

By leaving a true copy thereof at their office with their clerk therein or the person having charge thereof.

EXPRESS MAIL

By depositing such envelope in a post office, mailbox, subpost 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 26TH day of MARCH, 2004, at Santa Maria, California.


CARRIE L. WAGNER