

The Matter Of:

***Wade Robson
v.
MJJ Productions***

Wade Jeremy William Robson VOL I

December 12, 2016



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SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES

WADE ROBSON, an individual,) Case No. BC508502
Plaintiff,)
v.)
MJJ PRODUCTIONS, INC., a California)
corporation; MJJ VENTURES, INC., a)
California corporation; and DOES)
4-50, inclusive,)
Defendants.)
_____)

DEPOSITION OF WADE JEREMY WILLIAM ROBSON,
at 808 Wilshire Boulevard, Santa Monica, California,
commencing at 10:03 a.m., Monday, December 12, 2016,
before SUSAN E. LANSING, CSR No. 6355.

1 APPEARANCES OF COUNSEL:

2

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22

23 ALSO PRESENT:

24 Michael Currie, Videographer

25

1 A. No.

2 Q. Did you tell him that you were requesting a
3 certain amount of money for your book?

4 A. No.

5 Q. Did you have any discussions about money with
6 respect to your book?

7 MR. FINALDI: Objection; calls for
8 attorney/client communications. Instruct not to answer.

9 Q. BY MS. KLEINDIENST: Did you have any
10 conversations with anyone other than an attorney about
11 the amount of money you wanted for your book?

12 A. No.

13 Q. When I spoke to Mr. Nevins on the phone he
14 volunteered to me that you had demanded a large amount
15 of money for your book. Are you saying that he's lying?

16 MR. FINALDI: Assumes facts not in evidence,
17 assumes -- and also lacks foundation and it's
18 argumentative.

19 So, you can respond to the extent you know, but
20 do not disclose any attorney/client privileged
21 communications.

22 THE WITNESS: Tell me again what he said I
23 said.

24 Q. BY MS. KLEINDIENST: That you were demanding a
25 very large amount of money for your book.

1 A. Not true.

2 MR. FINALDI: And vague and ambiguous as to

3 "very large amount of money."

4 MS. KLEINDIENST: Going to ask the court

5 reporter to mark this as Exhibit 556.

6 (Deposition Exhibit No. 556

7 was marked for identification.)

8 (Witness peruses exhibit.)

9 THE WITNESS: Okay.

10 Q. BY MS. KLEINDIENST: You're not on this entire

11 e-mail exchange but it looks like the e-mail at the

12 bottom of the page is a February 23, 2013 e-mail that

13 you sent to Mr. Nevins; is that correct?

14 MR. FINALDI: Did you get this from Mr. Nevins?

15 MS. KLEINDIENST: Yes.

16 THE WITNESS: Yes, it looks that way.

17 Q. BY MS. KLEINDIENST: Do you remember whether he

18 responded to your e-mail?

19 MR. FINALDI: Calls for speculation.

20 THE WITNESS: I don't remember.

21 Q. BY MS. KLEINDIENST: Why were you asking him to

22 let you know all the publishers that he had been to?

23 A. I don't recall.

24 Q. At the top of the page there are three names

25 and each one appears to be -- well, strike that.

1 A. Yeah? Well, what I was going to speak to
2 specifically is that I don't remember my writings,
3 meaning what I was working on for the book, being sent
4 to any publishers. They may have been, but I didn't, I
5 don't recall that. I didn't think they were.

6 Q. Did you authorize them to be sent to
7 publishers?

8 A. I don't remember. From my, if my memory serves
9 me, I don't remember that, that that was something that
10 we weren't doing.

11 Q. When did you stop pursuing a book deal?

12 MR. FINALDI: Assumes facts not in evidence.

13 THE WITNESS: I believe it would have been
14 somewhere around, I mean, somewhere in the first quarter
15 of 2013.

16 Q. BY MS. KLEINDIENST: Why did you stop pursuing
17 a book deal?

18 A. I realized that it was very possibly not going
19 to be, meaning doing a book, not going to be as
20 impactful in that form as, as I wanted the message, as I
21 wanted the truth of Michael's sexual abuse of me to get
22 out there and be of help.

23 Q. Why?

24 A. Because I realized that possibly doing what we
25 are doing now, a lawsuit, would give me a platform to do

1 a lot more than a book could do, meaning, take
2 depositions, gather evidence to support the truth. And
3 eventually have a jury, you know, of 12 people or
4 whatever it is, proclaim that it is the truth.

5 Whereas, a book scenario, which, you know, once
6 released, is essentially out of my control, that it
7 could be, it could be exactly what I didn't want it to
8 be in the beginning, meaning, it being a tabloid,
9 sensationalism sort of thing that, you know, has some
10 attention on it for a minute and then fades away.

11 Q. What do you mean by "out of my control"?

12 A. I don't know, just what I mean. Once you --
13 meaning how it's -- yeah, once you release it, what else
14 can you -- there it is, what else can you do about it,
15 meaning, how people are going to receive it and it just
16 becoming that sensationalism, you know, media tabloid
17 sort of thing. Not being powerful enough, meaning, just
18 as I said, you know, being able to go through the
19 process of gathering evidence and prove that my truth is
20 the truth.

21 Q. Do you feel like litigating a lawsuit is more
22 in your control?

23 A. More in my control. No, I don't think I would,
24 I don't think I would flip meaning of control in
25 relation to a lawsuit. It would just be the other

1 correct?

2 A. I don't see a year. I see February 15th.

3 Q. Do you remember this e-mail exchange?

4 A. No, don't remember.

5 Q. Do you remember asking your mom about a witness
6 statement from Charli Michaels?

7 A. No.

8 Q. Do you remember your mom -- do you remember
9 talking to your mom at all about a witness statement
10 from Charli Michaels?

11 A. No.

12 Q. Do you remember your mom ever refuting what was
13 said by Charli Michaels in that witness statement?

14 A. No.

15 MS. KLEINDIENST: I'll ask the court reporter
16 to --

17 THE WITNESS: Can we take a quick bathroom
18 break?

19 MS. KLEINDIENST: Sure. I think we have to
20 change the tape anyway. Let's go off the record.

21 THE VIDEOGRAPHER: This marks the end of DVD
22 number one. The time is 12:03 p.m. and we're off the
23 record.

24 (A recess was taken.)

25 THE VIDEOGRAPHER: This marks the beginning of

1 Do you recall obtaining any documents from
2 mjfacts.com for purposes of this lawsuit?

3 A. I don't remember.

4 MS. KLEINDIENST: Go ahead and mark this as
5 Exhibit 573.

6 (Deposition Exhibit No. 573
7 was marked for identification.)

8 Q. BY MS. KLEINDIENST: Again, this is a big
9 document so I don't want you to read the whole thing
10 right now, but just look, read enough so that you can
11 identify the document if you can.

12 A. Okay.

13 (Witness peruses exhibit.)

14 Okay.

15 Q. What is Exhibit 573?

16 A. This is what started as my writing to just kind
17 of reprocess my life and the truth of my story with
18 Michael, and then began to turn into this being a goal,
19 to turn it into a book.

20 Q. I notice across the top it says "FOR MY
21 ATTORNEYS."

22 A. Uh-huh.

23 Q. When did you add that?

24 MR. FINALDI: Calls for speculation.

25 THE WITNESS: I don't remember.

1 Q. BY MS. KLEINDIENST: And if you look at the
2 last page, I'm not sure if you can but from this page
3 can you tell whether this is the entire draft of your
4 book?

5 A. Yeah, I mean, not, not based on reading the
6 page, because I don't, I mean, I haven't, I haven't
7 reread any of this stuff since I wrote it, but based on
8 I know I produced all that there was of the book, you
9 know.

10 Q. And I think that you maybe testified before
11 that you stopped working on the book in March of 2013;
12 is that right? Or April?

13 A. I thought maybe around then, yeah.

14 Q. And have you worked on it at all since then?

15 A. No, I don't believe so.

16 Q. Are you still thinking about publishing a book?

17 A. It's still a possibility. It's not ruled out.

18 Q. Is it something that you're actively pursuing
19 right now?

20 A. No.

21 Q. I want to go through some of your history with
22 Michael Jackson.

23 A. Okay.

24 Q. I understand that you first met him in November
25 of 1987; is that right?

1 A. No.

2 Q. Do you remember if you had asked to go to the
3 airport to meet Michael or if it was your mom's idea?

4 A. I don't know.

5 Q. When you went to the meet-and-greet after one
6 of Michael's concerts, how many people from your family
7 were also there?

8 A. I only remember my mother and my father. It's
9 possible that my sister was there too, but I only
10 remember mother and father.

11 Q. And do you remember there being a lot of other
12 people other than your family also at that
13 meet-and-greet?

14 A. Yes.

15 Q. I understand that at that meet-and-greet you
16 only had the opportunity to speak to Michael for a few
17 minutes; is that about right?

18 A. Yes.

19 Q. And while you were at that meet-and-greet you
20 showed Michael some of your dance moves?

21 A. I'm not sure if I actually showed him dance
22 moves. I remember him commenting -- I was, you know,
23 dressed like him, right, in a, like, a homemade Bad
24 outfit, and I remember him commenting on my outfit and I
25 believe he asked me, like, I don't even know if he knew

1 why I was there, meaning, in relation to the dance
2 contest, because I remember him asking me if I danced,
3 you know. I think I said yes and then, and then he
4 asked if I wanted to dance with him in the, in the show,
5 which was in, I don't know, couple nights from then,
6 upcoming show.

7 Q. Do you remember your mom volunteering to
8 Michael that you would be at that concert the next
9 night?

10 A. I don't.

11 Q. So, you did dance on stage with Michael at a
12 concert in Australia; correct?

13 A. Yes.

14 Q. And that, again, was within a few days of the
15 meet-and-greet?

16 A. I believe so.

17 Q. When you -- that night that you danced on
18 stage, did you have any time with Michael off stage?

19 A. Not that night I don't believe.

20 Q. So, you didn't have any conversations with
21 Michael that night?

22 A. I believe our only interaction that night was
23 on stage.

24 Q. And then, I understand that you had another
25 interaction with Michael Jackson soon thereafter when

1 Q. While you were at that Record One meeting,
2 Michael asked your family if they wanted to come to
3 Neverland; correct?

4 A. Correct.

5 Q. So, he personally invited your family?

6 A. Yes.

7 Q. And your whole family agreed to go?

8 A. Yes.

9 Q. And you and your sister and your parents and
10 your mother's parents all went and stayed at Neverland
11 that weekend; correct?

12 A. Yes. I -- Michael asked if myself and my
13 sister wanted to drive with him in his car and, and we
14 did. And so we drove with him to Neverland while my
15 parents and grandparents followed behind.

16 Q. So it was just you and your sister and Michael?

17 A. Yeah, in the car.

18 Q. Do you remember that specifically or is that
19 something that you've been told since that time?

20 A. No, I remember that.

21 Q. The first night that you were at Neverland, you
22 and your sister asked to stay in Michael's bedroom;
23 correct?

24 A. I don't remember how that went down, how that
25 came up. I find it hard to believe that I did because I

1 was a really sort of shy, reserved kid. So, but I don't
2 remember how that went down. I don't remember, you
3 know, who asked who.

4 Q. Okay. If you could turn to page 22 of Exhibit
5 573.

6 A. Okay.

7 Q. On the top of page 22 you wrote, "It came time
8 to go to bed and my sister and I asked if we could
9 'Please, Please' stay with Michael. Michael said it was
10 okay with him if it was okay with my parents."

11 A. I see that.

12 Q. Do you remember writing that?

13 A. I don't.

14 Q. Do you remember, or, do you know whether that
15 came from your own recollection or it was told to you by
16 someone else?

17 A. I don't know. You know, what these writings,
18 like as I talked about, the original intention of how
19 they started, which was just for the sake of my
20 processing, right, and then it became for the purpose of
21 a book. You know, this reprocessing of my entire life
22 for me through this healing process, you know, has been
23 and will continue to be, I imagine so, for the rest of
24 my life, meaning, you know, my perspective on things, my
25 understanding of things, is constantly evolving as I

1 remove the clutter from it all, remove the, the
2 emotional and perspective repression of it all that I
3 had compartmentalized for 22 years. So, all that to say
4 that, you know, this process evolves as far as what I,
5 what I remember, what comes clear and my perspective on
6 things.

7 Q. So, have your memories changed as you've gone
8 through that process?

9 A. They've evolved.

10 Q. What do you mean by "evolved"?

11 A. Yeah, I mean, not changed in a sort of
12 black-to-white sense. Like, I thought it was this
13 thing -- well, I mean, they have as far as prior to the
14 healing process, right. Prior to disclosing. But post
15 disclosing the abuse in 2012 and beginning that healing
16 journey, they've evolved as far as I remember more
17 details about scenarios. As it goes along, you know, it
18 evolves, details get added to.

19 Q. It's my understanding that you are not claiming
20 that you ever repressed any memory of the abuse; is that
21 correct?

22 A. Yeah, I never forgot what happened between
23 Michael and I.

24 Q. Okay.

25 MR. FINALDI: Calls for legal conclusion.

1 Belated objection.

2 Q. BY MS. KLEINDIENST: So, you never forgot the
3 facts or events as they occurred, you just gained a
4 different perspective on them?

5 A. Yeah. I never forgot the facts of what
6 occurred. I had completely -- I never thought about it
7 until May of 2012. I just constantly, it was just this
8 thing that I completely compartmentalized and put away,
9 you know. As far as any sort of perspective on it, any
10 sort of intellectual or emotional perspective on it, you
11 know, I thought I was just absolutely fine with it and
12 it was something I never needed to speak about or deal
13 with until, you know, I had no choice but to deal with.

14 Q. But you're not claiming that you forgot any of
15 the details; --

16 A. No.

17 Q. -- is that right?

18 A. I'm not claiming that.

19 Q. Okay. You testified, I think, that you, as you
20 go through this process and your memories evolve, you
21 remember more. What do you mean by that?

22 A. I don't know how clearer I can make that. I
23 remember more details of, of what went on.

24 Q. So, are you saying that there are things that
25 you had forgotten and that if someone had asked you, you

1 know, in 2010 or 2011, you would say that you didn't
2 remember, but now, if they ask you now, you do remember?

3 MR. FINALDI: Misstates testimony.

4 MS. KLEINDIENST: I'm just asking you if that's
5 what you're saying.

6 MR. FINALDI: And assumes facts not in
7 evidence.

8 THE WITNESS: That's a tough question to ask
9 because if you're, if you're referring to the abuse in
10 any way, shape or form, if anyone asked me, and many
11 people did, prior to May of 2012, you know, if any abuse
12 ever happened between Michael and I, no matter what I
13 remembered or didn't, I never would have, never could
14 have, disclosed anything about it. So, you know what I
15 mean? In that case I don't know how to answer your
16 question.

17 Q. BY MS. KLEINDIENST: But if they had asked
18 you -- well, strike that.

19 You are not saying that before 2012 you didn't
20 remember what happened; correct?

21 MR. FINALDI: Asked and answered.

22 THE WITNESS: I'm not saying that before 2012 I
23 didn't remember what happened, but I am saying that I
24 didn't understand it whatsoever. I didn't understand it
25 as abuse.

1 Q. Sure. So, you're looking on page 24 now?

2 A. Yeah.

3 Yes, this is the scenario that I was just --
4 this is about the scenario that I was just speaking of.

5 Q. And it says after that, "I don't believe
6 anything out of the 'ordinary' happened that night."

7 Is that consistent with your recollection?

8 A. Yeah, I don't really remember.

9 Q. On page 25, you just, you say, "My Mother,
10 Father, Sister, Grandmother and Grandfather were now
11 gone and it was just Michael, I and Neverland: 2,700
12 acres of impenetrable Michael Jackson country governed
13 by one man only, Michael Jackson." You see that?

14 A. I see that.

15 Q. Did you write that?

16 A. I believe so. That line speaks to my then
17 understanding when I wrote it, you know, so that's one
18 of the examples of my growing understanding of how this
19 all went down.

20 Q. Can you turn to page 26. The first paragraph
21 that's not in italics, you write, "Michael had already
22 become quite affectionate with me over the first two
23 days of our Neverland trip. I would curl up in his arms
24 to go to sleep. He would kiss me on my head and tell me
25 he loved me and I would tell him I loved him back; all

1 seemingly innocent at the time."

2 Am I correct in assuming that in that paragraph
3 you're describing your first trip to Neverland over that
4 weekend with your family?

5 A. Yes.

6 Q. You continue:

7 "Now that Michael and I were all alone, the
8 rest of my family far away in an RV at the Grand Canyon,
9 the nights became a very different experience. No
10 longer your 'average' kids sleepover."

11 "I believe the first night after my family had
12 left, Michael began to fondle my penis over the top of
13 my pajama pants."

14 Do you see that?

15 A. I see that.

16 Q. Did you write that?

17 A. I believe so.

18 MR. FINALDI: It's 1:15.

19 MS. KLEINDIENST: Okay, let's go off the
20 record.

21 THE VIDEOGRAPHER: The time is 1:15 p.m. and we
22 are off the record.

23 (The lunch recess was taken at 1:15 P.M.,
24 and the deposition reconvened at 2:24 PM.,
25 with all parties present as before.)

1 Q. You refer to yourself as "a master of
2 deception"; correct?

3 A. Here, yes, in the writing.

4 Q. Do you believe that you're a good liar?

5 A. I believe Michael Jackson taught me how to lie
6 really well about the abuse that I suffered at his
7 hands.

8 Q. And you did consistently, you're claiming now,
9 lie about the abuse from when it started when you were 7
10 years old until May 8th, 2012; correct?

11 A. Say that one more time.

12 Q. Sure. You consistently lied, it's your claim
13 now that you consistently lied about the abuse from the
14 time you were 7 until May 8th, 2012; correct?

15 A. Yeah. I told the story that Michael taught me
16 to tell until May 8th, 2012.

17 Q. And when people pressed you on that story or
18 asked you questions, you consistently said that Michael
19 had not abused you; correct?

20 A. Correct.

21 Q. And you denied specific aspects. For example,
22 do you remember your mother asking if you had ever
23 showered with Michael Jackson?

24 A. I don't remember.

25 Q. Do you remember people ever asking you specific

1 November 14th, 2012?

2 A. If it's -- I believe so, if it's the one I'm
3 thinking of. If it's the get-together I'm thinking of.

4 Q. Do you remember a get-together at a place
5 called Fire -- hold on. Firefly?

6 A. Yeah.

7 Q. Where is Firefly?

8 A. I believe it's in, like, Studio City, North
9 Hollywood, on Ventura.

10 Q. Is it a restaurant? Bar?

11 A. Yeah, restaurant/bar.

12 Q. What was the purpose of getting together with
13 your mom that night?

14 A. So, since I disclosed in May of 2012, as I
15 explained a little earlier, my relationship was already
16 complicated with her but it started going to a whole new
17 level of complication with beginning to deal with the
18 abuse for the first time and all this emotions that were
19 coming up towards her, anger, resentment. So, as well
20 as, you know, once my wife learned of the abuse post me
21 disclosing to my therapist in May, that, you know, she
22 became just livid at my mother that, you know, that she
23 didn't see something and didn't do something about it
24 and enabled this to happen.

25 So, my wife was not willing to see her at all

1 for at that point, you know, an indefinite amount of
2 time. We didn't know when that was going to end. I
3 believe it is still, you know, my wife was still not
4 seeing her at this point. So, the complication of our
5 emotional, my mother and I's emotional relationship at
6 that point, and just being estranged, I mean, I just
7 wasn't seeing her much.

8 And so, the point was for me to get together
9 with her and, you know, be really honest with her about,
10 one, all of the feelings that I was going through in
11 relation to processing the abuse to my feelings
12 specifically towards her, my anger, my resentment, my
13 questions, my confusion. Yeah, that was -- I was trying
14 to sort of, you know, really take a step for a
15 relationship, hopefully, but, yeah, just to be honest
16 with her about what I was going through.

17 Q. Did you blame your mother for the abuse?

18 A. Not solely but I wasn't through phases of, you
19 know, her, putting some of the blame on her for not
20 being more aware and enabling it to happen.

21 Q. Do you still blame her for the abuse?

22 A. You know, I understand now that just as much as
23 Michael groomed me from day one with his entire persona,
24 with his lifestyle, and with gifts and promises of all
25 we were going to do together and how we were going to

1 change the world together and all of that shit, just as,
2 yeah, gifts, all of that stuff, just as much as he
3 groomed me, he groomed my mother as well, and he groomed
4 my sister as well.

5 And what I mean by that is, he went out of his
6 way to create a separate relationship with my mother as
7 well, to -- you know, at times, I mean, it was kind of
8 back and forth. Sometimes he really treated her like
9 shit as well as far as hiding me from her and things
10 like that, but making her feel special, you know, making
11 her part of this lifestyle, sending her gifts, all of
12 that sort of stuff.

13 So, all that to say, understanding that she was
14 brainwashed and manipulated a different way, in some
15 different ways but just as much as I was, so I have more
16 of an understanding about that now as to how much she
17 missed or how much her awareness wasn't at a level that
18 I wish it was as a parent.

19 Q. You claim that the abuse happened within a
20 couple days of you getting to Neverland; correct?

21 A. Within a couple days.

22 MR. FINALDI: Vague and ambiguous as to
23 "abuse."

24 MS. KLEINDIENST: The first time.

25 MR. FINALDI: Still vague and ambiguous.

1 conversations with Thomas Mesereau?

2 A. I remember having one very short conversation.

3 Q. Approximately how long?

4 A. Like, five to ten minutes.

5 Q. How long before your testimony was that
6 conversation?

7 A. Within a day or two before my testimony.

8 Q. And it's, well, do you recall being subpoenaed
9 for the criminal testimony in 2005?

10 A. I do.

11 Q. Do you recall where you were when you were
12 subpoenaed?

13 A. I don't.

14 Q. Do you recall if you were with anyone when you
15 were subpoenaed?

16 A. I don't remember how I got the subpoena.

17 Q. Sorry, we have to go off the record to change
18 the tape.

19 A. Okay.

20 THE VIDEOGRAPHER: This marks the end of DVD
21 number two in today's deposition. Time is 3:18 p.m. and
22 we are off the record.

23 (A recess was taken.)

24 THE VIDEOGRAPHER: This marks the beginning of
25 DVD number three. The time is 3:25 p.m. and we're back

1 on the record.

2 Q. BY MS. KLEINDIENST: Okay, we were talking
3 right before we went off the record about your testimony
4 at the criminal trial. Other than Tom Mesereau, did you
5 speak to anyone else prior to testifying at the criminal
6 trial?

7 MR. FINALDI: Vague and ambiguous as to
8 "criminal trial."

9 MS. KLEINDIENST: About your testimony.

10 MR. FINALDI: '05 you're talking about?

11 MS. KLEINDIENST: Yes.

12 THE WITNESS: I remember speaking to Scott
13 Ross, who was I believe an investigator of some sort.

14 Q. BY MS. KLEINDIENST: How many times did you
15 speak to Scott Ross?

16 A. Once, maybe twice.

17 Q. For how long?

18 A. I don't remember, but, you know, wouldn't have
19 been longer than 30 minutes, maybe.

20 Q. Per time or all together?

21 A. Yeah, I feel like maybe there was one
22 conversation that may have been in the 30-minute range,
23 and then, maybe one other shorter one.

24 Q. What did you talk about?

25 A. I don't remember any specifics. I mean,

1 obviously the subject matter was, was about the case,
2 but I don't remember.

3 Q. Anyone else that you spoke to about your
4 testimony before you testified at the 2005 criminal
5 trial?

6 A. Anyone else that I spoke to about my testimony?

7 Q. Right. Or the fact that you were going to
8 testify.

9 A. The fact that I was going to testify. I mean,
10 yeah, my wife would have known about it, we would have
11 talked about it. I imagine I talked to my mother about
12 it. My sister.

13 Q. Do you remember those conversations?

14 A. I don't, not specifically.

15 Q. Did you want to testify in the criminal trial?

16 A. I didn't want to, no.

17 Q. Did you tell anyone that you didn't want to
18 testify?

19 A. I told Michael that I didn't want to testify.

20 Q. And what did he say?

21 A. I just remember him listening to me. I
22 remember I was saying reasons along the lines of, you
23 know, when I went through all of this before in '93 it
24 was so intense with the media and everything and I'm
25 trying to start a new life, I'm about to get married,

1 and I just don't want to go through all this shit again.

2 I remember this juxtaposition with him where on
3 one side, you know, he would listen and he would act as
4 if he was compassionate to my reasons and yeah, yeah,
5 you know, I understand, like, I understand it's intense
6 and you don't want to go through that, but then he would
7 flip into the same role-playing stuff that he did with
8 me when I was 11, so, and the Jordan Chandler case was
9 going on.

10 Q. Like a question/answer?

11 A. Yeah. He would just kind of slip into this
12 whole role thing, and that would always be preceded, or,
13 at some point he would remind me or say, both times,
14 when I was 11 and this time when I was 22, that, you
15 know, that they're listening, whoever "they" is, you
16 know, the bad guys, the other side, your phones are
17 tapped, they're listening to us. He'd always remind me
18 of that and then would dip into -- essentially, I mean,
19 my perspective on it now is like a rehearsal for the
20 stand, you know, where he would say they're saying we
21 did all these disgusting things together.

22 Q. So this was part of your conversation -- I
23 really want to focus on the conversation when you were
24 22.

25 A. Yeah, I am.

1 Q. And this was part of your conversation. Where
2 were you having this conversation?

3 A. I believe, I mean, on the phone, but I believe
4 I was in, you know, my house in Tarzana. These were
5 many conversations, but.

6 Q. How many conversations?

7 A. It depends, yeah, if we get specific. Like, as
8 far as me telling him that I didn't want to testify?

9 Q. Yes, yes.

10 A. I think that was one time that I told him that,
11 you know.

12 Q. Was that before or after you were subpoenaed?

13 A. Before.

14 Q. And after you were subpoenaed did you tell him
15 again that you didn't want to testify?

16 A. No.

17 Q. Did you talk to him at all about the fact that
18 you were going to testify?

19 A. Absolutely.

20 Q. But you didn't tell him, "Hey, Michael, I
21 really don't want to do this"?

22 A. No. I figured once I was subpoenaed I had no
23 choice anymore.

24 Q. Did you talk to Thomas Mesereau about the fact
25 that you didn't want to testify?

1 Q. And your response is "No." Do you see that?

2 A. Yes.

3 Q. And you now claim that was a lie; correct?

4 A. That was not the truth.

5 Q. Can you turn to page 91, 9112. On line 20 you
6 were asked, "Was there ever an occasion where you were
7 on the dance floor with Mr. Jackson and he was showing
8 you a routine and he grabbed your crotch in a manner
9 similar to how he would grab his own crotch while doing
10 those performances?" Do you see that?

11 A. Yeah.

12 Q. And you testified, "No, that's not true." Do
13 you see that?

14 A. Yes.

15 Q. Is that true that he, that never happened?

16 A. That's not true that that never happened.

17 Q. So, your response at line 25, "No, that's not
18 true," was a lie?

19 A. That's not the truth, yeah.

20 Q. Can you turn to page 9116. At line 19 you're
21 asked, "What you're really telling us is nothing
22 happened while you were awake; isn't that true?" and you
23 testified, "I'm telling you that nothing ever happened."
24 You now claim that was a lie; correct?

25 A. That was not the truth. Anything in here that

1 shown certain materials when you testified in the
2 criminal trial; correct?

3 A. Yes.

4 Q. Had you -- when you looked at those materials,
5 were there any of those materials where you thought,
6 "Oh, I've seen this before"?

7 A. Yeah. All of it.

8 Q. So, you had seen --

9 A. I mean, I don't know about, like, exactly that
10 magazine or exactly that book.

11 Q. Uh-huh.

12 A. But that type of thing, that type of material I
13 had seen before. Michael showed it to me when I was a
14 young boy.

15 Q. Can you turn to page 9168. On line 5 you were
16 asked, "And you had never, ever known that Mr. Jackson
17 collected sexually explicit material?" and your response
18 was "No." You now claim that was a lie; correct?

19 A. That's not the truth.

20 Q. You were asked, "This is something new that
21 you're learning just today; is that right?" and you said
22 "Yes." You now claim that was a lie; correct?

23 A. That's not the truth.

24 Q. Since you testified at the criminal trial in
25 2005, have you ever attempted to reach out to Gavin

1 Arvizo or his family?

2 A. No. Not that I recall, no.

3 Q. When you testified at the criminal trial in
4 2005, did you feel a sense of shame of what had happened
5 between you and Michael?

6 A. No. I didn't, I didn't have any, as I stated,
7 I didn't have any perspective on it. I didn't forget
8 about it, but I didn't think about it. I, I just didn't
9 let myself think about it. So, I know, and I may have
10 said this before somewhere else, and it may have been
11 misconstrued, I know now and I know post disclosing in
12 2012 and beginning that process of reprocessing and
13 understanding, I know now that I had, that I was dealing
14 with shame then, but I did not know that at the time. I
15 did not understand that at the time.

16 Q. Were you ever worried about disclosing the fact
17 that you had been abused because you thought that
18 everyone was going to think that you were wrong or
19 disgusting or gay?

20 MR. FINALDI: Assumes facts not in evidence.

21 THE WITNESS: I didn't know that at the time.
22 I didn't know that at any, at any time until post May
23 2012. I began then, May 2012, to understand that so
24 many of my symptoms of fear and anxiety in social
25 scenarios, in almost any scenario, related to this sort

1 of unconscious, subconscious, shame and guilt. But I
2 never understood that before May 2012 that that's what I
3 was feeling.

4 Q. BY MS. KLEINDIENST: You didn't have conscious
5 feelings of shame or guilt?

6 MR. FINALDI: Asked and answered,
7 argumentative. He's already answered that.

8 MS. KLEINDIENST: I'm just clarifying.

9 MR. FINALDI: You're not clarifying, it's the
10 same question.

11 THE WITNESS: I had feelings of shame and guilt
12 but I never related them, I never understood that they
13 had anything, any connection to, had anything to do with
14 the abuse. I thought that they were just always
15 connected to work life or just general social anxieties
16 or stuff within my family, but I never understood until
17 post 2012 why I had that, those feelings of shame and
18 guilt, which was relating to the abuse.

19 Q. BY MS. KLEINDIENST: Do you have any knowledge
20 of other people who claim they were abused by Michael
21 Jackson?

22 A. That's a pretty broad question. Like, do I
23 have knowledge of other people who have, is that the
24 question, who have claimed that they were sexually
25 abused by Michael Jackson?

1 the exact dates, when I was real young, somewhere in the
2 age range of, like, 9 to 11 or -- nothing, nothing
3 substantial as far as communication. And then, post
4 that, the only other time I saw him was when he was
5 deposed for this case. I was at the deposition.

6 Q. When was the last time you spoke to James
7 Safechuck?

8 A. I believe the last time we spoke would have
9 been sometime in early 2014.

10 Q. What did you talk about?

11 MR. FINALDI: Hang on. Object to the extent it
12 calls for attorney/client communications.

13 So if this was a conversation with attorneys
14 there, I'm going to instruct you not to answer.

15 Q. BY MS. KLEINDIENST: Did you have a
16 conversation without an attorney present with Mr.
17 Safechuck in 2014?

18 A. No.

19 Q. Prior to 2014, when was the next last time you
20 spoke to James Safechuck?

21 A. I believe I would have been 14 or 15 years old
22 and there was a, a weekend at the ranch that was
23 organized by Evvy Tavasci, and it was Michael, myself,
24 James Safechuck, there was another young man who was, I
25 don't remember his name but he was a burn victim that

1 Michael, you know, befriended at some point, and Robert
2 Weiss who was a film director.

3 And the purpose of the trip, of the weekend
4 trip, was to spend time -- both James and I and I guess
5 this other guy were interested in filmmaking, as was
6 Michael, and so spent the weekend having talks with
7 Robert Weiss.

8 Q. You said you were 14 or 15 at that time. Do
9 you remember if this was after the incident at either
10 the Hilton or the Sheraton when you were 14?

11 A. I'm not sure.

12 When you get a chance, too, I remember some
13 other locations that abuse went down.

14 Q. Sure. We can do that now.

15 A. We went on a trip to, my mother, myself and
16 Michael, went on a trip on Las Vegas.

17 Q. Is that the Mirage Hotel?

18 A. Yeah. Which was either in, I think it was in
19 1990. 1990 or '91. And I think we stayed for about a
20 week, and, at the Mirage Hotel, and Michael had, you
21 know, massive suite. I believe there was multiple
22 bedrooms. I stayed in the bedroom with Michael, in
23 Michael's bedroom, and my mother stayed in a different
24 bedroom, and abuses went on every night that we were
25 there.

1 Q. And your mother was there the whole trip?

2 A. There in Vegas, yeah.

3 Q. And there in the general suite?

4 A. Yeah.

5 Q. Any other locations?

6 A. In, in a shower at Neverland, we often took
7 showers together, and there would be fondling and
8 kissing that he would do that would go on in there.

9 And then, also at Record One, I believe it was
10 Record One, I know it was a recording studio, I think it
11 was Record One, but, yeah, you know, he had, like, a
12 little green room, like, his own room that he would, you
13 know, he had for him when he was not in the studio booth
14 recording. So, I remember going there a couple times
15 and, and so he was working and I would stay in his sort
16 of green room while he was in the, you know, recording
17 booth or whatever, and then he would come back into the
18 green room and abuse would go on there.

19 Q. Was that on one occasion or multiple occasions?

20 A. I'd say in the range of, like, one to three
21 occasions.

22 Q. And can you recall if anyone else was present
23 at Record One?

24 A. Oh, yeah. I mean, I don't know who they were,
25 but there was, it was, you know, a, a stocked recording

1 studio with studio engineers and assistants and that
2 sort of thing.

3 Q. Do you remember if anyone from your family was
4 there?

5 A. I don't believe so.

6 Q. Do you remember the first time you went to
7 Record One and abuse occurred?

8 A. You know, I believe it would have been within
9 those two trips that we took, in between the first trip,
10 you know, there was the January, I believe, 1990 trip
11 when we first met again and the abuse first started on
12 that trip, and then there was two trips, I believe,
13 after that, before we moved to America, to L.A. So, I
14 believe it was within those two trips, in the middle.

15 Q. And your mom was on both of those trips; right?

16 A. Yes.

17 Q. Do you remember if Chantal went on either of
18 those trips?

19 A. I don't believe so.

20 Q. Can you --

21 A. There's more locations.

22 Q. Okay, go back to -- what other locations?

23 A. There were multiple times when we were onset
24 together of work projects he was doing. One I believe
25 was the Pepsi commercial where I played him as a child.

1 And there was abuse that went on in his trailer. And
2 that was, I remember, Wayne Nagin, I guess how you say
3 his last name, Nagin or Nagin, the bodyguard, longtime
4 bodyguard.

5 Q. Do you know how it's spelled?

6 A. I think it's N-a-g-i-n.

7 Q. The first name was Wayne?

8 A. Wayne, yeah. I know he was around as the
9 bodyguard then.

10 Q. When you -- hold on. Sorry, I got a little
11 distracted. Where were you, that was onset?

12 A. Yeah, the set of the Pepsi commercial where I
13 played him as a kid.

14 Q. Okay. And was anyone else in your immediate
15 vicinity? I mean, do you think that there was someone
16 that was at the Pepsi commercial that witnessed abuse?

17 A. It's possible. I mean, I know he was, his
18 trailer was surrounded by his people, by bodyguards, I
19 believe his manager that I think was possibly Sandy
20 Gallin, was around at the time.

21 Q. When you say "it's possible," are you actually
22 aware of anyone who did witness the abuse?

23 A. No, I'm not.

24 Q. Were there any, other than the Pepsi
25 commercial, were there any other set locations where

1 abuse occurred?

2 A. That's the one I remember.

3 Q. Any other locations? I mean, if you remember
4 more later you can let me know.

5 A. Yeah, okay.

6 Q. Do you remember the last time you saw Michael
7 Jackson before he died?

8 A. I believe the last time was in Las Vegas, and
9 my wife and I went to visit him and the kids at the
10 house that he was living in Las Vegas, which would have
11 been, I believe, some point in 2008.

12 Q. And what happened? What were you going to see
13 him for?

14 A. So, I was in Vegas working, I was
15 choreographing a Cirque Du Soleil show, and he was
16 living there at the time. We were talking on text a
17 lot, which was a very new -- he never really had phones
18 or any -- like, wasn't able to communicate in that way,
19 that was a new thing, a new way for us to communicate.
20 So, we were just talking about catching up, seeing each
21 other.

22 And one of them -- there was a couple really
23 weird circumstances and details about that meeting. I
24 remember I had this idea that I really wanted it to be
25 super regular, meaning, I wanted it to be, like, you

1 579. The statement that you wrote was, "Michael Jackson
2 changed the world and more personally, my life forever.
3 He is the reason I dance, the reason I make music, and
4 one of the main reasons I believe in the pure goodness
5 of human kind. He has been a close friend of mine for
6 20 years. His music, his movement, his personal words
7 of inspiration and encouragement and his unconditional
8 love will live inside of me forever. I will miss him
9 immeasurably, but I know that he is now at peace and
10 enchanting the heavens with a melody and a moonwalk. I
11 love you Michael." Is that right?

12 A. That's what I wrote, yeah.

13 MS. KLEINDIENST: I'll ask the court reporter
14 to mark this as Exhibit 580.

15 (Deposition Exhibit No. 580
16 was marked for identification.)

17 (Witness peruses exhibit.)

18 THE WITNESS: Okay.

19 Q. BY MS. KLEINDIENST: This is an e-mail that you
20 wrote to Jeff Thacker on June 26, 2009; correct?

21 A. Yeah.

22 Q. And you mention "show." Is the show that
23 you're referring to in the last, second-to-last
24 sentence, or, second-to-last line, you said, "I wanted
25 to write you now so if you guys are thinking of doing

1 any dance tribute to MJ on the show, I would like it to
2 be me who does it." Do you see that?

3 A. Yeah.

4 Q. Is the show So You Think You Can Dance?

5 A. Yeah, I believe so.

6 Q. Is Jeff Thacker associated with So You Think
7 You Can Dance?

8 A. Yeah, he's a producer.

9 It speaks to my compartmentalization at the
10 time.

11 MS. KLEINDIENST: I'm going to ask the court
12 reporter to mark this as Exhibit 581.

13 (Deposition Exhibit No. 581
14 was marked for identification.)

15 Q. BY MS. KLEINDIENST: By the way, before we get
16 to that, did you have some sort of involvement with So
17 You Think You Can Dance in June of 2009?

18 A. In June of 2009. Yeah, I believe I was doing
19 some choreographing some numbers for them then.

20 Q. On an ongoing sort of basis or --

21 A. Yeah. I mean, yeah, I, my involvement with
22 them goes back to, I believe, 2006 choreographing for
23 them, but, yeah, at that time I was doing some for that
24 season, you know.

25 Q. Okay. So, turning to Exhibit 581. This is an

1 A. Charles Klapow. So, I don't know if he was,
2 you know, the first way that I learned about it, I'm not
3 sure, but I know I learned some details about it from
4 him.

5 Q. Were you upset that -- well, strike that,
6 Were you invited to the private memorial?

7 A. I don't believe so.

8 Q. Were you upset that you were not invited to the
9 private memorial?

10 A. Yeah, I was hurt.

11 Q. Why?

12 A. Because at that point, you know, I still
13 thought that we were, that Michael and I were, you know,
14 were close friends for a very long time, had a long
15 relationship, that, you know, that I would have been
16 included in something like that.

17 MS. KLEINDIENST: I'm going to ask the court
18 reporter to mark this as Exhibit 585.

19 (Deposition Exhibit No. 585
20 was marked for identification.)

21 MS. KLEINDIENST: This is an e-mail from you to
22 Kenny Ortega on July 21st, 2009; correct?

23 A. July 21st, 2009, yep.

24 Q. And you say to Kenny Ortega, "I know that you
25 are working on how to bring Michael's last vision to

1 Q. Do you remember any of the particular revisions
2 you made?

3 A. No.

4 Q. And Matt Alan I assume is someone who was also
5 involved in that book?

6 A. Yeah.

7 MS. KLEINDIENST: I'll ask the court reporter
8 to mark this as Exhibit 590.

9 (Deposition Exhibit No. 590
10 was marked for identification.)

11 (Witness peruses exhibit.)

12 THE WITNESS: Okay.

13 Q. BY MS. KLEINDIENST: This is an e-mail that you
14 sent to Kenny Ortega, copy to James Phares, on October
15 8, 2009; correct?

16 A. Correct.

17 Q. And who is James Phares?

18 A. I believe he was Kenny Ortega's personal
19 assistant at the time.

20 Q. And in this e-mail, the original e-mail at the
21 bottom of the page, you say, "I was wondering if there
22 was anyway for my Mom and Grandma to also come to the MJ
23 premier?" Are you referring to the This Is It premier?

24 A. I believe so.

25 Q. And when you're referring to your grandma, is

1 correct?

2 A. May 16th, yep.

3 MS. KLEINDIENST: I'm going to ask the court
4 reporter mark this as Exhibit 594.

5 (Deposition Exhibit No. 594
6 was marked for identification.)

7 MS. KLEINDIENST: Can we go off the record
8 quickly to change the tape.

9 MR. FINALDI: Yeah.

10 THE VIDEOGRAPHER: This marks the end of DVD
11 number three. The time is 5:21 p.m. and we are off the
12 record.

13 (A recess was taken.)

14 THE VIDEOGRAPHER: This marks the beginning of
15 DVD number four in today's deposition of Mr. Wade
16 Robson. The time is 5:27 p.m. and we're back on the
17 record.

18 Q. BY MS. KLEINDIENST: So, we were looking at 594
19 when we went off the record. This is an e-mail from you
20 to Francois on May 21st, 2011; correct?

21 A. Yes.

22 Q. Who was Francois?

23 A. He was the director at the time of what was
24 going to be the Las Vegas Michael Jackson Cirque Du
25 Soleil show.

1 Q. In the, call it the third paragraph, you said,
2 "I always wanted to do this MJ show, badly." Do you see
3 that?

4 A. I do.

5 Q. Is that how you felt at the time?

6 A. I know I felt that way at some point. I don't
7 think that's how I felt at the time. I think at the
8 time I was still having a really hard time going through
9 this first breakdown and I had gotten to the point
10 where -- you know, nothing of any substance was really
11 going on in therapy, meaning I wasn't starting to talk
12 about the abuse or anything like that, and I, you know,
13 wasn't planning on it.

14 That -- all I knew to do was -- all I learned
15 from Michael was all I knew to do was get back to work
16 so I figured that's what I had to do. So, you know, I
17 think I was saying that in this e-mail because this was
18 something what would maybe, you know, help, in this
19 e-mail, me getting back involved. I felt that way at
20 some point but I don't know if I did here.

21 Q. In the middle of the page there's a paragraph
22 that starts with the word "Look." Do you see that?

23 A. Sorry, in the middle of the page. Yeah,
24 "Look," yeah.

25 Q. And you said, "Look, the Directing gig didn't

1 work out. It was consuming me in an unhealthy way that
2 I wasn't ok with being a brand new father. Maybe it
3 just wasn't the right time. Maybe I just wasn't ready
4 to direct a studio film."

5 Is that how you felt on May 21st, 2011?

6 A. The first part of it, "It was consuming me in
7 an unhealthy way that I wasn't ok with being a brand new
8 father. Maybe it just wasn't the right time," that was
9 definitely how I felt at the time that I wrote this.
10 "Maybe I just wasn't ready to direct a studio film"; I
11 don't know that I felt that way. I mean, that was a
12 question that was in my mind at this point, before I
13 understood what was really going on.

14 MS. KLEINDIENST: I'm going to ask the court
15 reporter to mark this as Exhibit 595.

16 (Deposition Exhibit No. 595
17 was marked for identification.)

18 (Witness peruses exhibit.)

19 THE WITNESS: Okay.

20 Q. BY MS. KLEINDIENST: This is an e-mail that you
21 sent to Erik Feig, Meredith Milton, Jennifer Gibgot,
22 Matt Smith and Adam Shankman on May 22nd, 2011; correct?

23 A. Correct.

24 Q. And in this e-mail you attempt to explain what
25 happened and why you quit Step Up 4; correct?

1 don't remember though.

2 Q. Was it prior to May 8th, 2012?

3 A. Was it prior to May 8th, 2012. I believe so.

4 Q. You've described having a second breakdown; is
5 that correct?

6 A. Yes.

7 Q. Do you recall when that happened?

8 A. So, the symptoms -- so, you know, I got back
9 to, as I stated, got back to work after the first
10 breakdown. Most notably I joined, rejoined the Cirque
11 show prep so I think somewhere in July, I believe, of
12 2011, and then started doing stage directing work for
13 other people, other artists, I think around August of
14 2011. So, I did a bunch of that work, multiple artists,
15 and then I was sort of, you know, I had, I had sewed
16 myself back up. I was just sort of, like, operating,
17 right, pushing hard.

18 And then, around, I believe around January of
19 2012 some of the, you know, symptoms started kind of
20 bubbling up. Fears and anxieties over, you know, the
21 kind of work I had been doing for ten, fifteen years.
22 You know, so, there was no external reason that I knew
23 of as far as the work or something like that that all of
24 a sudden this was scary or should be harder for me to
25 do.

1 So, these symptoms started bubbling up around
2 January, they were getting worse and worse and worse,
3 until I believe somewhere in March 2012 was when, you
4 know, I was really falling apart again and I wasn't -- I
5 was beginning to not operate well and I think around
6 March removed myself from several jobs that I was
7 involved in.

8 Q. Do you remember if it was early or late March
9 that you removed yourself from those jobs?

10 A. I don't. Don't remember.

11 Q. You started seeing Dr. Larry Shaw around that
12 time; right?

13 A. I believe in April of 2012.

14 Q. Do you recall how long it was after you removed
15 yourself from those jobs before you started seeing Dr.
16 Shaw?

17 A. Not exactly but it's in the range of a month.

18 Q. How did you find Dr. Shaw?

19 A. I was -- I had started going to yoga at Exhale
20 in Venice around that time, once I removed myself from
21 the jobs, somewhere in late March maybe, and my sister
22 was going with me. And one of the other, one of the
23 teachers there, who I didn't take from but that my
24 sister knew, was a therapist of some kind, like, more of
25 a, kind of holistic somatic therapist. Anyway, my

1 sister asked her for any recommendations for me for any
2 therapist and she recommended Dr. Larry Shaw. I looked
3 him up online and called him, and then started with him.

4 Q. How long after you received the recommendation
5 did you first see Dr. Shaw, approximately?

6 A. I would say within a two-week range. Sorry,
7 did you say did I see Dr. Shaw?

8 Q. Yes.

9 A. Two- to three-week range.

10 Q. Did you look for any other therapist or did you
11 just go with Dr. Shaw?

12 A. I can't remember.

13 Q. Do you recall the name of the person who
14 recommended Dr. Shaw?

15 A. No, I don't. I didn't know her. Someone my
16 sister knew.

17 Q. By the time you stopped, you started seeing Dr.
18 Shaw, had you stopped working completely?

19 A. I believe so. Hold on. I'm not sure. I
20 believe so. I mean, I definitely wasn't doing any sort
21 of active jobs. The only thing I'm questioning in my
22 mind is that the prospect of me doing the Michael
23 Jackson Vegas Cirque show with the new director, I'm not
24 sure if that was still, the prospect of me doing it was
25 still lingering, possibly, once I started with Dr. Shaw.

1 I don't remember that exact timing. I think it was
2 around this range that I officially, you know, pulled
3 out of that again. Not sure the exact timing.

4 MS. KLEINDIENST: Going to ask the court
5 reporter to mark this as Exhibit 597.

6 (Deposition Exhibit No. 597
7 was marked for identification.)

8 (Witness peruses exhibit.)

9 Q. BY MS. KLEINDIENST: And my only question about
10 this document is whether this is your handwriting.

11 A. Yes, I believe so.

12 Q. So this is a document that you filled out?

13 A. Yes.

14 Q. Your father's name was Dennis Robson; correct?

15 A. Correct.

16 Q. And he killed himself; correct?

17 A. Correct.

18 Q. What date did he kill himself?

19 A. I don't remember the exact date. I believe it
20 was in July of 2002.

21 Q. Do you recall it being around the time that
22 your brother Shane moved to Los Angeles?

23 A. Yes.

24 Q. How close in time?

25 A. Like, within two to three days, I think.

1 have as much time for me. He didn't want me around as
2 much. If I wasn't doing the kinds of things he wanted
3 me to do, he didn't want me around so much.

4 Q. Then he'll cut you out?

5 A. Yeah.

6 Q. Can you turn to page 57. At the bottom of the
7 page you wrote, "At some point, my Mother decided that
8 we were going to move to America." Do you recall when
9 your mother decided to move to America?

10 A. Not beyond it being some, I believe some point
11 in '91.

12 Q. That you moved or that the decision was made?

13 A. The decision was made, yeah.

14 Q. You can set that aside.

15 Can you tell me every name of a person that you
16 recall who worked for Michael Jackson?

17 A. Norma Staikos, Evvy Tavasci I believe is her
18 last name, Bill Bray, Wayne Nagin or Nagin, however you
19 say it. The question was any name that I know of that
20 ever worked for Michael Jackson; right?

21 Q. That you recall.

22 A. That I recall, yeah.

23 Sandy Gallin, Gary Hearne, Gail, I'm not sure
24 of her last name. She worked at Neverland for a really
25 long time as a maid and/or head, head housemaid.

1 Q. Is that someone whose been deposed in this
2 case?

3 A. I believe so.

4 Blanca Francia. The Quindoys, Mark was the
5 man, I'm not sure if I remember the female's first name,
6 but they were chefs and possibly managers at Neverland
7 at some point. They were when I, the first time I went
8 to Neverland. I remember another one of the chefs,
9 Bucky was his first name. I don't remember his last
10 name. He was a chef at Neverland. I remember Grace, I
11 don't know if it's Rwaramba.

12 Q. Rwaramba?

13 A. Yeah, I think.

14 I remember Al, his nickname was Big Al, he ran
15 the amusement park at Neverland for many years. I don't
16 remember his last name. I remember Manuel who was a
17 security card I believe at some point and also worked at
18 Neverland and also worked in the theme park. Bill Bray.

19 Q. Anyone else?

20 A. Frank Dileo. There may be more that comes
21 forth for me. This is what I'm remembering at the
22 moment.

23 Q. Let me know if you think of anyone else.

24 A. Okay.

25 Q. You mentioned Evvy Tavasci or Tavasco?

1 A. Yeah. It's either Tavasci or Tavasco, I'm not
2 sure.

3 Q. Do you know what her role was?

4 A. She, like Norma, ran everything in Michael's
5 life. She was the boss along, along with Michael.

6 Q. Do you know what her position title was?

7 A. Evvy?

8 Q. Yeah.

9 A. I imagine it was at least personal assistant or
10 secretary, possibly some sort of executive at MJJ as
11 well.

12 Q. But you're not sure?

13 A. Not sure.

14 Q. Do you remember how many times you met Evvy?

15 A. Maybe in the range of six to ten times.

16 Q. Do you remember what she looks like?

17 A. My memory of her is having hair that was in the
18 shorter range, meaning, you know, like, five- to
19 seven-inch range, a sort of shorter do. Her hair color
20 being brownish to almost sort of auburn, maybe. I
21 remember her being on the taller side. I remember her
22 being white. Yeah.

23 Q. How about her age?

24 A. I remember her being in the -- not supposed to
25 say this about a woman; right? I would say fifties

1 range.

2 Q. In the '90s?

3 A. In the year, in the '90s?

4 MR. FINALDI: Calls for speculation.

5 THE WITNESS: When I was around her, which I
6 believe was in the range of, you know, around '93, '94.
7 I mean, I think all the way until he died. So, being in
8 the fifties range which could go either side on that
9 scale.

10 Q. BY MS. KLEINDIENST: How about her height?

11 A. Yeah, I remember her being what seemed like
12 taller, taller side for a woman which, I don't know,
13 maybe in the, like, maybe in the five-ten, five-nine,
14 range.

15 Q. Do you know what Bill Bray's position was?

16 A. I believe he was head of security for Michael
17 Jackson.

18 Q. How about Sandy Gallin?

19 A. I believe he was his manager, Michael's
20 manager.

21 Q. Grace Rwaramba?

22 A. She had multiple roles. I believe she started
23 working underneath Norma Staikos, I believe, in the
24 office, MJJ Productions' office, for a while. And then,
25 at some point she became, like, the nanny of Michael's

1 children.

2 Q. Do you remember when she started working in the
3 office?

4 A. No.

5 Q. Any idea?

6 A. No. I mean, she may have been there before I
7 met Michael in 1990, I don't know.

8 Q. How about Frank Dileo?

9 A. What about him?

10 Q. What was his position?

11 A. Michael's manager.

12 Q. So, you've named a number of people that we
13 just talked about. Do you believe that any of those
14 people could have prevented Michael Jackson from
15 sexually abusing you when you were a child?

16 A. Yes.

17 Q. Which person?

18 A. Any and all of them.

19 Q. You think all of them could?

20 A. Yeah.

21 Q. How?

22 A. Because they were in a scenario all the time
23 that they worked for Michael where Michael had me and
24 many other children around him, them knowing that he,
25 first of all, just was having little children with him

1 all the time.

2 Second of all, a certain amount of them, I
3 believe possibly all of them, knew that he was having me
4 and other children sleep in his bedroom with him, sleep
5 in his bed with him, buy them gifts, do all of this
6 stuff, have them with him, have me with him all the
7 time, and others with him constantly, that there's no
8 question in my mind now, as an adult, which they were
9 during all the time that they worked for Michael
10 Jackson, that that is very strange, inappropriate
11 behavior.

12 And my question would be, what the hell is
13 going on with Michael Jackson and these children. So,
14 instead of maybe putting themselves and their job ahead
15 of the interest of a child, they could have done
16 anything. They helped, you know, especially Norma
17 Staikos and Evvy Tavasc -- do we know if it's Tavasci or
18 Tavasco?

19 Q. I know. Do you?

20 A. I'm not sure.

21 Q. Okay.

22 MR. FINALDI: It's Tavasci.

23 THE WITNESS: Tavasci?

24 MR. FINALDI: Yeah.

25 Q. BY MS. KLEINDIENST: So Evvy Tavasci --

1 A. I'm not done. Norma Staikos, Evvy Tavasci,
2 were organizing all of these meetings between myself and
3 Michael, organizing the details, organizing the details
4 to pick me up, to take me, drop me off at Michael's, to
5 fly me to Michael. Michael was like a child in a lot of
6 ways. Michael was like a child in a lot of ways, like,
7 he could do his work, he could do his art, right, but
8 beyond that, everyday life stuff, I mean, he could
9 heartily work a microwave. So, Michael wasn't organizing
10 any of that stuff, they were helping to facilitate all
11 of that stuff.

12 So, at some point, you know, they had the, they
13 all had the ability to either help in the facilitation
14 of this weird shit that was going on between Michael and
15 I and many other kids, or not help, say something to an
16 authority that, you know, we believe something weird is
17 going on here. There's so many things they could have
18 done. They could have said something to Michael.

19 Q. There's a lot to unpack there. Do you know or
20 do you have any personal knowledge that any of these
21 people knew that Michael Jackson was sexually abusing
22 children?

23 A. I believe they had a very good idea that that
24 was going on.

25 Q. I asked a slightly different question. Do you

1 know whether any of these people knew that Michael
2 Jackson was sexually abusing children?

3 MR. FINALDI: Asked and answered,
4 argumentative. He just answered your question.

5 THE WITNESS: I, I mentioned Blanca Francia on
6 that list; right?

7 MS. KLEINDIENST: You did.

8 THE WITNESS: Yeah. I know that she saw
9 explicit stuff.

10 Q. BY MS. KLEINDIENST: How do you know that?

11 A. From her testimony.

12 Q. Any other way that you know that?

13 A. No.

14 Q. Anyone else?

15 A. Do I know for sure that they saw anything, any
16 explicit sexual abuse, and when I say explicit sexual
17 abuse I mean, you know, oral sex, all of that, do I know
18 that they explicitly saw any of that; no, I don't know.

19 Q. And you are aware that Michael Jackson was
20 criminally investigated by the police in the early 1990s
21 for childhood sexual abuse; correct?

22 A. Yes, I'm aware of that.

23 Q. Okay. So the authorities were contacted;
24 correct?

25 A. The authorities got involved. I know that.

1 Q. After the authorities got involved you
2 continued to sleep in Michael Jackson's bed; is that
3 correct?

4 A. That is correct.

5 Q. And your mother allowed you to sleep in Michael
6 Jackson's bed after he had been criminally investigated
7 for childhood sexual abuse; correct?

8 A. Unfortunately, yes.

9 Q. Do you believe that any of the people that
10 you've listed that worked for Michael Jackson were in a
11 better position to know that or to suspect that
12 something was happening with you in particular than your
13 mother?

14 A. Yeah.

15 Q. Who?

16 A. Who on that list?

17 Q. Yes.

18 A. At least Norma, at least Evvy, at least Wayne
19 Nagin, Blanca Francia. At least them.

20 Q. Why do you believe that Norma Staikos was in a
21 better position to suspect that you were being sexually
22 abused than your mother?

23 A. Because Norma Staikos had been working for
24 Michael for a long period of time and had been helping
25 to facilitate every one of these relationships and,

1 therefore, I believe sexual abuse, first, of many other
2 children, and most importantly of me. So, she had been
3 witness to so many more things than my mother and a real
4 pattern at the very least.

5 Q. How do you know that; is it because she had
6 worked for Michael Jackson?

7 A. Yeah.

8 Q. Is there any other reason that you think that?

9 A. Because I know all that she organized for my
10 and Michael's relationship. All the meetings and all
11 the gifts. And I know and I believe that she did that
12 for many others.

13 Q. Why do you believe that?

14 A. Because he had relationships with many other
15 young boys, and maybe girls as well, that, you know, I
16 know that that's the reason he had those relationships.
17 She would have been facilitating the same kind of stuff
18 with them as she did with me.

19 Q. How do you know about those relationships; is
20 it because you saw those kids at Neverland or other
21 places around Michael Jackson?

22 A. Yeah, some of it is that. There was often when
23 I was around other kids that he had relationships with,
24 like Brett Barnes, like Macaulay Culkin, like Jordan
25 Chandler. So, yeah, that. And then, it was also,

1 Michael was seen even beyond that, beyond my immediate
2 knowledge, with other children all the time.

3 Q. The first time that you were, or, that you
4 claim that you were sexually abused by Michael Jackson
5 happened on your first trip to the United States;
6 correct?

7 A. Yes.

8 Q. And it happened at Neverland?

9 A. Yes.

10 Q. At that time, the first time that you were
11 sexually abused, were there any concrete actions that
12 Norma Staikos could have taken to prevent that?

13 A. Yeah. She could have not facilitated the trip.
14 She could have at any time before that, at any time
15 during that, she could have called the authorities on
16 Michael if she wanted to.

17 Q. Okay, so --

18 A. If she had the guts to.

19 Q. As of January 1990, the concrete actions that
20 you claim that Norma Staikos could have taken to prevent
21 you from being abused are not set up your meeting with
22 him at Record One?

23 A. Right.

24 Q. Or call the authorities?

25 A. You talking specifically just about that first

1 trip?

2 Q. Yes.

3 A. Yeah. Not set up the meeting, call the
4 authorities, say something to Michael.

5 Q. Do you think that if Norma Staikos said
6 something to Michael, that would have prevented the
7 abuse?

8 MR. FINALDI: Calls for speculation.

9 THE WITNESS: I have no idea.

10 Q. BY MS. KLEINDIENST: Okay, so, you believe that
11 Norma Staikos should not have set up the meeting between
12 you and your family and Michael at Record One; correct?

13 A. Correct. She was the first line of defense,
14 meaning, you know, it was Norma that my mother got in
15 contact with first, right, that led to me meeting
16 Michael again. I don't know exactly how long she had
17 worked for him.

18 Q. At that time, that point?

19 A. At that point. I believe it was at least a
20 year or more, maybe several years.

21 Q. But you don't know?

22 A. I don't know for sure exactly what amount of
23 time. But it wasn't, you know, a couple weeks prior or
24 a couple months prior, it was definitely more than that.
25 So, there's no question in my mind that she had been,

1 again, privy to all of his patterns with children and
2 any sensible adult who was that close, knowing almost
3 everything about what Michael did with his every single
4 day because she scheduled it, she told him to be there,
5 she told him to get on one phone call, where to be, at
6 what meeting, everything, for her to then be the
7 gatekeeper, the one that sent me by setting up this
8 meeting into a pedophile's hand.

9 Q. So, it's your testimony that Norma Staikos, who
10 was Michael Jackson's secretary, should not have
11 scheduled the meeting between your family and Michael
12 Jackson at Record One --

13 MR. FINALDI: Assumes facts.

14 Q. BY MS. KLEINDIENST: -- and that would have
15 prevented the abuse?

16 MR. FINALDI: Assumes facts not in evidence,
17 asked and answered, argumentative.

18 THE WITNESS: There's a lot of things in there.
19 First, she was at least his personal
20 assistant/secretary. I believe she may have had a one,
21 a bigger title than that, like, sort of an executive of
22 some level of MJJ Productions, or the executive. I
23 believe she did. Even if not, that's what she was
24 doing. She wasn't I think the -- the, the title of
25 secretary or personal assistant doesn't speak to the

1 ability and the power that she had over Michael's life,
2 organizing all the details of Michael's life. So,
3 that's the first point in that statement.

4 And then, what else did you say, that if --
5 sorry.

6 Q. BY MS. KLEINDIENST: It was a yes-or-no
7 question, so, unless you have more to your answer.

8 A. You also asked do I believe that it would have
9 prevented the abuse if she didn't set up the meeting.
10 Well, yeah, because I never would have met with him. He
11 didn't know about me again until she made the
12 connection.

13 Q. Who do you think is more responsible for the
14 abuse that happened that weekend, your mother or Norma
15 Staikos?

16 MR. FINALDI: Calls for legal conclusion,
17 invades the province of the jury.

18 Answer.

19 THE WITNESS: Responsible in what way; just as
20 a human matter?

21 MS. KLEINDIENST: I'll withdraw the question.

22 Can we take a quick break?

23 MR. FINALDI: Sure.

24 THE VIDEOGRAPHER: The time is 6:44 p.m. and
25 we're off the record.

1 The only thing I remember that comes close to that
2 concept, I believe, if my memory serves me correctly,
3 that the time period was within the breakdown, the
4 second breakdown in 2012.

5 And at some point in that breakdown, me, not
6 doing well emotionally, having the thought and I guess
7 expressing the thought that maybe, something in relation
8 to the idea of me getting back to work again like I did
9 the breakdown before. And my wife and our family had
10 been through so much, was going through so much with
11 these breakdowns, that, you know -- I'm saying this
12 speaks to her reaction. The first breakdown, when I did
13 that small amount of therapy with Dr. Cameron and then
14 relatively quickly ended up getting back to work, seemed
15 like I was all good, right, and then, within a year,
16 right, or by March or whatever, in 2012, another
17 breakdown happens, right.

18 So then, post that, some point in that second
19 breakdown something was expressed about, from me, about
20 the idea of me going back to work, and based on what my
21 wife had just been through the last time I went back to
22 work and then here we are again in a breakdown, she was
23 so stressed out, understandably, that she, you know,
24 expressed something along the lines of, like, if you are
25 going to do the same thing again, like, meaning not get

1 to the bottom of and start healing what's going on with
2 you and just kind of go back to work, are we going to
3 end up in this same sort of cyclical thing again.

4 And in tears and in extreme stress, you know,
5 she expressed something along the lines like, "I don't
6 know if I can do that. If that's what you're going to
7 do, not get healed, you know, not really work on
8 yourself, I don't know that we can keep going through
9 that. I don't know if I can keep, you know, Koa, if I
10 can stay around, if I can keep Koa around for that."

11 And, you know what, thank God she did that
12 because that was -- it scared the hell out of me. And
13 so, that was one of the moments that really gave me even
14 more of an impetus to, you know, jump all the way into,
15 to healing, into therapy, and to, yeah, into healing.

16 Q. But did you take that as actual threat that she
17 was going to leave you?

18 A. A threat. I mean, yeah, that's what it said.
19 She said, you know, "If you're going to do this again,
20 if you're going to go back to work and maybe we're going
21 to end up in this same sort of cyclical thing, I don't
22 know if I can stay around for that."

23 Q. And you think that was sometime around March or
24 April of 2012?

25 A. I believe so.

1 Q. Can you turn to the page that's marked 4319 at
2 the bottom. At the top of the page, the second bullet
3 point, which is an italicized note that you added, it
4 states, "My story of abuse and its effects will make me
5 relatable/relevant." Why do you think that your story
6 of abuse makes you relatable and relevant?

7 A. I believe that it, in relation to -- in the
8 course of studying this -- this knowledge came from my
9 meditation teacher. So, I learned and practiced and
10 still practice Veda meditation. And before I took this
11 course I became interested in the idea of becoming a
12 teacher of Vedic meditation myself.

13 I believe what that's referring to is where the
14 teacher was talking about how as teachers of meditation,
15 you know, not everybody wants to learn meditation from
16 the same kind of person with the same life story.
17 Meaning, you know, people who are surfers more than
18 likely would love to learn meditation from a guy or a
19 girl who is also a surfer. They can relate to them.

20 And so, that's in relation to me having gone
21 through trauma in my childhood and there being a lot of
22 people who have gone through trauma in their childhood
23 and that, in relation to being a Vedic meditation
24 teacher, that's one of the pieces of my life that would
25 make me relatable to a certain amount of people who have

1 been through similar things in childhood as I did.

2 MS. KLEINDIENST: I'm going to ask the court
3 reporter to mark this as Exhibit 603.

4 (Deposition Exhibit No. 603
5 was marked for identification.)

6 Q. BY MS. KLEINDIENST: And do you recognize this
7 as another example of your written thoughts, this one
8 from October 18th to 27th, 2013?

9 A. Just give it a scan.

10 (Witness peruses exhibit.)

11 Yes, this looks like writings of my thoughts.

12 Q. From October 18th to 27th, 2013?

13 A. Yep.

14 MS. KLEINDIENST: I'm going to ask the court
15 reporter to mark this as Exhibit 604.

16 (Deposition Exhibit No. 604
17 was marked for identification.)

18 Q. BY MS. KLEINDIENST: And this is another
19 example of your writings of your thoughts, this one from
20 April 13th, 2015; correct?

21 A. Going to scan it.

22 (Witness peruses exhibit.)

23 Yes, looks like writings of my thoughts from
24 April 13, 2015.

25 Q. Have you had a chance to basically review what

1 you were writing about?

2 A. No. Really quickly. Let me give it a better
3 read.

4 (Witness peruses exhibit.)

5 Yep.

6 Q. The last sentence says, "It's time for me to
7 get mine!" Do you know what you meant by that?

8 A. I don't.

9 Q. You don't remember?

10 MR. FINALDI: Asked and answered.

11 THE WITNESS: I don't.

12 MS. KLEINDIENST: I think we're at our seven
13 hours so I'm assuming that you're not going to
14 voluntarily allow us to go more than seven hours; is
15 that correct?

16 MR. FINALDI: I don't think it's necessary.

17 MS. KLEINDIENST: And you're not going to;
18 correct?

19 MR. FINALDI: Do you think it's necessary?

20 MS. KLEINDIENST: I mean, I have plenty more
21 questions.

22 MR. FINALDI: You can ask questions all day
23 but, no, I don't see any justification for it.

24 MS. KLEINDIENST: Okay, so, my question is,
25 you're not going to stipulate for us to go more than