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FILED
SUPERIOR COURT OF CALIFORNIA
COUNTY OF SANTA BARBARA

JAN 10 2005

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

*Unsealed
pursuant to
Cellebros court
Order*

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

18 THE PEOPLE OF THE STATE OF CALIFORNIA,)
19 Plaintiff,)
20 vs.)
21 MICHAEL JOSEPH JACKSON)
22 Defendant.)

CASE NO. 1133603

MR. JACKSON'S SUPPLEMENT TO
OPPOSITION TO MOTION TO QUASH
VENTURA AND BANK OF THE WEST
SUBPOENAS

TIME: 8:30 a.m.
DATE: January 14, 2005
PLACE: Department SM-2

FILED UNDER SEAL AND IN CAMERA

26 I, Brian Oxman, declare and say:

27 1. I am an attorney at law admitted to practice before all the courts of the State of California and I
28 am an attorney for Michael Jackson. I submit this Supplemental Declaration in Opposition to Motion to

1 Quash Ventura and Bank of the West Subpoenas. On January 7, 2005, Mr. Jackson filed his Opposition to
2 Maria and David Ventura's Motion to Quash. Included in that opposition was a copy of check number
3 10893 in the amount of \$10,000.00 drawn on the account of Louise Palanker dated July 10, 2000, and made
4 payable to David Arvizo, which was deposited into Maria Ventura's bank account. (Exhibit "D" attached
5 to the January 7, 2005, Memorandum).

6 2. After filing the opposition, Mr. Jackson's attorneys recognized that the did not include the
7 second check from Ms. Palanker dated June 15, 2000, made payable to Janet Arvizo, in the amount of
8 \$10,000.00. (Exhibit "S" attached to this Memorandum). This check was also deposited into the account
9 of her mother, Maria Ventura, at Sanwa Bank, although the account number is different from the July 10,
10 2000, check, and Maria and David Ventura appear to have two (2) accounts at Sanwa Bank. The fact is
11 that Louise Palanker was defrauded out of two different payments for \$10,000.00 each, for a total of
12 \$20,000.00, based on Janet Arvizo's fraudulent representations that she had medical bills to pay and that
13 she needed money to pay them.

14 3. Janet Arvizo has maintained to her acquaintances that she had nothing to do with the first check
15 made payable to David Arvizo. However, that is untrue because the money was deposited into Maria
16 Ventura's account, and it was disbursed by Maria Ventura according instructions from her daughter, Janet
17 Arvizo. David Arvizo had no control or influence over Maria Ventura who is and was Janet Arvizo's
18 surrogate, mother, and "drop box."

19 4. Janet Arvizo has historically and habitually blamed David Arvizo for all of her fraudulent
20 activities. However, the truth is David Arvizo could not and did not direct the disposition of this check
21 because it was Janet Arvizo who "laundered" \$20,000.00 from Louise Palanker through Maria Ventura's
22 bank account. It doesn't matter to Mr. Jackson who among David or Janet Arvizo was responsible for the
23 fraud because the scheme has continued unabated to the present day perpetrated by Janet Arvizo in David
24 Arvizo's absence.

25 5. The blame game is irrelevant to this Court and to Mr. Jackson. Mr. Jackson requests this court
26 require production of all bank accounts David and Maria Ventura had at Sanwa Bank, which is now Bank
27 of the West. They have contentiously, since 2000, served as Janet Arvizo's laundering facility, to conceal
28

1 funds and facilitate fraud. Mr. Jackson has been a victim of that outrageous activity. The court should
2 require the Venturas and the Bank of the West to Comply with his subpoenas.

3 I declare under penalty of perjury under the laws of the State of California the foregoing is true and
4 correct.

5 Executed this 10th day of January, 2005, at Santa Fe Springs, California.

6
7 Respectfully submitted,

8 Thomas A. Mesereau, Jr.
9 Susan Yu
10 COLLINS, MESEREAU, REDDOCK & YU

11 Robert M. Sanger
12 SANGER & SWYSEN

13 Brian Oxman
14 OXMAN & JAROSCAK

15 By: 

16 R. Brian Oxman
17 Attorneys for defendant
18 Mr. Michael Jackson
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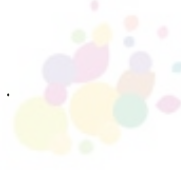


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Exhibit "S"



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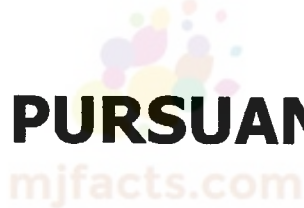
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EXHIBIT REDACTED

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