

JAN 24 2005

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

1 THOMAS W. SNEDDON, JR., DISTRICT ATTORNEY
County of Santa Barbara
2 By: RONALD I. ZONEN (State Bar No. 85094)
Senior Deputy District Attorney
3 J. GORDON AUCHINCLOSS (State Bar No. 150251)
Senior Deputy District Attorney
4 GERALD McC. FRANKLIN (State Bar No. 40171)
Senior Deputy District Attorney
5 1112 Santa Barbara Street
Santa Barbara, CA 93101
6 Telephone: (805) 568-2300
7 FAX: (805) 568-2398

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
9 FOR THE COUNTY OF SANTA BARBARA
10 SANTA MARIA DIVISION

11
12 THE PEOPLE OF THE STATE OF CALIFORNIA,
13 Plaintiff,
14 v.
15 MICHAEL JOE JACKSON,
16 Defendant.

No. 1133603
PLAINTIFF'S APPLICATION
FOR ORDER THAT DISTRICT
ATTORNEY AND SHERIFF MAY
MAKE A PUBLIC STATEMENT
REGARDING INFORMATION
"LEAKED" TO THE MEDIA;
PROPOSED STATEMENT
DATE: ~~January 28, 2005~~
TIME: ~~9:50 am~~
DEPT: TBA (Melville)

~~UNDER SEAL~~

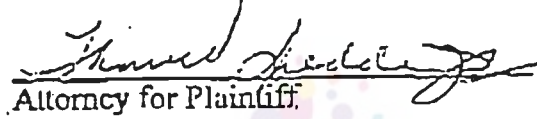
19
20 TO THE CLERK OF THE ABOVE-ENTITLED COURT:

21 Plaintiff respectfully requests that the Court issue an order that the District Attorney
22 and the Sheriff of Santa Barbara County may jointly issue a public statement concerning the
23 recent unfortunate "leak" to the media of confidential information concerning the background
24 and evidence in the above-captioned matter. This request is based on the interest of both
25 parties to due process and a fair trial.

26 ////
27 ////
28 ////

1 DATED: January 24, 2005.

2 THOMAS W. SNEDDON, JR.
3 District Attorney

4 
5 Attorney for Plaintiff



11 mjfacts.com



12 mjfacts.com



13 mjfacts.com



16 mjfacts.com



18 mjfacts.com



21 mjfacts.com



22 mjfacts.com



23 mjfacts.com



26 mjfacts.com



27 mjfacts.com

1 MEMORANDUM

2
3 THE SHERIFF AND DISTRICT ATTORNEY SHOULD BE ALLOWED
4 TO MAKE A PUBLIC STATEMENT CONCERNING THE UNLAWFUL
5 AND REGRETTABLE "LEAK" OF CONFIDENTIAL INFORMATION

6 The content of the transcript of the Grand Jury proceedings and certain investigative
7 reports in this case were leaked to the press by a person or persons presently unknown to Santa
8 Barbara County's District Attorney and Sheriff. That leak has properly been condemned by
9 defendant and his counsel. Defendant was authorized to make a public statement to mitigate
10 the prejudice to the defendant occasioned by that leak.

11 The District Attorney and Sheriff wish to join defendant in deploring the leak. The
12 District Attorney and Sheriff wish to solicit information from anyone who may be able to assist
13 them in discovering who is responsible for the leak.

14 A copy of the proposed statement of the Santa Barbara County Sheriff and District
15 attorney is attached.

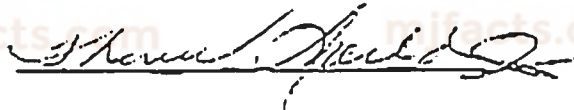
16 CONCLUSION

17 For the reasons set forth above, Plaintiff respectfully requests that the Court
18 authorize the Sheriff and the District Attorney to release the attached statement, with such
19 amendments as the Court may require.

20 DATED: January 24, 2005

21 Respectfully submitted,

22 THOMAS W. SNEDDON, JR.
23 District Attorney

24 
25
26
27
28



mjfacts.com



mjfacts.com



mjfacts.com



PRESS RELEASE



Santa Barbara County
Sheriff Jim Anderson

Santa Barbara County
District Attorney Tom Snodden

Recently there has been a noticeable increase in the release to the public of highly confidential transcripts, investigative reports, and documents about the Michael Jackson case. These materials are squarely covered by Judge Melville's Protective Order. We consider the release of these materials to be a violation of the law. Some media commentators have alleged that we are responsible for these leaks. We are not. These accusations are irresponsible, unfounded and untrue.

We are actively investigating this matter. In the meantime, if anybody has any information about who or under what circumstances these materials were released, please contact the Santa Barbara County Sheriff's Department, Detective Bureau at (805) 681-4150. Any individual wishing to provide written information should do so by registered receipt so full accountability for any information provided can be achieved.



mjfacts.com



mjfacts.com

PROOF OF SERVICE

STATE OF CALIFORNIA
COUNTY OF SANTA BARBARA } SS

I am a citizen of the United States and a resident of the County aforesaid; I am over the age of eighteen years and I am not a party to the within-entitled action. My business address is: District Attorney's Office; Courthouse; 1112 Santa Barbara Street, Santa Barbara, California 93101.

On January 24, 2005, I served the within PLAINTIFF'S SUPPLEMENTAL OPPOSITION TO DEFENDANT'S REQUEST THAT HEARING OF § 1108 MOTIONS BE HELD IN CAMERA on Defendant, by THOMAS A. MESEREAU, JR., ROBERT SANGER and BRIAN OXMAN, by personally delivering a true copy to Mr. Sanger's office and a true copy to be transmitted to Mr. Mesereau at the confidential facsimile number given us for their Santa Maria branch office, and then causing that copy to be mailed to Mr. Mesereau at the address shown on the Service List.

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

Executed at Santa Barbara, California on this 24th day of January, 2005.


Gerald McC. Franklin

SERVICE LIST

THOMAS A. MESEREAU, JR.
Collins, Mesereau, Reddock & Yu, LLP
1875 Century Park East, No. 700
Los Angeles, CA 90067
FAX: [CONFIDENTIAL]

Attorney for Defendant Michael Jackson

ROBERT SANGER, ESQ.
Sanger & Swyzen, Lawyers
233 E. Carrillo Street, Suite C
Santa Barbara, CA 93001
FAX: (805) 963-7311

Co-counsel for Defendant

BRIAN OXMAN, ESQ.
Oxman & Jaroscak, Lawyers
14126 E. Rosecrans Blvd.
Santa Fe Springs, CA 90670

Co-counsel for Defendant