

NOV 29 2004

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

1 THOMAS W. SNEDDON, JR., DISTRICT ATTORNEY  
County of Santa Barbara  
2 By: RONALD J. ZONEN (State Bar No. 85094)  
Senior Deputy District Attorney  
3 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

\*Unsealed  
pursuant to  
11/16/05 Court  
order

12 THE PEOPLE OF THE STATE OF CALIFORNIA,

13 Plaintiff,

14 v.

15 MICHAEL JOE JACKSON,

16 Defendant.

No. 1133603

17 PLAINTIFF'S PROPOSED  
18 PROTOCOL FOR EXPERTS'  
19 EXAMINATION OF EnCase  
20 COMPUTER HARDDRIVES

~~FILED UNDER SEAL~~

21 Plaintiff respectfully submits its Proposed Protocol for Experts' Examination of  
22 EnCase Computer Harddrives.

23 DATED: November 29, 2004

24 Respectfully submitted,

25 THOMAS W. SNEDDON, JR.  
26 District Attorney

27 By: Gerald McC. Franklin  
28 Gerald McC. Franklin, Senior Deputy

### Bradley Miller computers

Types of files (allocated, or erased and recoverable to be extracted from Bradley Miller computer hard drive evidence and provided to the Special Master for review. \*\* For reference, example file extensions are included with each file type. The listed file extensions are not meant to be an exhaustive list of the extensions to be searched for. We would like the examiner to include all file extensions recognized by EnCase, which relate to the given type of file.

1. Text files (.txt, .rtf)
  - a. These file types may contain writings, which discuss the victim/ family and the actions of Bradley Miller and his associates with regard to the victim/ family and Michael Jackson.
    - i. One must keep in mind the boundary overstepping on the part of Miller and his associates (stealing of materials from within the victim/ family possessions in storage, surreptitious audio recording, video taping the children, taking part in harassment of the family).
  - b. These file types could be invaluable in so far as showing the planning and execution of the conspiracy between Michael JACKSON and the unindicted co-conspirators.
2. Document files (.doc, .wpd, .ppt, pdf, .xls)
  - a. Same as #1
3. Picture files (.jpg, .bmp, .tiff, .psd)
  - a. May visually document Miller's (and/ or his associates' interaction and handling of the victim/ family and their belongings.
  - b. Picture files may also be used to identify individuals with places and time
    - i. Some picture files contain information as to when the picture was taken.
4. Movie files (.mpeg, .wmv)
  - a. Same as #3
  - b. Of particular note, Miller/ his associates secretly recorded the activities of the victim/ family
5. Sound files (.wav)
  - a. May contain audible documentation of Miller's (and/ or his associates' interaction and handling of the victim/ family and their belongings.
  - b. Of particular note, Miller/ his associates secretly recorded the activities of the victim/ family (Frank Cascio/ mother tape found at Miller's office)
6. Saved emails (.html)
  - a. Same as #1
7. Financial program files [Quicken, Microsoft Money] (.qdf, .qdb, .qdt)
  - a. Same as #1
    - i. These file types contain check register data, which oftentimes associates dates and locations with individuals, through purchase information.

- b. Additionally, this type of file may contain information showing the movement of monies between JACKSON and the unindicted co-conspirators.

The following is a list of Encase examination processes we would like performed on the Miller computer evidence files (in addition to extracting the above file types)

1. .html carver search
  - a. This may extract web page information including partial emails (see emails above)
2. graphic file search
  - a. This will search for deleted graphic files in the unallocated areas
3. file signature analysis
  - a. This will check to insure someone has not renamed the file extensions in order to hide the file.
    - i. Example taking a .jpg picture file and giving it a .exe executable file extension.
4. Key/ stringer word search of the unallocated areas. This will serve to narrow the information to be reviewed, thus minimizing the amount of information the Special Master will need to review Stringer words we feel are pertinent to the investigation are as follows:
  - a. CPS
  - b. Ventura
  - c. Arvizo
  - d. Davellin
  - e. David
  - f. Janet
  - g. Gavin
  - h. Star
  - i. Jackson
  - j. Michael
  - k. Jay
  - l. Asef or Asaf
  - m. Velchick or Vilchick
  - n. Chandler family
  - o. Cascio
  - p. Tyson
  - q. Frank
  - r. Omar
  - s. Aldo
  - t. Angel
  - u. Marie Nicole
  - v. Amen
  - w. Vincent
  - x. Vinnie

y. Bill  
z. Dickerman  
aa. Larry  
bb. Feldman  
cc. Brad  
dd. Miller  
ee. Tucker  
ff. Chris  
gg. Tucker  
hh. Aja  
ii. Pryor  
jj. Dieter  
kk. Wiesner  
ll. Alimorad  
mm. Farshchian  
nn. Evelyn  
oo. Tavasci  
pp. "Evvy"  
qq. Hamid  
rr. Moslehi  
ss. Jaime  
tt. Messada  
uu. Jesus  
vv. Salas  
ww. Ronald  
xx. "Ron"  
yy. Konitzer  
zz. Marc  
aaa. Fred  
bbb. Schaffel  
ccc. marijuana  
ddd. Martin  
eee. Bashir  
fff. MJJ Productions  
ggg. Santa Barbara District Attorney  
hhh. Sneddon  
iii. Santa Barbara Sheriff's Department  
jjj. Private eye (Johnny's Private Eye in the Sky)  
kkk. Bernstein, Fox, Whitman & Company LLP (accountants for MJ)  
lll. February  
mmm. March  
nnn. "Applehead"  
ooo. "Blow hole"  
ppp. "Doo Doo Head"  
qqq. Jesus Juice  
rrr. "Living with Michael Jackson"



sss. Applehead club  
 ttt. cancer  
 uuu. contract(s)  
 vv. death threats  
 www. Diary  
 xxx. Masturbation  
 yyy. masturbating  
 zzz. ejaculating  
 aaaa. ejaculation  
 bbbb. erection  
 cccc. interview  
 dddd. Forgery (signatures)  
 eeee. Kaiser Permanente  
 ffff. kidney(s)  
 gggg. money  
 hhhh. cash  
 iii. Notebook  
 jijj. Passports  
 kkkk. Phonebook  
 lll. Photos  
 mmmm. Pictures  
 nnnn. porn  
 oooo. Ranch logs  
 pppp. rebuttal  
 qqqq. receipts  
 rrr. secret  
 ssss. Security  
 tttt. tapes  
 uuuu. recordings  
 vv. Touching  
 www. underwear  
 xxxx. urine  
 yyyy. vaseline  
 zzzz. videos  
 aaaaa. Visas  
 bbbbb. Neverland  
 ccccc. El Monte  
 ddddd. Brazil  
 eeeee. Brazilian consulate  
 fffff. Dino's Storage  
 ggggg. State Department  
 hhhhh. Federal Building in L.A.  
 iiiii. Miami  
 jijjj. Turnberry Resort  
 kkkkk. Universal Hilton  
 lllll. John Burroughs school

mmmmmm. wine cellar

### Evelyn Tavasci computers

Types of files (allocated, or erased and recoverable to be extracted from Evelyn Tavasci's computer hard drive evidence and provided to the Special Master for review. \*\* For reference, example file extensions are included with each file type. The listed file extensions are not meant to be an exhaustive list of the extensions to be searched for. We would like the examiner to include all file extensions recognized by EnCase, which relate to the given type of file.

1. Text files (.txt, .rtf)
  - c. These file types may contain writings, which the activities of Michael JACKSON and/ or his close associates during February and March 2003.
2. Document files (.doc, .wpd, .ppt, pdf, .xls)
  - a. Same as #1
3. Picture files (.jpg, .bmp, .tiff, .psd)
  - a. Picture files may be used to identify individuals with places and time
    - i. Some picture files contain information as to when the picture was taken.
4. Movie files (.mpeg, .wmv)
  - a. Same as #3
5. Sound files (.wav)
  - a. May contain audible documentation pertaining to the activities of JACKSON and/ or his close associates during February and March 2003.
    - i. Digital recording of voice messages
    - ii. Dictations
6. Saved emails (.html)
  - a. Same as #1
7. Financial program files [Quicken, Microsoft Money] (.qdf, .qdb, .qdt)
  - a. Same as #1
    - i. These file types contain check register data, which oftentimes associates dates and locations with individuals, through purchase information.

The following is a list of Encase examination processes we would like performed on the Tavasci computer evidence files (in addition to extracting the above file types)

8. .html carver search
  - a. This may extract web page information including partial emails (see emails above)
9. Key/ stringer word search of the unallocated areas. The key word search of the unallocated areas can retrieve deleted and partially overwritten data from the file types documented above. This key word search will serve to narrow the information to be reviewed, thus minimizing the amount of information the Special Master will need to review. Absent the use of key words, a search of the

unallocated space would not be realistically feasible (akin to reading every book in a large library to find pertinent information) Stringer words we feel are pertinent to the investigation are as follows:

- a. CPS
- b. Ventura
- c. Arvizo
- d. Davellin
- e. David
- f. Janet
- g. Gavin
- h. Star
- i. Jackson
- j. Michael
- k. Jay
- l. Asef or Asaf
- m. Velchick or Vilchick
- n. Chandler family
- o. Cascio
- p. Tyson
- q. Frank
- r. Omar
- s. Aldo
- t. Angel
- u. Marie Nicole
- v. Amen
- w. Vincent
- x. Vinnie
- y. Bill
- z. Dickerman
- aa. Larry
- bb. Feldman
- cc. Brad
- dd. Miller
- ee. Tucker
- ff. Chris
- gg. Tucker
- hh. Aja
- ii. Pryor
- jj. Dieter
- kk. Wiesner
- ll. Alimorad
- mm. Farshchian
- nn. Evelyn
- oo. Tavasci
- pp. "Evvv"
- qq. Hamid

rr. Moslehi  
 ss. Jaime  
 tt. Messada  
 uu. Jesus  
 vv. Salas  
 ww. Ronald  
 xx. "Ron"  
 yy. Konitzer  
 zz. Marc  
 aaa. Fred  
 bbb. Schaffel  
 ccc. marijuana  
 ddd. Martin  
 eee. Bashir  
 fff. MJJ Productions  
 ggg. Santa Barbara District Attorney  
 hhh. Sneddon  
 iii. Santa Barbara Sheriff's Department  
 jjj. Private eye (Johnny's Private Eye in the Sky)  
 kkk. Bernstein, Fox, Whitman & Company LLP (accountants for MJ)  
 ll. February  
 mmm. March  
 nnn. "Applehead"  
 ooo. "Blow hole"  
 ppp. "Doo Doo Head"  
 qq. Jesus Juice  
 rrr. "Living with Michael Jackson"  
 sss. Applehead club  
 tt. cancer  
 uu. contract(s)  
 vv. death threats  
 www. Diary  
 xxx. Masturbation  
 yyy. masturbating  
 zzz. ejaculating  
 aaaa. ejaculation  
 bbbb. erection  
 cccc. interview  
 dddd. Forgery (signatures)  
 eeee. Kaiser Permanente  
 ffff. kidney(s)  
 gggg. money  
 hhhh. cash  
 iii. Notebook  
 jjj. Passports  
 kkkk. Phonebook



llll. Photos  
mmmm. Pictures  
nnnn. porn  
oooo. Ranch logs  
pppp. rebuttal  
qqqq. receipts  
rrrr. secret  
ssss. Security  
tttt. tapes  
uuuu. recordings  
vvvv. Touching  
wwww. underwear  
xxxx. urine  
yyyy. vaseline  
zzzz. videos  
aaaa. Visas  
bbbb. Neverland  
cccc. El Monte  
dddd. Brazil  
eeee. Brazilian consulate  
ffff. Dino's Storage  
gggg. State Department  
hhhh. Federal Building in L.A.  
iiii. Miami  
jjjj. Turnberry Resort  
kkkk. Universal Hilton  
llll. John Burroughs school  
mmmm. wine cellar