

1 SUPERIOR COURT OF THE STATE OF CALIFORNIA
2 IN AND FOR THE COUNTY OF SANTA BARBARA
3 SANTA MARIA BRANCH; COOK STREET DIVISION
4 DEPARTMENT SM-2 HON. RODNEY S. MELVILLE, JUDGE

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7 THE PEOPLE OF THE STATE OF)
8 CALIFORNIA,)
9 Plaintiff,)
10 -vs-) No. 1133603
11 MICHAEL JOE JACKSON,)
12 Defendant.)

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16 REPORTER'S TRANSCRIPT OF PROCEEDINGS

17

18 THURSDAY, MARCH 3, 2005

19

20 8:30 A.M.

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22 (PAGES 529 THROUGH 580)

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27 REPORTED MICHELE MATTSON McNEIL, RPR, CRR, CSR #3304

28 BY: Official Court Reporter 529

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1 I N D E X

2
3 Note: Mr. Sneddon is listed as "SN" on index.
4 Mr. Zonen is listed as "Z" on index. Mr. Auchincloss is listed as "A"
on index.
5 Mr. Mesereau is listed as "M" on index. Ms. Yu is listed as "Y" on
index.
6 Mr. Sanger is listed as "SA" on index. Mr. Oxman is listed as "O" on
index.

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8
9 PLAINTIFF'S WITNESSES DIRECT CROSS REDIRECT RECROSS

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11 LAFFERTY, Albert 534-S 547-SA (cont'd)
12 ARVIZO, Davellin 579-S

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1 E X H I B I T S

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3 FOR INPLAINTIFF'S NO. DESCRIPTION I.D. EVID.

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5 336 DVD 538 539

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1 Santa Maria, California
2 Thursday, March 3, 2005
3 8:30 a.m.

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5 THE COURT: Good morning.

6 COUNSEL AT COUNSEL TABLE: (In unison)

7 Good morning, Your Honor. Good morning, Your Honor.

8 THE JURY: (In unison) Good morning.

9 THE COURT: I told you that when I knew that
10 we were going to have a day that you weren't going
11 to be here, I would let you know as soon as I could.
12 And I'm going to do that right now.

13 BAILIFF CORTEZ: I'm sorry, Judge, they
14 can't hear you in the back, sir.

15 THE COURT: That's because my microphone's
16 off.

17 Next Friday, not this Friday, the 11th of
18 March, the jury will not come in. We are going to
19 have a day just of motions outside the presence of
20 the jury. So we've set up a whole day to do that.
21 And that will give you a nice break.

22 In addition to that, on Tuesday, next
23 week -- I don't have the date in front of me.

24 THE CLERK: It would be the 8th.

25 THE COURT: The 8th, we're going to stop one
26 hour early. And I have a meeting that afternoon, so
27 we'll go to -- we'll probably go to close to 12:00
28 and then stop. So it's not a day off, but it's an 533

1 afternoon off, I guess you'd say.
2 All right. Those are the only times right
3 now that I know that I can give to you.
4 Let's see, where were you. Are you ready to
5 proceed.
6 Do you want me to show the screen now.
7 MR. SNEDDON: I have a few questions first,
8 Your Honor. But we are going to use the DVD player,
9 so we can alert the Court to that.
10
11 ALBERT LAFFERTY
12 Having been previously sworn, resumed the
13 stand and testified further as follows:
14
15 DIRECT EXAMINATION (Continued)
16 BY MR. SNEDDON:
17 Q. Good morning.
18 A. Good morning.
19 Q. Deputy Lafferty, you told the ladies and
20 gentlemen of the jury yesterday that you were
21 involved in the execution of the search warrant on
22 Neverland Ranch on the 18th of November, 2003,
23 correct.
24 A. That's correct.
25 Q. Now, can you tell the ladies and gentlemen
26 of the jury, what time was it when you arrived on
27 the ranch that morning.
28 A. I arrived on the ranch property at 534

1 approximately 9:07 that morning.
2 Q. And I think you told us yesterday one of
3 your main responsibilities was to photograph the
4 interior of the main residence; is that correct.
5 A. To videotape the --
6 Q. Videotape.
7 A. That's correct.
8 Q. And did you keep time -- track of the time
9 in which you actually started your responsibilities
10 of videotaping the inside of the residence.
11 A. Yes, I did.
12 Q. Did you note that in a report.
13 A. Yes, I did.
14 Q. And what time was it that you started the
15 video of the interior of the main residence at
16 Neverland Valley Ranch.
17 A. I would have to look on my report to find
18 the exact --
19 Q. Do you have it with you.
20 A. I do have a copy of it.
21 Q. All right. Go ahead. See if that refreshes
22 your recollection.
23 A. At approximately 0955 hours I began the

24 video of the main residence.
25 Q. Now, later that same day, were you assigned
26 responsibilities in connection with documenting the
27 status of the inside of the interior when the
28 sheriff's department left. 535

1 A. Yes, I was.

2 Q. Would you explain to the ladies and
3 gentlemen of the jury what your responsibilities
4 were.

5 A. It's basically the same as I had done the
6 prewarrant service video. I retraced my steps the
7 same way, going back through the residence, showing
8 the condition of the residence after the search had
9 been completed.

10 Q. And do you recall what time you started
11 doing that particular video documentary.

12 A. If I could refer to my report for --

13 Q. Please. If you could.

14 A. At approximately 8:40 p.m., I was told that
15 the search had been completed in the main residence,
16 with the exception of the master bedroom area, and I
17 began the video of the residence at that time.

18 Q. Now, at some point that evening, did you
19 actually go up and video-document the main bedroom.

20 A. Yes, I did.

21 Q. The defendant's bedroom.

22 A. Yes, I did.

23 Q. What time did that start.

24 A. That was at approximately 10:38 p.m.

25 Q. And do you have in your notes the time that
26 you actually finished that project.

27 A. Yes, I do.

28 Q. What was that. 536

1 A. That was at 10:55 p.m.

2 Q. Now, after you left the defendant's bedroom,
3 did you do any more video-documenting before you
4 left the house.

5 A. Yes, I did.

6 Q. Would you tell the ladies and gentlemen of
7 the jury what it was you did.

8 A. Prior to leaving the residence, I went back
9 into the dining room, I believe what would be the
10 formal dining room area of the residence, and
11 videotaped copies of the search warrant and the
12 property, itemized list of the items that were taken
13 from the residence during the search warrant. They
14 were laid out on the dining room table and videoed
15 the fact that they had been left at the residence.

16 Q. Were there people actually present when you
17 did that.
18 A. Yes, there were.
19 Q. Who was present, to your knowledge.
20 A. I believe it was Sergeant Robel and
21 Lieutenant Klapakis.
22 Q. Were there any representatives of Mr.
23 Jackson there.
24 A. Yes, there were.
25 Q. Do you remember her name, or their name.
26 A. I believe her name was Violet. I don't
27 recall the last name.
28 Q. Okay. And then did you prepare a report 537

1 documenting the times at which you performed the
2 various functions you've told the ladies and
3 gentlemen of the jury about.

4 A. Yes, I did.

5 Q. You incorporated that into an official Santa
6 Barbara Sheriff's Department report.

7 A. Yes, I did.

8 Q. Now, with regard to the film that you took
9 on the occasion of the 18th, what did you do with
10 that film.

11 A. That evening, when I returned to the
12 station, it was secured in a locked locker within
13 our forensics unit property area. And then at a
14 later date, it was booked into evidence.

15 MR. SNEDDON: Your Honor, I have an exhibit
16 which I've had marked -- premarked, with the help of
17 the court clerk, as 336. It's a DVD. And counsel
18 has a copy of it, but -- may I approach the witness
19 for just a second with this, Your Honor.

20 THE COURT: Yes.

21 Q. BY MR. SNEDDON: I'm going to stay here
22 because I'm going to ask you a few questions and
23 walk back.

24 The particular exhibit marked as 336, the
25 DVD inside of that container there, have you had an
26 occasion to view that before you came to court.

27 A. Yes, I did.

28 Q. Does that contain the product of your 538

1 walk-through of the ranch on the 18th of November of
2 2003.

3 A. Yes, it does.

4 Q. All right.

5 MR. SNEDDON: Move that People's Exhibit 336
6 be admitted into evidence.

7 MR. SANGER: No objection, Your Honor.

8 THE COURT: All right. It's admitted.
9 MR. SNEDDON: Your Honor, I propose to play
10 this for the jury now, with the Court's permission.
11 THE COURT: All right. How long is it.
12 MR. SNEDDON: It's, I would say, 12 minutes,
13 something like that. Between ten and 12 minutes,
14 Your Honor.
15 THE COURT: Thank you.
16 MR. SNEDDON: And -- don't start it.
17 With the Court's permission, we may stop it
18 from time to time to ask the officer a comment on
19 certain locations.
20 THE COURT: Of course.
21 MR. SNEDDON: Can you do that.
22 (Whereupon, a portion of a DVD, People's
23 Exhibit 336, was played for the Court.)
24 Q. BY MR. SNEDDON: Now, Deputy Lafferty, what
25 is being depicted on the scene up there on the
26 screen right now.
27 A. This is the view from just outside the main
28 entry door of the main residence on the ranch. 539

1 MR. SNEDDON: All right. Go ahead.
2 Your Honor, for purposes of the record, when
3 we stop it, we have a recorder, we can reference the
4 point on the tape for the Court for the record.
5 Would that be appropriate.
6 THE COURT: You may do that.
7 MR. SNEDDON: This would be at 00.17. Thank
8 you. Go ahead.
9 (Whereupon, a portion of a DVD, People's
10 Exhibit 336, was played for the Court.)
11 Q. BY MR. SNEDDON: Now, Detective Lafferty, do
12 you recognize the area on the video where we've
13 stopped it at this point.
14 A. Yes, I do.
15 Q. And what is that.
16 A. This is just inside of the main door,
17 looking to the right as you would face the door from
18 the exterior. And it's a view looking down the
19 hallway towards the master bedroom area.
20 MR. SNEDDON: This would be at 00.29. All
21 right. Go ahead.
22 (Whereupon, a portion of a DVD, People's
23 Exhibit 336, was played for the Court.)
24 Q. BY MR. SNEDDON: Now, do you recognize
25 what's at the still at this particular point on the
26 documentary.
27 A. Yes, I do.
28 Q. What's that. 540

1 A. This is an area that had a large number of
2 items in reference to where it is in the residence.
3 It's -- as you enter through the front door, if you
4 would proceed straight through the foyer to that,
5 and then turn to the left.
6 MR. SNEDDON: Okay. That's at 00.39. Go
7 ahead.
8 (Whereupon, a portion of a DVD, People's
9 Exhibit 336, was played for the Court.)
10 MR. SNEDDON: Stop it right there.
11 Q. Now, we're at a point on the video, which is
12 01.40. Can you tell us what this shows.
13 A. This is the hallway leading from the foyer
14 area towards the master bedroom.
15 Q. Do you see in this photograph the master
16 bedroom doors.
17 A. There's a small portion of it visible, yes.
18 Q. Would you show that to the ladies and
19 gentlemen of the jury.
20 A. It's the dark brown door here to the -- to
21 the right of the screen.
22 MR. SNEDDON: All right. Go ahead.
23 (Whereupon, a portion of a DVD, People's
24 Exhibit 336, was played for the Court.)
25 MR. SNEDDON: Stop.
26 Q. Now, we're at 01.44. Could you tell the
27 ladies and gentlemen of the jury what's depicted
28 here. 541

1 A. This is a view looking down. It's just the
2 inside of the door, the prior stop, the master
3 bedroom door, just inside there.
4 Q. So we're at the entrance of the master
5 bedroom.
6 A. Just inside of that, yes.
7 MR. SNEDDON: All right. Go ahead.
8 (Whereupon, a portion of a DVD, People's
9 Exhibit 336, was played for the Court.)
10 MR. SNEDDON: All right. Stop.
11 Q. All right. Deputy Lafferty, we're at 02.19
12 on the video. What is depicted where we stopped it.
13 A. This is a staircase leading up to the bed
14 area and the master bedroom.
15 Q. We're still inside the suite, the bedroom
16 area.
17 A. That's correct.
18 MR. SNEDDON: Go ahead. Play it.
19 (Whereupon, a portion of a DVD, People's
20 Exhibit 336, was played for the Court.)
21 MR. SNEDDON: All right. Go ahead. Keep
22 going. All right. Stop it there.

23 Q. Now, we're at a point on the video which is
24 03.07. Would you tell the ladies and gentlemen of
25 the jury where you're located approximately in the
26 bedroom at this point.
27 A. This is just up at the top landing of the
28 stairs starting to turn to the right. 542

1 MR. SNEDDON: All right. Go ahead.
2 (Whereupon, a portion of a DVD, People's
3 Exhibit 336, was played for the Court.)
4 MR. SNEDDON: Stop.

5 Q. Now, we're at a point at four -- 04.48. Can
6 you tell the ladies and gentlemen of the jury where
7 we are in that particular portion of the house at
8 this point in the video documentary.

9 A. This is still in the master bedroom suite
10 back down on the first level. Just inside, actually
11 behind us, would be the main entry door, just
12 starting to go towards the left.

13 MR. SNEDDON: All right. Go ahead.
14 (Whereupon, a portion of a DVD, People's
15 Exhibit 336, was played for the Court.)

16 Q. BY MR. SNEDDON: All right. Deputy, could
17 you tell the ladies and gentlemen of the jury where
18 we are at this point.

19 A. This is the doorway leading into the master
20 bedroom/bath area.

21 MR. SNEDDON: And this is at 05.14. All
22 right. Go ahead.

23 (Whereupon, a portion of a DVD, People's
24 Exhibit 336, was played for the Court.)

25 MR. SNEDDON: All right. Stop it.

26 Q. Now, where are we on the documentary at this
27 point.

28 A. This is just exiting the bathroom area back 543

1 into a sitting area, which is the first room you
2 come into as you enter the master bedroom suite.

3 MR. SNEDDON: All right. We're at 06.54.
4 Go ahead.

5 (Whereupon, a portion of a DVD, People's
6 Exhibit 336, was played for the Court.)

7 MR. SNEDDON: Stop.

8 Q. Now, Deputy Lafferty, with regard to the
9 documentation of the search of Neverland Valley
10 Ranch on November 18th, did you also have other
11 responsibilities after you had completed the video
12 documentary.

13 A. Yes, I did.

14 Q. What was that.

15 A. To assist Detective Clark in taking still
16 photographs of items that was requested by the
17 searching people at the location.
18 Q. Would you describe to the ladies and
19 gentlemen of the jury how that process worked.
20 A. We stood by and the people who -- when the
21 warrant was executed, there were different teams
22 that were assigned to search various locations.
23 When those people would conduct a search and find an
24 item that they would like to have documented, they
25 would contact us, and we would go and take still
26 photographs of that item before it was collected.
27 Q. When you say to the ladies and gentlemen of
28 the jury "before it was collected," does that mean 544

1 where it is before it's either touched or picked up.

2 A. To the best of our knowledge, yes.

3 Q. And then you would take a photograph of
4 that.

5 A. That's correct.

6 Q. And with regard to the area that we've just
7 seen in the photograph that you've described as the
8 master bedroom and the - the first floor and second
9 floor, okay. - were you involved in

10 photo-documenting the location of items that were
11 taken from this particular area of the house.

12 A. There were only a few items that I took
13 photographs of. The majority of that was done by
14 Detective Clark.

15 Q. So there were two of you there doing that.

16 A. Yes.

17 Q. But you were responsible for taking some of
18 the photographs.

19 All right. Go ahead. Move on.

20 (Whereupon, a portion of a DVD, People's
21 Exhibit 336, was played for the Court.)

22 Q. Let's stop right here. That's a good place
23 right away. Do you recognize this room.

24 A. Yes, I do.

25 Q. Would you tell the ladies and gentlemen what
26 this room is, where it's located in the house
27 generally.

28 A. This room was a room that we refer to as the 545

1 doll room. It consists of a lot of dolls in there.

2 It's located on the second level of the main
3 residence outside of the master suite. As you enter
4 the end of the foyer, there was a staircase to the
5 right-hand side as you followed the stairs up.

6 When you reached the second story, you went

7 to the left side, which the room is located on
8 the -- what would be the northwest area of the
9 floor.

10 MR. SNEDDON: All right. Go ahead.

11 (Whereupon, a portion of a DVD, People's
12 Exhibit 336, was played for the Court.)

13 MR. SNEDDON: All right. Stop.

14 Q. Now, we've obviously moved into another
15 room. And we've stopped it at 08.14. Could you
16 tell the ladies and gentlemen of the jury what this
17 particular room is.

18 A. This is a room that we referred to as the
19 toy room. It is located off of what we referred to
20 as the doll room. It would be on the west side of
21 that location. As you went through shortly before
22 this picture, you entered a rest room area, and
23 would proceed to the right. It went through another
24 door which led into this room.

25 MR. SNEDDON: All right. Go ahead.

26 (Whereupon, a portion of a DVD, People's
27 Exhibit 336, was played for the Court.)

28 MR. SNEDDON: That's it. Don't go back. 546

1 Q. Okay. I just have one last final question.

2 With regard to the video footage that we've just --
3 that the ladies and gentlemen of the jury have just
4 seen, was that part of the footage from the -- when
5 you first got there, or was that from the footage
6 before you left that evening.

7 A. This was the prewarrant service footage.

8 Q. So it's the condition of the house as it was
9 when you arrived there on the morning of the 13th of
10 November of 2003.

11 A. November the 18th.

12 Q. Thank you. I just wanted to see if you were
13 still awake.

14 No further questions.

15 THE COURT: Cross-examine.

16 MR. SANGER: Thank you, Your Honor.

17

18 CROSS-EXAMINATION

19 BY MR. SANGER:

20 Q. Is it Detective or Deputy.

21 A. At the time that this was, I was a
22 detective. I have since been reassigned and it's
23 Deputy now.

24 Q. You prefer "Deputy".

25 A. That's fine.

26 Q. There you go. All right. Deputy Lafferty,
27 why don't we just pick up where we left off - that's
28 always a good place - and we'll go to some of the 547

1 other areas.
2 First of all, the video that we just saw --
3 and I'm going to go back over some of the parts
4 again. But the video that we just saw, Exhibit 336,
5 was taken on the day of the search of the ranch,
6 correct.
7 A. That's correct.
8 Q. And it was November the 18th, 2003; is that
9 correct.
10 A. That's correct.
11 Q. Now, prior to that search, you were briefed
12 along with quite a number of other officers about
13 what was going to take place; is that correct.
14 A. That's correct.
15 Q. And you received a briefing outline,
16 briefing memo of some sort; do you recall that.
17 A. Not all of us were given that. But teams
18 were assigned, and there was a packet given to each
19 team leader.
20 Q. Did you get a packet.
21 A. No, I did not.
22 Q. You were aware of the purpose of the search;
23 is that correct.
24 A. Yes.
25 Q. And you were aware that this arose out of
26 allegations by the Arvizo family; is that correct.
27 A. I do not know who the victim was.
28 Q. Do you recall that the allegations were with 548

1 regard to activities that may or may not have
2 occurred in February and March of 2003; is that
3 correct.
4 A. I don't recall.
5 Q. All right. In any event, what you have
6 shown here on the video is part of the tape that you
7 did that day, right.
8 A. That's correct.
9 Q. And the tape you did that day documents what
10 the premises looked like on November 8 -- I'm sorry,
11 November 18th, 2003, correct.
12 A. That's correct.
13 Q. And it does not document how the premises
14 looked in February or March of 2003.
15 A. That's correct.
16 Q. All right. Now, how many officers came out
17 to the Neverland Valley location.
18 A. I'm not aware of the total number.
19 Q. Was it about 45 or so.
20 A. I don't know.
21 Q. You indicated that you arrived at the ranch

22 at 9:07, and you started your video at 0955 hours;
23 is that correct.
24 A. That is correct.
25 Q. That's about the same time that Chris
26 Pappas -- what's -- what's Mr. Pappas's rank.
27 A. Sergeant.
28 Q. Sergeant. That's about the time that 549

1 Sergeant Pappas issued a press release to the press;
2 is that correct.
3 A. I don't know. I wasn't aware what time he
4 did that.
5 Q. You were aware he did that, though, is that
6 right.
7 A. At some point during the day, yes.
8 Q. And the officers -- well, you don't know how
9 many, but there were quite a number, were there not,
10 sir.
11 A. Yes, there were.
12 Q. You've been trained in the academy before
13 you became a sheriff's deputy, correct.
14 A. Yes.
15 Q. And part of your training in the academy is
16 to observe and document what you see at a scene; is
17 that correct.
18 A. Correct.
19 Q. All right. And you were not responsible for
20 counting the number of officers, I take it.
21 A. No, I was not.
22 Q. But as a trained deputy, you can tell me
23 generally how many people were out there, can't you.
24 More than, say, 30.
25 A. Yes.
26 Q. All right. And this was Mr. Jackson's home,
27 that was your understanding; is that correct.
28 A. That's correct. 550

1 Q. And it's a home that he appeared to live in;
2 is that right.
3 A. Yes.
4 Q. With his family.
5 A. It appeared so.
6 Q. And he had, at that time, and has three
7 children; is that correct.
8 A. I believe so. I don't know the total
9 number.
10 Q. When you went through the house, you saw
11 that there were bedrooms for his three children; did
12 you not.
13 A. There were three bedrooms upstairs, yes.

14 Q. And they actually had name tags on the door,
15 didn't they.
16 A. There were tags on the doors, yes.
17 Q. Okay. And each of those bedrooms for the
18 children had a key pad to keep people from coming in
19 without a combination if the door was locked; is
20 that correct.
21 A. I do recall seeing key pads on the doors.
22 Q. And Mr. Jackson's suite, the part that you
23 showed on the video there, where you go through the
24 double doors, had a key pad to restrict access; is
25 that correct.
26 A. I believe so, yes.
27 Q. Okay. Now, we'll go back over it so
28 everybody has a clearer picture, but just to do a 551

1 word picture first, when you come into the house --
2 you showed some pictures. You come into the house,
3 there's a -- what you might call a living room area;
4 is that right.
5 A. There's the foyer area where the stairs are.
6 There's a hallway leading north from where the front
7 door area is.
8 Q. And if you go north, there's an area that
9 has a castle.
10 A. That's correct.
11 Q. But it also has chairs and a television set
12 and clocks and that sort of thing; is that correct.
13 A. I don't recall any seating areas in the
14 areas with the castle.
15 Q. Okay. We'll go back and look at the
16 pictures again. But you also showed an area that
17 had sort of a blue plaid -- or a sitting area with a
18 fireplace or -- a fireplace; is that right.
19 A. Right.
20 Q. And that's sort of a family room area; is
21 that right.
22 A. Yes, that's just off of the kitchen.
23 Q. That's off that big kitchen area that you
24 showed with the copper hood and all that.
25 A. Correct.
26 Q. Next to that is a dining area; is that
27 correct --
28 A. Yes. 552

1 Q. -- with a dining table.
2 Something you didn't show on the video, if
3 you were going to the right of what I'm calling the
4 living room area, is a library; is that right. Do
5 you remember that.

6 A. Yes. If you walk through the foyer area,
7 and go to the right, there was what appeared to be a
8 library or a study area.

9 Q. So when you go into -- let me withdraw that.
10 When you're in that part of the house that we've
11 just described, that's all pretty open. In other
12 words, you can walk freely from the back door
13 through the kitchen, to the family area, the living
14 room, the study, or library, the dining area, the
15 front foyer and the front door, right.

16 A. Right.

17 Q. Correct.

18 The actual living areas for Mr. Jackson and
19 his children are accessible by using the key pads;
20 is that right.

21 A. When I was in the residence, those doors
22 were all open. But there were key pads next to the
23 doors.

24 Q. Okay. So to get to the children's room, you
25 would go upstairs, off the foyer to the right, you'd
26 go upstairs, and the children's rooms are all up in
27 that area; is that correct.

28 A. Correct. 553

1 Q. That's the same place where you saw what you
2 described as the doll room; is that correct.

3 A. Correct.

4 Q. And the area you called the toy room, we
5 might call it a craft room, but that's in the same
6 area where the children's suite is; is that correct.

7 A. That's correct.

8 Q. Okay. And, in fact, above that -- you
9 didn't show us a picture of this -- but above that
10 or in that area is a classroom. Remember the
11 classroom.

12 A. There was another -- appeared to be another
13 toy room. There were numerous toys, things in that
14 area, yes.

15 Q. And there were little desks and sort of a
16 little mini classroom, don't you -- do you recall
17 that.

18 A. There were a number of things in there. I
19 don't specifically remember desks.

20 Q. Remember there was a train set.

21 A. I do remember the train.

22 Q. In one end -- and if you go in the other
23 end, there's a more open area. There may or may not
24 have been desks there; is that what you're telling
25 us.

26 A. I don't specifically recall a desk. But --

27 Q. All right. Going back -- just doing this
28 with a word picture so the film will make a little 554

1 more sense, hopefully. When you -- if we go back to
2 the front door, and instead of going up the stairs
3 to the children's area we go to the right, there's a
4 hallway. That I think you showed on there; is that
5 correct.
6 A. Correct.
7 Q. And that's where the double doors are to
8 Mr. Jackson's private area; is that correct.
9 A. That's correct.
10 Q. And that's where he has a key pad, correct.
11 A. Yes.
12 Q. And inside of that area he has what you
13 called a sitting room, but it's like a living room
14 on the first floor; is that right.
15 A. Correct.
16 Q. There's a grand piano.
17 A. Yes.
18 Q. There are books.
19 A. Yes.
20 Q. Lots of books.
21 A. Yes.
22 Q. Okay. There's a big screen T.V..
23 A. Yes.
24 Q. Okay. And while you're in that first floor
25 area, you showed us on the video something that you
26 referred to as the bathroom; remember that.
27 A. Yes.
28 Q. And that had that Jacuzzi tub in there. 555

1 A. Yes.
2 Q. Now, if you walk through the door, and you
3 do a right face, you would be facing that big screen
4 T.V.. If you walk through the door, get in the
5 middle of the room, do a right face, you're facing
6 the big screen T.V., correct.
7 A. It would be 90 degrees to the T.V.
8 Q. Okay. Half right.
9 A. Yes.
10 Q. All right. Do a half right face. Point is,
11 on that wall with the big screen T.V., you then have
12 a door to the left.
13 A. Correct.
14 Q. And that goes into what you call the master
15 bathroom, is that correct, or you call it a
16 bathroom. Whatever you call it.
17 A. Uh-huh.
18 Q. That has a Jacuzzi.
19 A. Right.
20 Q. And that area with the Jacuzzi actually has

21 a number of books, there's writing materials,
22 there's VCRs, there's all sorts of things in there;
23 is that correct.
24 A. That's correct.
25 Q. There's a place to sit that -- perhaps when
26 the house was designed it was a vanity, but there's
27 a place to sit, which appears to also include stacks
28 of books and VCRs and things like that, correct. 556

1 A. Yes.
2 Q. The actual water closet, as they say in
3 England, but the toilet area is in a separate room
4 off to the right of that; is that correct.
5 A. That's correct.
6 Q. And there's a closet in there that has even
7 more books and other things in it; is that correct.
8 A. That's correct.
9 Q. And, in fact, right there, there's a back
10 door to go out the back of the house, is there not.
11 A. Yes, there is.
12 Q. Okay. And then if we back out of there and
13 we come back, having done that half right, we're
14 facing the big screen T.V., on the right side
15 there's another bathroom area; is that correct.
16 A. Yes, there is.
17 Q. Okay. And there's a lot of stuff stored all
18 over the place there, is that right, when you were
19 there.
20 A. Yes, there was.
21 Q. A lot of movie memorabilia.
22 A. Yes.
23 Q. And you saw, you know, original things that
24 appeared to be signed by all sorts of celebrities.
25 A. Yes.
26 Q. Walt Disney, Shirley Temple, Steven
27 Spielberg, people like that.
28 A. Yes. 557

1 Q. And as you go in that bathroom area, there
2 is an actual water closet or bathroom sink area
3 that's off of that; is that correct.
4 A. Correct.
5 Q. And then you go up those stairs, up to the
6 area where the bed is that you showed us; is that
7 correct.
8 A. Yes.
9 Q. Now, what kind of equipment were you using
10 to film this.
11 A. I was using a Sony DVCAM.
12 Q. Okay. And how do you operate that.

13 A. It's a basic camera used by a lot of the
14 media that you see outside. It's a larger format
15 camera.
16 Q. Okay. Do you put it on your shoulder.
17 A. It's a shoulder-mount-held, yes.
18 Q. And you're looking through at -- your eye
19 level is roughly the level of the lens; is that
20 correct.
21 A. That's correct.
22 Q. Okay. And how tall are you, sir.
23 A. Five-ten.
24 Q. Okay. So when you walk up the stairs,
25 you're walking up the stairs shooting at your eye
26 level for a five-ten person; is that correct.
27 A. That's correct.
28 Q. All right. 558

1 All right. Let me venture into the unknown
2 and try to work this, if I may, Your Honor. What I
3 propose to do is -- with the approval of the Court,
4 and if there's no objection from the People, I
5 propose to fast forward and just go to the
6 particular points that I want to highlight, if
7 that's all right.
8 THE COURT: I think that would be good.
9 MR. SANGER: All right.
10 (Laughter.)
11 MR. SNEDDON: I better not have any
12 objection.
13 MR. SANGER: And Mr. Sneddon's free to play
14 it all again, if he wants.
15 MR. SNEDDON: I'm not that stupid.
16 MR. SANGER: Did you turn it off. It's
17 already -- okay. Okay. I'm actually going to pause
18 here quickly.
19 Q. There's a little shot right at the
20 beginning, the first few seconds, when you put this
21 in the machine, it shows this area. And I don't
22 think you commented on this.
23 There appear to be some big video games and
24 some arcade kind of games in the picture here. I
25 stopped it at 07.
26 A. Yes, that's correct.
27 Q. Where is that located.
28 A. I have been informed that this was the 559

1 arcade room, which was a building behind the main
2 residence.
3 Q. Now, when you say you've been informed, does
4 that mean you took this.

5 A. I did not shoot this video, no.
6 Q. Were you in that building.
7 A. No, I was not.
8 Q. Do you know who shot this footage.
9 A. Yes, I do.
10 Q. Who do you believe shot this.
11 A. Detective Wittenbrock.
12 Q. Okay. Now, your official designation at the
13 time you were doing this was as a forensic deputy,
14 is that -- or what was the official title that you
15 had.
16 A. I was a detective assigned to the forensics
17 bureau.
18 Q. Forensics bureau. Now, there's what's
19 called crime scene investigators, or sometimes
20 referred to as CSI crime scene investigator. I'm
21 not talking about television. I'm talking about in
22 your department. Unlike television, in your
23 department, a CSI may not be an actual forensic
24 deputy; is that correct.
25 A. That is my job, crime scene investigation.
26 MR. SANGER: Oops. Need to get closer. I
27 didn't know what the bailiff was doing to me right
28 then. 560

1 (Laughter.)
2 MR. SANGER: I'm glad it was a friendly
3 gesture.
4 THE COURT: She wasn't going to hug you.
5 MR. SANGER: I knew she was armed. I was
6 afraid it might be something else.
7 Q. The -- okay. So at least at some point in
8 your department, they might have a sergeant go out
9 and be a CSI for a particular crime scene; is that
10 correct.
11 A. Correct.
12 Q. But you now have a forensics bureau, and the
13 forensic -- the officers, the deputies assigned to
14 the forensic bureau are supposed to be the crime
15 scene investigators, forensic experts or specialists
16 in your department; is that correct.
17 A. Correct.
18 Q. All right. And you were one of them.
19 A. Yes.
20 Q. How many forensic people did you have on
21 November 18th, 2003.
22 A. I believe there were seven of us.
23 Q. How many of them were detailed to this
24 particular case.
25 A. All of them.
26 Q. Okay. Were they all out there that day.
27 A. Yes.

28 Q. Now, we were talking about who was out 561

1 there. Besides however many police officers there
2 were, there were a number of D.A.'s investigators;
3 is that correct.

4 A. Correct.

5 Q. Those are people who work for the District
6 Attorney's Office as opposed to the sheriff or the
7 police department; is that correct.

8 A. Correct.

9 Q. In addition to that, Mr. Sneddon actually
10 came out and walked through Mr. Jackson's home; is
11 that correct.

12 A. Correct.

13 Q. And Mr. Franklin came out and did the same,
14 is that correct, Deputy D.A. Franklin.

15 A. I recall seeing him outside the residence.

16 I don't know if he walked through.

17 Q. Now, let's go through this quickly, if we
18 can.

19 So we have some footage here -- let's see,
20 I've got to point this right at it, I guess. There
21 we go.

22 We have some footage that fades out, and now
23 the rest of this film is what you shot; correct.

24 A. That's correct.

25 Q. Okay. So, we've been over it, but that's
26 the front door leading into the foyer. And in the
27 distance you can see an area that has -- well, let's
28 see, you have your pointer there. 562

1 A. Yes.

2 Q. Is there a big clock right in there; do you
3 recall.

4 A. The pillar directly in this area, yeah.

5 Q. That's a big clock right there. All right.

6 Oops. I'll point that there.

7 Now, we just saw off to the left -- this may
8 or may not work the way I'm -- there we go.

9 Okay. There's a fella standing there.

10 A. Yes.

11 Q. Is that a real person.

12 A. No, it's not.

13 Q. A mannequin.

14 A. Yes, it is.

15 Q. There are a number of mannequins all over
16 Neverland.

17 A. Yes, there are.

18 Q. Some down by the -- by the big gates, when
19 you come through the big gates --

20 A. Yes.
21 Q. -- in a little house there.
22 They're all over the house in various
23 places --
24 A. Yes.
25 Q. -- correct.
26 That one appears to be a butler and he's
27 holding a dish with cookies in it; is that right.
28 A. That's correct. 563

1 Q. Did you go into Mr. Jackson's office.
2 A. No, I did not.
3 Q. Let's see if I can fast forward here.
4 Okay. And then that's a double door to the
5 right of the door that we talked about. You go down
6 a little hallway. There are books in the bookcases
7 there; is that right.
8 A. That's correct.
9 Q. That's not the actual library we talked
10 about, though, is it.
11 A. No, it's not.
12 Q. If you go to the left through the double
13 doors that you can see in the picture there, can you
14 point that out to the --
15 A. There is a set of double doors right here,
16 which led into that library area also.
17 Q. Okay. And there's a library of books all
18 over the place in there on bookshelves, correct.
19 A. Correct.
20 Q. And if you go down this little hallway,
21 that's where the double doors are to Mr. Jackson's
22 suite --
23 A. Yes.
24 Q. -- that you described.
25 Okay. And just to the left of that -- so we
26 don't take too much time, I'll fast forward. But
27 just to the left of this is the stairway. Outside
28 the picture, there's a stairway that goes up to the 564

1 children's suite.
2 A. Yes.
3 Q. Now, this is the area here at .38, .39. See
4 the sitting area there.
5 A. Yes, I do.
6 Q. Okay. This is what I was referring to as
7 the living room. Does that make sense.
8 A. Yes.
9 Q. All right. And then this is the family
10 room. I said plaid -- there's plaid on the wall,
11 blue couches there.

12 A. Yes.
13 Q. Family room.
14 And that's -- if you turn right around and
15 did an about face from where you were just showing
16 the family room, you do an about face, you're
17 looking at the kitchen.
18 A. Yes.
19 Q. And it's open, this counter is right in
20 between the two, right.
21 A. Yes, there is.
22 Q. And when you were there, when the -- when
23 the sheriffs arrived, there were a number of
24 employees in this area; is that correct.
25 A. I was told that there were, yes.
26 Q. Okay. And so this is an open area where
27 employees are, guests might come in, that sort of
28 thing; is that your understanding. 565

1 A. I believe so, yes.
2 Q. All right. I'll fast forward again.
3 Okay. Back to the -- that's down the
4 hallway. And that's going into Mr. Jackson's area.
5 We're at 153. That's going into his first-floor
6 area.
7 And then to the right, this is -- this is
8 that right-hand area that we talked about. It
9 actually -- you got into the closet here, I guess.
10 We're looking at the screen at 203.
11 A. Yes.
12 Q. But there's the right-hand bathroom. And
13 you said if you face that big screen T.V. on the
14 right side, the half right there, the big screen
15 T.V., on the right side is the bathroom area and
16 closets, correct.
17 A. Yes.
18 Q. There's the stairway. And you're coming up
19 the stairway there with the camera up to your eye,
20 and you get up to the top there, and you look in; is
21 that correct.
22 A. That's correct.
23 MR. SNEDDON: I'm going to object to that
24 question. It's not at the top. The video speaks
25 for itself in relationship to where it is.
26 THE COURT: Overruled. Go ahead.
27 MR. SANGER: Thank you.
28 Q. We're going to fast forward here. 566

1 Now, we're back down -- this is the area
2 that you did the half right to the video screen, a
3 big screen T.V. And you go to the left and you go

4 into this area, correct.
5 A. That's correct.
6 Q. And this you described as a bathroom. It
7 does have that Jacuzzi tub at the end, correct.
8 A. Correct.
9 Q. Okay. And I'll try to fast forward. Can
10 you show us where the door to the back is.
11 A. It was behind the curtains in this area.
12 Q. If you go by that safe and you go to the
13 right, and that's the actual door; is that correct.
14 A. Yes.
15 Q. And those curtains are -- the curtains fit
16 outside to the garden, I would suspect; is that
17 right.
18 A. I believe so, yes.
19 Q. There are curtains over windows to the
20 outside. All right. And then if you go to the
21 right, there's a safe there.
22 A. Yes.
23 Q. With a picture of a little girl on the
24 thing. And if you go to the right there, that's an
25 area -- sort of a closet area, has a lot of books
26 and other things in it; is that correct.
27 A. Right here, this area, is that what you're
28 referring to. 567

1 Q. Yes.
2 A. That is the area that has the toilet in it.
3 Q. Are there two doors, or just one there.
4 A. There's two doors on that side of the room.
5 Q. And you believe that's the one that goes to
6 the toilet area.
7 A. I believe so, yes.
8 Q. Okay. Could that be the one that goes to
9 the toilet area, the one on the right.
10 A. The one on the left is the one that goes
11 into the toilet area.
12 Q. You're right. There's a toilet; how about
13 that.
14 So the other one is the one that goes into
15 the closet that has books and other memorabilia and
16 stuff.
17 A. Yes.
18 Q. Okay. And here we have the sort of living
19 room. There's a couch. There's a fireplace. To
20 the left, you can't see it, but there's a big screen
21 T.V., which we're about to see. There it is, with
22 the movie cut out in front of it. And then you go
23 back out the door.
24 All right. I'm going to stop it. And we
25 can turn it off, I think.
26 THE BAILIFF: Can you just hit "black

27 screen".

28 Q. BY MR. SANGER: Now, how long was the actual 568

1 video that you did in this -- on this location. I
2 mean, you did one video before the search. How long
3 was that video.

4 A. It was approximately an hour.

5 Q. Okay. And then you did more documentation
6 afterwards. About how long was that.

7 A. I did a total of three tapes. The
8 post-search video was approximately an hour also.

9 Q. All right. So out of the first hour, you
10 selected so many minutes that we just saw there; is
11 that right.

12 A. Yes.

13 Q. All right. Now, you did take some still
14 photos, you said, of various items. Did you take
15 any still photos in one of the bathroom areas, which
16 you've described as the bathroom.

17 A. Yes.

18 Q. Did you take photos of a briefcase.

19 A. Yes, I did.

20 Q. All right. Now, at some point, as the
21 forensic investigator in this case, did you take
22 charge of the materials that were inside of that
23 briefcase.

24 A. The initial collection was done by the
25 detectives who were conducting the search. It was
26 later turned over to us, which was secured in our
27 lab.

28 Q. All right. What -- do you know the 569

1 sheriff's number for the materials that were inside
2 that briefcase.

3 A. No, I do not.

4 Q. Does 317 ring a bell.

5 A. I don't know.

6 Q. Okay. Did you bring your reports with you.

7 A. Yes, I did.

8 Q. Can you tell by looking at your various
9 reports what the number of those items was.

10 A. I do not show -- I'm sorry.

11 I do have one report that refers to No. 317.

12 Q. Okay. So the contents of the briefcase were
13 Sheriff's Item 317; is that correct.

14 A. I was not involved with the assignment of
15 the number. I don't know what number it was
16 assigned at the time.

17 Q. Let's talk about numbers just for a second.

18 We have exhibit numbers in court here that are

19 assigned by the clerk. There may be reference to
20 exhibit numbers from another proceeding; for
21 instance, the grand jury.
22 But when the sheriff -- when your department
23 seizes evidence, you mark down a number on an
24 inventory sheet, and then you put that number on a
25 tag, and you put that on the actual item that's
26 seized; is that correct.
27 A. That's correct.
28 Q. So you can keep track -- no matter what 570

1 numbers the Court gives, or, say, the grand jury
2 gives something, there's also the sheriff's number.
3 And we can go back to that, and you can say that's
4 the item, because it was given that number; is that
5 correct.

6 A. Yes.

7 Q. All right. Now, do you remember checking
8 the contents of the briefcase out of the sheriff's
9 lockup; in other words, sheriff's evidence lockup to
10 take to the lab.

11 MR. SNEDDON: Your Honor, I'm going to
12 object, because there were several briefcases taken.
13 And I'm -- it's unclear as to which one he's talking
14 about. He has no personal knowledge as to what the
15 itemization of the number was, so lack of foundation
16 would be the short way of putting it.

17 THE COURT: Foundation; sustained.

18 MR. SANGER: Okay.

19 Q. All right. And you can't tell -- you can't
20 tell us from your reports what items you took out of
21 the sheriff's lockup to do testing on.

22 A. Yes, I can.

23 Q. Do you want to tell us what numbers those
24 were.

25 A. The original ones which I was assigned to
26 begin with was 304, 306, 307, 309, and 313.

27 Q. Did you eventually take 317.

28 A. The only involvement that I had with that 571

1 initially was I picked up Item 317 from the
2 Department of Justice Lab and took it back for photo
3 documentation at our lab.

4 Q. All right. And what date was that.

5 A. That was on 5-20-04.

6 Q. Do you recall on January 30th assisting
7 Deputy Herman. Is that Lisa Herman.

8 A. Hemman.

9 Q. Sorry. Hemman. Do you recall assisting
10 Deputy Hemman in going through various evidence

11 items.
12 A. Yes, I do.
13 Q. And among those evidence items was 317, one
14 of those items.
15 A. It may have been. I don't recall the
16 specific number.
17 Q. And when you were working with Deputy
18 Hemman -- when you were assisting Deputy Hemman,
19 what were you doing. Were you doing fingerprints.
20 A. That was an alternate light source search.
21 Q. So you weren't looking for fingerprints.
22 A. No.
23 Q. You were looking at the items to see if
24 there was some other substance, fluid, blood, semen,
25 something on them; is that right.
26 A. Correct.
27 Q. And you didn't find anything on 317.
28 A. I don't know. 572

1 Q. All right. Okay.
2 Can I have -- and I suppose the clerk has
3 them now -- the exhibits that this witness referred
4 to. And I think it was 4 or 5 through about 12.
5 The photographs. Okay. Thank you.
6 Now, venturing into yet another area, with
7 the Court's permission, I'm going to try to use the
8 overhead projector. And let's see here. I think we
9 hit that button.
10 THE BAILIFF: And you hit the "black screen"
11 button. And is it on.
12 MR. SANGER: Yes, it is. How about that.
13 Q. I want to direct your attention -- okay. If
14 you put the lights on it there's a little more
15 light, but then there's glare.
16 If you look at Exhibit 8, which has been
17 received in evidence - and I put it up on the
18 overhead camera - that's one of the pictures you
19 told us that you had taken, and then you put the
20 labeling on to show what the various parts of the
21 ranch were, correct.
22 A. That's correct.
23 Q. And with your laser there, if you could,
24 show us where the lake is. I think we can see it.
25 But just to orient, because it's a little dark.
26 A. The dark area, beginning in the center of
27 the photograph, extending up and to the left,
28 around. That area there. 573

1 Q. Okay. And right there where it says
2 "Guesthouse," those are the guest units on the

3 property; is that correct.
4 A. Yes.
5 Q. And they're right on the lake; is that
6 right.
7 A. That's correct.
8 Q. Did you determine what the numbers of the
9 guest units were. 1, 2, 3, 4.
10 A. No, I do not.
11 Q. There are four, though, four units in that
12 area, correct.
13 A. I'm not aware of how many there are.
14 Q. In any event, there's a guesthouse that
15 appears to have more than one unit. Would you grant
16 me that.
17 A. Yes.
18 Q. There you go.
19 And then the main house is depicted. You
20 can see the main house from the guesthouse, correct.
21 A. Yes.
22 Q. And, in fact, you just walk -- how far is
23 the main house from the guesthouse.
24 A. 75 yards.
25 Q. Oh. Now, see the train station there.
26 A. Yes.
27 Q. And the train station is actually up on a
28 hill; is that right. 574

1 A. Yes.
2 Q. And there's a road that leads -- in the
3 picture that's going up, but actually goes downhill
4 towards the main house and the guesthouse; is that
5 correct.
6 A. Yes.
7 Q. Can you show the jury where that is, please.
8 A. This is the building of the train station
9 here. And this is the road that leads up past the
10 main house.
11 Q. So the main house is on the left and the
12 guesthouse is on the right.
13 A. Correct.
14 Q. And there's a clock that -- a large
15 decorative clock that is located right in front of
16 that train station; is that correct.
17 A. Yes.
18 Q. And I'm going to put up No. 12, which has
19 been received into evidence.
20 No. 12 is an aerial shot of that clock; is
21 that correct.
22 A. Yes, it is.
23 Q. And of course, from the air, everything
24 looks flat on the ground. You don't really see the
25 contours of the hills and so on; is that right.

26 A. Correct.
27 Q. And, in fact, the clock itself is created on
28 about a 45-degree angle; was it not. 575

1 A. I was not in that area, so I couldn't say.

2 Q. So you took the picture from up above.

3 A. Yes.

4 Q. And how high were you. What was your
5 elevation when you took that picture.

6 A. We were about 1200 to 1500 feet.

7 Q. Okay. So this clock would be visible from
8 thousands of feet in the area; is that right.

9 A. Yes.

10 Q. And it tells time. It's a working clock,
11 correct.

12 A. I do not know that.

13 Q. When you -- when you were on the ground
14 there, you didn't look over and see that clock.

15 A. I did see the clock.

16 Q. So when you're on the ground, by the house
17 and the guest units, you could look over and see
18 that clock, correct.

19 A. Yes.

20 Q. All right. And when I said "45-degree
21 angle," I'm not trying to quibble. I don't know. I
22 didn't measure. Okay. But it's not on the ground
23 flat, facing into space.

24 A. Correct. It is at an angle.

25 Q. It's at an angle so you can see it from the
26 property.

27 A. Yes.

28 Q. Did you notice that there were a number of 576

1 other clocks that were positioned in various place
2 on this property.

3 A. The only area that I was on the property was
4 at the main residence.

5 MR. SANGER: Okay. Let me just have one
6 moment, Your Honor, please.

7 I have no further questions. Thank you.

8 MR. SNEDDON: No questions, Your Honor.

9 Your Honor, I --

10 THE COURT: You may step down, Officer.

11 Thank you.

12 MR. SNEDDON: I have the next witness ready.

13 It's five minutes to break time. Do you want to
14 take the break five minutes early before we start
15 that witness.

16 THE COURT: No, we can start the witness.

17 MR. SNEDDON: It will take two minutes to

18 get her here.
19 MR. SANGER: Let me use ten seconds of the
20 two minutes, Your Honor.
21 THE COURT: Well, the witness is on its way.
22 You can go ahead.
23 MR. SANGER: I was just going to say before
24 Deputy Lafferty leaves, that we would like him to
25 remain on re-call. And I think we will have to call
26 him back when we have other officers to testify to
27 the chain of custody on the items we're talking
28 about. 577

1 THE COURT: All right. Officer, you'll
2 remain on call, please.
3 MR. SANGER: Thank you, Your Honor.
4 MR. SNEDDON: Judge, I'm sorry. My
5 understanding was that the witness was right behind
6 your door, right off your room in the anteroom
7 there, and it would take less than 20 seconds to get
8 here. It's one of the children in this case. I
9 apologize, but that was my understanding. It's
10 not -- she's not up in my office.
11 Jill. Right off your room in the anteroom
12 there, and it would take
13 THE COURT: Come forward to the witness
14 stand, please. Remain standing. Face the clerk,
15 over here, raise your right hand.
16
17 DAVELLIN ARVIZO
18 Having been sworn, testified as follows:
19
20 THE WITNESS: Yes.
21 THE CLERK: Please be seated. State and
22 spell your name for the record.
23 THE WITNESS: My name is Davellin Arvizo.
24 D-a-v-e-l-l-i-n, A-r-v-i-z-o.
25 THE BAILIFF: You're going to have to scoot
26 real close.
27 //
28 // 578

1 DIRECT EXAMINATION
2 BY MR. SNEDDON:
3 Q. Good morning.
4 A. Good morning.
5 Q. You're going to lean right into that and
6 talk to it so everybody can hear what you have to
7 say. Okay.
8 A. Okay.
9 Q. Miss Arvizo, how old are you.

10 A. I'm 18 years old.
11 Q. And you currently go to school; without
12 giving me the name of the school, but a school.
13 A. Yes.
14 Q. And what level are you in the school.
15 A. I'm a freshman in college.
16 Q. And do you have a full-time job.
17 A. Yes, I work full time.
18 THE COURT: Just a moment. Just a moment.
19 Mr. Sneddon, they can't hear. It is time for the
20 break. Maybe you could work with her on the mike
21 for a moment after we take our break. We'll take
22 our break.
23 (Recess taken.)
24 --o0o--
25
26
27
28 579

1 REPORTER'S CERTIFICATE

2

3

4 THE PEOPLE OF THE STATE)

5 OF CALIFORNIA,)

6 Plaintiff,)

7 -vs-) No. 1133603

8 MICHAEL JOE JACKSON,)

9 Defendant.)

10

11

12 I, MICHELE MATTSON McNEIL, RPR, CRR,

13 CSR #3304, Official Court Reporter, do hereby

14 certify:

15 That the foregoing pages 529 through 579

16 contain a true and correct transcript of the

17 proceedings had in the within and above-entitled

18 matter as by me taken down in shorthand writing at

19 said proceedings on March 3, 2005, and thereafter

20 reduced to typewriting by computer-aided

21 transcription under my direction.

22 DATED: Santa Maria, California,

23 March 3, 2005.

24

25

26

27 MICHELE MATTSON McNEIL, RPR, CRR, CSR #3304

28 580

1 SUPERIOR COURT OF THE STATE OF CALIFORNIA

2 IN AND FOR THE COUNTY OF SANTA BARBARA
3 SANTA MARIA BRANCH; COOK STREET DIVISION
4 DEPARTMENT SM-2 HON. RODNEY S. MELVILLE, JUDGE

5
6

7 THE PEOPLE OF THE STATE OF)
8 CALIFORNIA,)
9 Plaintiff,)
10 -vs-) No. 1133603
11 MICHAEL JOE JACKSON,)
12 Defendant.)

13
14
15
16

17 REPORTER'S TRANSCRIPT OF PROCEEDINGS

18

19 THURSDAY, MARCH 3, 2005

20

21 8:30 A.M.

22

23 (PAGES 581 THROUGH 766)

24

25

26

27 REPORTED MICHELE MATTSON McNEIL, RPR, CRR, CSR #3304

28 BY: Official Court Reporter 581

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22

23

24

25
26
27
28 582

1 E X H I B I T S
2 FOR IN
3 PLAINTIFF'S NO. DESCRIPTION I.D. EVID.
4
5 13 Photo of Fritz, Davellin, Star 588 588 and Gavin
6 14 Photo of Davellin, Star, Gavin
7 and Chris 605 606
8 17 Photo of Dieter Weizner 648 648
9 18 Photo of Ronald Konitzer 648 648
10 19 Photo of Vincent Amen aka Vinnie 712 714 Black
11 20 Photo of Frank Cascio aka Frank
12 Tyson 647 648
13 21 Photo of Aldo Cascio 647 648
14 22 Photo of Marie Nicole Cascio 647 648
15 23 Photo of Brad Miller 712 714
16 28 Photo of Jamie Masada 586 587
17 29 Photo of Hamid Moslehi 720 720
18 30 Photo of Jesus Salazar Salas 712 714
19 31 Photo of Janet Arvizo 617 618
20 35 Photo of David Gavino Arvizo 617 618
21 43 Photo of Grace Rwaramba 646 648
22 48 Photo of Jay Jackson 646 648
23 49 Photo of Davellin, Gavin, Star and Louise 605 606
24 125 Photo of Calabasas Country Inn and 713 714
25 Suites
26 135 Photo of kitchen of Calabasas Inn, 713 714 Room 200
27 138 Photo of Room 200 looking toward 713 714
28 entrance and hallway 583

1 E X H I B I T S
2 FOR IN
3 PLAINTIFF'S NO. DESCRIPTION I.D. EVID.
4
5 194 Photo of View of living room of 713 714 Hamid Moslehi's residence
6
7 199 Photo of Star, Gavin and Kobe Bryant 605 606
8 337 Photo of Gavin and Star 606 606
9 338 Photo of Davellin, Gavin and Star 618 618
10 339 Photo of interior of the private jet from Miami 669 670
11
12
13
14
15
16

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18
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28 584

1 MR. SNEDDON: Your Honor, just to forewarn
2 the Court, we may be wanting you to go to Input 1,
3 to hook up the computer to --
4 THE COURT: I'll be ready.
5 MR. SNEDDON: I hope so.
6 Q. So how we doing on the mike.
7 A. Fine.
8 Q. Lean into it.
9 A. Sorry.
10 Q. All right. Talk loud. Okay.
11 Now, you're a full-time student at a college
12 as a freshman, correct.
13 A. Yes.
14 Q. And you have a job.
15 A. Yes. I work full time.
16 Q. Now, let's go back in time a little bit.
17 A. Okay.
18 Q. All right. And let's go back to the year of
19 1999.
20 A. Okay.
21 Q. Okay. Where did you go to school then.
22 A. It was either eighth grade or the beginning
23 of freshman year in coll -- no, high school.
24 Q. And let's talk about the eighth grade in
25 1999. All right. Where did you go to the eighth
26 grade; what school.
27 A. Hollywood Middle School.
28 Q. Then you went to high school as a freshman 585

1 in the same year, '99.
2 A. Uh-huh.
3 Q. You have to say "Yes" or "No."
4 A. Yes.
5 Q. And what high school did you go to.
6 A. I went to Hollywood High School.
7 Q. Where were you living at this time.
8 A. In East L.A.

9 Q. How is it that you ended up at Hollywood High
10 School when you lived in East Los Angeles.
11 A. The school bus would come pick me up because
12 I was a magnet student.
13 Q. Could you explain to the ladies and
14 gentlemen of the jury what a magnet student means.
15 A. You have to have good grades. And they
16 have, like, special extracurricular activities.
17 Q. And what particular extracurricular
18 activities were you involved in.
19 A. Performing arts.
20 Q. And were you doing that as like a -- what
21 aspect of that.
22 A. Like fixing the stage and stuff like that.
23 Q. So you were the technical person, huh.
24 A. Yeah.
25 Q. You weren't the performer.
26 A. No.
27 Q. Now, how long were you at Hollywood High.
28 A. For about two years. 586

1 Q. So it would be through your freshman and
2 sophomore years.
3 A. Yes.
4 Q. Now, during the time that you were at
5 Hollywood High, during your time that you were
6 there, where were you living. Specifically, what
7 address.
8 A. Um, it was on Soto Street. It was a
9 bachelor's apartment.
10 Q. Could you describe to the ladies and
11 gentlemen of the jury what the size of the interior
12 of this apartment was.
13 A. About from here to that other wall. It
14 wasn't very big at all.
15 Q. "From here," do you mean from the railing of
16 the jury box.
17 A. Yeah.
18 Q. To the far wall of the courtroom.
19 A. No, the end of that wall.
20 Q. Where the sign says "Lorna Frey".
21 A. Uh-huh.
22 MR. SNEDDON: I wanted to get you on the
23 record.
24 (Laughter.)
25 Q. BY MR. SNEDDON: Now, how many people were
26 living in this apartment or --
27 A. At the beginning, five.
28 Q. Five. And who would that be. 587

1 A. My father, my mother, and me and my
2 brothers.
3 Q. All right. Let's go back. Your father's
4 name is.
5 A. David.
6 Q. And his last name.
7 A. Arvizo.
8 Q. And your mother's first name.
9 A. Janet.
10 Q. And your brother's first name.
11 A. Gavin.
12 Q. Is Gavin younger or older than you.
13 A. He's younger.
14 Q. And do you have another brother.
15 A. Yes.
16 Q. And that brother's name.
17 A. Star.
18 Q. And is he younger or older than Gavin.
19 A. He's younger.
20 Q. And you now have another brother; is that
21 correct.
22 A. Yes.
23 Q. And his name is.
24 A. Jett.
25 Q. And how old is Jett.
26 A. He's seven months.
27 Q. So at that time, there were the five of you
28 living in this apartment. 588

1 A. Uh-huh. Yes.
2 Q. Now, during the -- sometime in 2000, did
3 something happen with regard to one or more of your
4 brothers.
5 A. Yes. Gavin was diagnosed with cancer.
6 Q. Do you remember approximately when that was.
7 A. Before I was a freshman in high school.
8 During the summer of eighth grade.
9 Q. Now, what happened when Gavin was diagnosed
10 with cancer. Where did -- did they have to take him
11 somewhere for treatment or --
12 A. Yeah, he would go to Kaiser Hospital.
13 Q. Did you ever go with him to the hospital.
14 A. I would visit him once in a while. As much
15 as I could. Because I was in school at that time,
16 too.
17 Q. At some point -- at this time, the family
18 unit, your father, your mother and your brothers,
19 are still living with you; is that correct.
20 A. Yes.
21 Q. All together.
22 A. Yes.
23 Q. Now, when Gavin was in the hospital -

24 okay. - to your knowledge, did Gavin know at that
25 time a person by the name of Jamie Masada.
26 A. Yes. We already knew him before then.
27 Q. All right. Now, could you tell the ladies
28 and gentlemen of the jury how you knew Jamie Masada. 589

1 A. In the summer of 1999 we were in a comedy
2 camp.
3 Q. Okay.
4 A. At his club.
5 Q. Do you know the name of the club.
6 A. The Laugh Factory.
7 Q. And you say "we" were, who was in the camp.
8 A. Me and my brothers.
9 Q. And you met Mr. Masada at that time.
10 A. Yes.
11 Q. Did you meet any other people, comedians, at
12 that time.
13 A. Yeah. Every time we had a meeting, a new
14 star would come and just teach us little techniques
15 and stuff.
16 Q. And who were some of the people that came to
17 that camp.
18 A. Fritz. Paul Rodriguez. One of the -- Shawn
19 Wayans went. George Lopez. That's all I can
20 remember right now.
21 Q. Okay. I'm going to show you a photograph.
22 MR. MESEREAU: May I see what that is.
23 MR. SNEDDON: I'll bring it over.
24 MR. MESEREAU: Okay. Thank you.
25 MR. SNEDDON: Your Honor, I have a
26 photograph that's been premarked as No. 28 for
27 identification purposes.
28 Q. Miss Arvizo, do you recognize the person 590

1 depicted in that photograph.
2 A. Yes.
3 Q. And who is that.
4 A. Jamie Masada.
5 Q. Is that an accurate representation of Mr.
6 Masada.
7 A. Yes.
8 MR. SNEDDON: Move it be admitted, Your
9 Honor.
10 MR. MESEREAU: No objection.
11 THE COURT: It's admitted.
12 MR. SNEDDON: Display that for the jury, if
13 you could.
14 THE COURT: Just show the jury.
15 MR. SNEDDON: No, we're going to do it up

16 here.
17 Q. Can you see that, Miss Arvizo.
18 A. Yes.
19 Q. Is that Jamie Masada.
20 A. Yes.
21 Q. And this is the person from The Laugh
22 Factory.
23 A. Yes.
24 Q. Okay. Did I hear you say something about
25 somebody named Fritz.
26 A. Yes.
27 Q. Who is that.
28 A. He's the weather guy from Channel 4. 591

1 Q. You met him at this camp.
2 A. Yes, he did host in one of the little
3 classes.
4 MR. SNEDDON: Your Honor, I have an exhibit
5 marked as People's 13 for identification purposes.
6 And I'm showing it to counsel.
7 MR. MESEREAU: Okay.
8 Q. BY MR. SNEDDON: I'm going to hand you
9 People's 13 for identification. Go ahead, you can
10 grab it. I'm sorry, excuse my bad manners.
11 A. That's okay.
12 Q. Now, with regard to that particular
13 photograph, do you recognize the individuals in that
14 photograph.
15 A. Yes.
16 Q. And is that an accurate depiction of the
17 people in that photograph.
18 A. Like accurate how.
19 Q. Is that the way you looked.
20 A. Looked back then.
21 Q. Back then. That's the way Mr. Coleman
22 looked.
23 A. Yes.
24 MR. SNEDDON: All right. Move that be
25 admitted, Your Honor.
26 MR. MESEREAU: No objection, Your Honor.
27 THE COURT: It's admitted.
28 Q. BY MR. SNEDDON: Now, the person on the far 592

1 left of the photograph, who's that.
2 A. That's me.
3 Q. How old were you when this was taken.
4 A. About 13.
5 Q. And the person just below you with your
6 hands on their shoulder.
7 A. That's Star.

8 Q. And that's your brother.
9 A. Uh-huh, yes.
10 Q. And do you recognize the person in the
11 middle.
12 A. Yes.
13 Q. Who's that.
14 A. Fritz.
15 Q. And the person with his arm on Fritz's
16 shoulder, who's that.
17 A. That's Gavin.
18 Q. Okay. And do you recall when this was
19 taken.
20 A. Yeah. That was during the comedy camp.
21 MR. SNEDDON: All right. Go ahead and put
22 the lights back on, Your Honor.
23 Q. Now, you told the ladies and gentlemen that
24 your brother was sick, that he had been diagnosed
25 with cancer.
26 A. Uh-huh.
27 Q. Now, did -- to your knowledge, did you know
28 about any of his wishes to meet certain people while 593

1 he was in the hospital.
2 A. Yes.
3 Q. And do you recall the names of any of the
4 people that he wanted to meet.
5 A. Yes.
6 Q. Who were they.
7 A. He gave a list to Jamie Masada. It was
8 Chris Tucker, Adam Sandler, and Mr. Jackson.
9 Q. To your knowledge, did he meet those people.
10 A. He met two of them, yes.
11 Q. Which two.
12 A. Mr. Jackson and Chris Tucker.
13 Q. And were you -- have you ever been with Mr.
14 Tucker.
15 A. Yes.
16 Q. On how many occasions.
17 A. Lots of occasions.
18 Q. Did he kind of become a friend of the
19 family.
20 A. Yes.
21 Q. Now, with regard to your brother and Mr.
22 Jackson, do you know of your own personal knowledge
23 whether there were any contacts -- when the first
24 contacts between your brother and Mr. Jackson
25 occurred.
26 A. It was on a telephone call. He called
27 Kaiser.
28 MR. MESEREAU: Objection. Foundation; 594

1 hearsay.
2 THE COURT: Sustained.
3 Q. BY MR. SNEDDON: Were you present when that
4 conversation occurred.
5 A. No, I wasn't.
6 Q. So you heard about it from somebody else.
7 A. Gavin had told me when I got there later on.
8 MR. MESEREAU: Objection; hearsay.
9 THE COURT: Sustained.
10 MR. MESEREAU: Move to strike.
11 THE COURT: Stricken.
12 Q. BY MR. SNEDDON: Were you ever present at
13 your grandparents' house when Mr. Jackson called.
14 A. Yes.
15 Q. And were you present during the
16 conversation.
17 A. No.
18 Q. But you were at the house.
19 A. Yes.
20 Q. Was there a point in time when you and your
21 family went to Neverland Valley Ranch.
22 A. Yes.
23 Q. And do you remember approximately when that
24 was.
25 A. It was at the beginning of Gavin's cancer,
26 so around 2000.
27 Q. Were you in school at that time.
28 A. Yes. I think so. I don't remember. I had 595

1 either -- I had to be in school, yeah.
2 Q. Do you remember who all went to the ranch.
3 A. It was me, my father, and my brothers and my
4 mom.
5 Q. And do you recall how you got to the ranch.
6 A. A limo came and picked us up.
7 Q. And where did they pick you up.
8 A. At the Soto apartment.
9 Q. Do you remember what day of the week it was
10 that they picked you up.
11 A. No.
12 Q. Now, when you got to the ranch, could you
13 tell the ladies and gentlemen of the jury, as the
14 limousine got onto the ranch and up to the main
15 residence, what happened.
16 A. We were greeted by the cooks. And then we
17 were brought into like the dining room area, like
18 it's right in front of the kitchen area, and then
19 Mr. Jackson came and greeted us.
20 Q. Did you spend the night.
21 A. Yes, we did.
22 Q. Where did you spend the night.

23 A. In one of the guest rooms.
24 Q. And do you know where your brothers spent
25 the night.
26 MR. MESEREAU: Objection; foundation.
27 THE COURT: Sustained. Actually, I'll allow
28 her to answer that "Yes" or "No" as part of the 596

1 foundation.
2 MR. SNEDDON: Thank you.
3 Q. Do you know -- do you know where your
4 brothers stayed.
5 A. Yes.
6 Q. At least the first night.
7 A. Yes.
8 Q. Okay. Were you ever in their room.
9 A. With them. No.
10 Q. Did you go -- not did you sleep there, but
11 did you ever go into their room.
12 A. No.
13 Q. Did -- were your parents -- do you know
14 where your parents stayed that night.
15 A. Yes.
16 Q. Did you go into your parents' room.
17 A. Yes.
18 Q. And where did your parents stay that night.
19 A. They stayed in another guest room.
20 Q. And where was that guest room in
21 relationship to where you stayed.
22 A. Right next to mine. Well, kind of towards
23 the back area, facing the lake.
24 Q. Facing the lake.
25 A. Uh-huh.
26 Q. And you were in the front of that.
27 A. Yeah.
28 Q. During the time that you were at Neverland, 597

1 when you first got there, after you were greeted by
2 Mr. Jackson -- by the way, do you recognize Mr.
3 Jackson.
4 A. Yes.
5 MR. SNEDDON: Can the record so indicate
6 that, Your Honor.
7 THE COURT: Yes.
8 Q. BY MR. SNEDDON: When you were greeted by
9 Mr. Jackson, after that, what did you do. What did
10 you do.
11 A. Just went out and went to the arcade and
12 drove around the little carts.
13 Q. Did you do that by yourself.
14 A. Yeah.

15 Q. Was there anybody else with you.
16 A. Well, during that visit, me and my parents
17 would go out and -- occasionally, but I was mainly
18 by myself.
19 Q. And where did you drive in the carts.
20 A. Towards the movie theater and to the zoo and
21 stuff.
22 Q. You're going to have to lean into it.
23 A. Towards the movie theater and the zoo.
24 Q. So you just took a tour.
25 A. Uh-huh.
26 Q. Now, during the time that you were there,
27 was there ever an incident that occurred between
28 your mother and your father. 598

1 A. Yes.
2 Q. Were you present.
3 A. Yes.
4 Q. Who else was present.
5 A. Star was.
6 Q. Tell us what happened. And let me ask you
7 this: Let's go back just a second, if we can. Do
8 you remember about what time it was when you arrived
9 at Mr. Jackson's Neverland Valley Ranch on the first
10 occasion when you arrived there.
11 A. It was daytime. I don't know when.
12 Q. Do you remember what time it was in
13 relationship to dinner.
14 A. Oh, it was far from dinner.
15 Q. So it was in the afternoon hours.
16 A. Uh-huh.
17 Q. Did you go to school that day; do you
18 recall.
19 A. I don't think so.
20 Q. So that -- the incident that I'm about to
21 ask you to describe, did that occur on that day or
22 another day.
23 A. I think it was another day.
24 Q. Do you recall when it was in relationship to
25 when you first got there. Like was it the next day,
26 or the next day, or what.
27 A. Probably the next or a couple days after.
28 Q. What happened. 599

1 MR. MESEREAU: Objection. Hearsay; and
2 vague.
3 MR. SNEDDON: Judge, I already laid the
4 foundation that she was there and she was in the
5 room.
6 THE COURT: The objection is overruled.

7 Q. BY MR. SNEDDON: What happened.
8 A. My parents were arguing back and forth, and
9 my dad threw a soda can at my mom.
10 Q. And what happened after he threw the can at
11 her.
12 A. He ran, like walked -- stormed out of the
13 room.
14 Q. And what was your mother's reaction.
15 A. She just started crying.
16 MR. MESEREAU: Objection; hearsay.
17 THE COURT: Overruled. The answer is, "She
18 started crying."
19 Q. BY MR. SNEDDON: Now, during the time that
20 you were living with your father and your mother and
21 your brothers at the Soto Street residence, did you
22 ever see your father strike your mother.
23 A. Yes.
24 Q. On how many occasions.
25 A. Too many to count. So many.
26 Q. Did he ever strike you.
27 A. Yes.
28 Q. How about your brothers. 600

1 A. Yes.
2 Q. On how many occasions.
3 A. Lots.
4 Q. Has your mother ever struck you.
5 A. Never.
6 Q. Now, when you were at the ranch -- go back
7 to the ranch for just a second. You were at the
8 ranch, and you're visiting. Do you know -- were you
9 present during a conversation, at any time while you
10 were on the ranch, concerning whether or not the
11 boys would stay with Mr. Jackson in his bedroom.
12 MR. MESEREAU: Objection. Hearsay;
13 foundation.
14 MR. SNEDDON: I haven't asked for the --
15 THE COURT: All right.
16 You may answer that "Yes" or "No."
17 The objection is overruled.
18 THE WITNESS: What was the question again.
19 THE COURT: I'll have the court reporter read
20 it to you.
21 MR. MESEREAU: And leading, Your Honor.
22 THE COURT: Overruled.
23 (Record read.)
24 THE WITNESS: Yes.
25 Q. BY MR. SNEDDON: And where did that
26 conversation take place.
27 A. In the main dining room.
28 Q. And who was present when the conversation 601

1 took place.
2 A. Me, my father, my brothers and Mr. Jackson.
3 Q. And what was going on at the time that it
4 took place.
5 A. We were eating.
6 Q. Who brought up the subject.
7 A. Gavin did.
8 MR. MESEREAU: Objection; hearsay.
9 THE COURT: Overruled.
10 Q. BY MR. SNEDDON: I'm sorry, I don't think we
11 heard your answer. Who brought it up.
12 A. Gavin.
13 Q. Gavin did.
14 A. Uh-huh.
15 Q. In response to his request --
16 MR. MESEREAU: Objection. Misstates the
17 evidence; leading; hearsay.
18 MR. SNEDDON: I haven't even finished the
19 question yet.
20 THE COURT: But I think you caught yourself.
21 MR. SNEDDON: No, I --
22 THE COURT: I'll sustain the objection as
23 leading. It's --
24 Q. BY MR. SNEDDON: As a result of the
25 conversation that particular night, do you know, of
26 your own personal knowledge, where your brother
27 slept.
28 A. Yes. 602

1 Q. Where.
2 MR. MESEREAU: Objection. Foundation;
3 hearsay; relevance.
4 THE COURT: Foundation; sustained.
5 Q. BY MR. SNEDDON: With regard to your -- I
6 asked you of your own personal knowledge.
7 A. Yes.
8 Q. And what was that based on.
9 A. Gavin telling me -- well, no --
10 MR. MESEREAU: Objection. Hearsay; move to
11 strike.
12 MR. SNEDDON: I'll rephrase it this way,
13 Judge:
14 Q. As a result of the conversation that --
15 without telling us what was said, as a result of the
16 conversation that occurred at the dinner table, did
17 your brothers sleep in the guest room that night.
18 A. No.
19 Q. Now, after this visit to Neverland Valley
20 Ranch that you've described to the ladies and
21 gentlemen of the jury, to your knowledge, only based

22 on your knowledge, when was the next time that you
23 went back to the ranch.
24 A. Not for a while. It was -- the next time I
25 went was with Chris.
26 Q. Chris who.
27 A. Tucker.
28 Q. Now, let me see if I can put that in 603

1 relationship to something.
2 Do you remember a time -- can you tell us
3 whether or not you ever visited the ranch in
4 conjunction with a filming.
5 A. Yes.
6 Q. Now, was the time that you went to the ranch
7 with Mr. Tucker before or after that.
8 A. Before.
9 Q. And do you recall approximately how long
10 before that.
11 A. A while. Months.
12 Q. A couple of months. It's the same year, or
13 a different year.
14 A. Pretty close, I think.
15 Q. How many different times did you go to the
16 ranch with Mr. Tucker.
17 A. Two.
18 Q. Was the defendant, Mr. Jackson, present
19 during the times you went to the ranch.
20 A. No.
21 Q. Was he present during the time that you went
22 there for the Bashir filming.
23 A. Yes.
24 MR. MESEREAU: Objection; foundation.
25 THE COURT: Overruled.
26 Q. BY MR. SNEDDON: Now, the time that you went
27 to the ranch with your mother and your father and
28 your brothers, that was the first time you went, 604

1 correct.
2 A. Yes.
3 Q. The one you described to the jury.
4 A. Yes.
5 Q. The times that you went to the ranch with
6 Mr. Tucker that you've described --
7 A. Yes.
8 Q. -- can you tell the jury whether or not
9 your mother went with you on those occasions.
10 A. She didn't.
11 Q. On the occasion of when you went there for
12 the Bashir filming, was your mother with you.
13 A. No.

14 Q. Between the time that you went to the ranch
15 on the very first time that you've described to the
16 ladies and gentlemen of the jury, the incident
17 involving your mother and father, let's put it that
18 way, until the time you went back with Chris Tucker,
19 do you know, of your own personal knowledge, whether
20 your brother and your father went back to the ranch.
21 A. Yes.
22 Q. Do you know how many times.
23 MR. MESEREAU: Objection; foundation.
24 THE COURT: Overruled.
25 You may answer.
26 THE WITNESS: Quite a bit of times. I don't
27 know exactly how many times.
28 Q. BY MR. SNEDDON: Did your mother, to your 605

1 knowledge, ever go with them.
2 A. No.
3 Q. Now, during the time that your brother Gavin
4 was hospitalized with cancer -- okay. We're going
5 to start talking about that now.
6 A. Okay.
7 Q. Did you ever attend -- to your knowledge,
8 were there ever efforts to raise money to help the
9 family offset some of the expenses for the --
10 A. The only one I know about was a benefit at
11 The Laugh Factory.
12 Q. Okay. And did you go to that.
13 A. Yes, I did.
14 Q. And who else went to it from your family.
15 A. My father, my two brothers.
16 Q. Did your mother go.
17 A. No.
18 Q. And do you know who was sponsoring the
19 benefit.
20 A. Jamie Masada or Chris. It was like a
21 graduation of other com -- like little kids, like we
22 did.
23 Q. So that was a graduation ceremony.
24 A. Yeah.
25 Q. And you said Mr. Masada. I heard you say
26 Chris. Chris who.
27 A. Chris Tucker. He was there also. But I
28 don't know whether he was sponsoring it or not. 606

1 Q. And you were present at that particular
2 benefit.
3 A. Yes.
4 Q. During the time that your brother was
5 undergoing his treatments for cancer, was it

6 required for the family to make some adjustments in
7 the living conditions for your brother.

8 A. Yes.

9 Q. And where was he living during that time.

10 A. He was living with my grandmother.

11 Q. And could you tell the ladies and gentlemen
12 of the jury what adjustments had to be made.

13 A. They had -- they had to be very, very clean;
14 no dust. It had to be very cool. He couldn't be in
15 hot conditions or he would either go into a seizure
16 or he would pass out. He was very, very delicate.

17 Q. All right. What -- were there any special
18 things that had to be purchased or changes made in
19 the room in which Gavin stayed at your grandmother
20 and grandfather's.

21 A. Yes.

22 Q. Could you describe that to the ladies and
23 gentlemen of the jury.

24 A. In that room, the carpet was totally torn
25 out, and they put linoleum down. Because his bones,
26 they ache a lot. And then my mom bought an
27 orthopedic-type bed. And then all the walls were
28 repainted. They bought an air conditioning -- like 607

1 a little unit, tore a hole through that wall, so
2 the -- like the bad heat would go out through the
3 air conditioning.

4 Q. Were there any sort of little treats that
5 were bought for Gavin during this time.

6 A. Yeah, his --

7 MR. MESEREAU: Objection; leading.

8 THE COURT: Overruled.

9 You may answer.

10 THE WITNESS: Yes, because we constantly
11 wanted to make him very happy because of the things
12 that the doctors were telling us. So my mom bought
13 him a T.V., a DVD player, a stereo. That's all I
14 remember right now.

15 Q. BY MR. SNEDDON: Now, the things that you
16 just described, what room in the house were those
17 items located.

18 A. In one of the bedrooms in my grandmother's
19 house.

20 Q. The one that Gavin occupied.

21 A. Yes.

22 Q. And with regard to this T.V. that was in the
23 room that Gavin was in, how big was this T.V..

24 A. About 25 inches or so. Not -- it was only
25 about -- the screen -- the screen's only about that
26 big.

27 MR. SNEDDON: Your Honor, at this time I'm
28 going to show counsel some more photographs. 608

1 Q. The first photograph I'm going to show you
2 is People's 14.
3 Your Honor, would it be all right for me to
4 stay here to lay the foundation and then go back to
5 ask the questions.
6 THE COURT: All right.
7 Q. BY MR. SNEDDON: Do you recognize the people
8 depicted in that photograph.
9 A. Yes.
10 Q. Is that an accurate representation of those
11 individuals as they were at that point of time.
12 A. Yes.
13 Q. We'll go through who they are in just a
14 second.
15 I'm going to show you a photograph marked as
16 Exhibit 199. Do you recognize that photograph.
17 A. Yes.
18 Q. Do you recognize the people depicted in that
19 photograph.
20 A. Yes.
21 Q. Is that an accurate representation of those
22 people at that particular point in time.
23 A. Yes.
24 Q. And with regard to Exhibit No. 49, ask if
25 you recognize the people depicted in that
26 photograph.
27 A. Yes.
28 Q. Is that photograph an accurate 609

1 representation of those people at that point in
2 time.
3 A. Yes.
4 Q. And lastly, I'm going to show you a
5 photograph marked as 337 for identification. Do you
6 recognize that.
7 A. Yes.
8 Q. Is that an accurate depiction of how those
9 individuals looked in that photograph at that
10 particular point in time.
11 A. Yes.
12 Q. All right. Now, if you could just go back
13 and put them -- yeah, that's good. I'll -- all
14 right.
15 Move they be admitted into evidence, Your
16 Honor.
17 MR. MESEREAU: No objection, Your Honor.
18 THE COURT: They're admitted.
19 MR. SNEDDON: All right. And we're going to
20 use the display again, Your Honor, with the Court's

21 permission.
22 Q. Miss Arvizo, do you recognize the people
23 depicted in that photograph.
24 A. Yes.
25 Q. Who are the people in that photograph.
26 A. Me, Star, Gavin, Chris; and the baby,
27 Dustin. And Aja.
28 Q. And do you recall -- 610

1 BAILIFF CORTEZ: It's back on.
2 THE COURT: Give us the exhibit number that's
3 being shown to the jury.
4 MR. SNEDDON: I'm sorry, Your Honor. This
5 would be Exhibit No. 14, Your Honor.
6 Q. I think I was about to -- I think I was
7 about to ask you, do you recall when this particular
8 photograph was taken.
9 A. Yes.
10 Q. And where were you.
11 A. We were at Chris Tucker's older brother's
12 wedding.
13 Q. So he invited you to a wedding with him.
14 A. Yes.
15 Q. And do you recall approximately what -- like
16 what year was it.
17 A. I don't remember.
18 Q. Do you remember what grade in school you
19 were in.
20 A. I know I was still in high school, but I
21 don't remember.
22 Q. All right. Now I'm going to ask you to pick
23 up the exhibit that has the number "199" on it.
24 A. Yes.
25 Q. Do you see that.
26 A. Yes.
27 Q. Do you recognize the people depicted in that
28 photograph. 611

1 A. Yes.
2 Q. And with regard to the person in the upper
3 left-hand side with the blue shirt on, who's that.
4 A. That's Star.
5 Q. And the person that has the little visor --
6 MR. SNEDDON: I don't need this, Your Honor.
7 THE BAILIFF: They're on their way, Judge.
8 BAILIFF CORTEZ: Should I put -- turn it
9 back on.
10 Q. BY MR. SNEDDON: With regard to the person
11 with the little visor on that says "Raiders," who is
12 that.

13 A. That's Gavin.
14 Q. And from the photograph, can you tell
15 whether or not this was taken during the time that
16 he was having this battle with cancer.
17 A. Yes.
18 Q. And of course I think we all recognize the
19 person with his arm draped around him; is that
20 right.
21 A. Yes.
22 Q. Who is that.
23 A. That's Kobe Bryant.
24 Q. And that jersey that's depicted on the table
25 there, did Gavin end up getting that jersey and
26 wearing it.
27 A. Yes.
28 Q. All right. Now, if you could pick up the 612

1 photograph marked as 49 for us, if you would. Do
2 you have that.
3 A. Yes.
4 Q. All right. Okay. Now, who are the
5 people -- who are the people in that photograph.
6 A. Me, Gavin, Star, and Louise.
7 Q. Do you know Louise's last name.
8 A. Palanker.
9 Q. And do you recall when this was taken.
10 A. This was during the comedy camp.
11 Q. Is that when you first met her.
12 A. Yes.
13 Q. Now, after you met Louise Palanker, did you
14 stay friends with her.
15 A. Yes.
16 Q. Could you describe to the ladies and
17 gentlemen of the jury what the nature -- nature of
18 the relationship was between you and her, the
19 family.
20 A. She would come over to our house. She was
21 just very loving. Very sweet lady. She cared about
22 us a lot.
23 Q. When Gavin was diagnosed with cancer and
24 during the time that he was being treated for
25 cancer, was she still coming to see the family.
26 A. Yes.
27 Q. Do you know about, during that period of
28 time, how long it was that she was with you and the 613

1 family.
2 A. Like --
3 Q. That's a bad question. That's a bad
4 question.

5 How often did she come to see Gavin.
6 A. Very often.
7 Q. Would she come to the house.
8 A. Yes.
9 Q. And you were there when she came.
10 A. Yes.
11 Q. And to your knowledge, did she give money to
12 your family.
13 A. Yes.
14 Q. All right --
15 THE COURT: Do you want to just wait a
16 minute.
17 MR. SNEDDON: I guess I can. I didn't know
18 how long he was going to be, Your Honor. I guess we
19 don't want his head popping up when I show the
20 photographs.
21 THE SOUND TECHNICIAN: My apologies.
22 THE COURT: Thank you, Peter.
23 MR. SNEDDON: Try it again.
24 Q. All right. Now, if you could take the next
25 photograph, which I believe is marked as 337. Do
26 you see that one in front of you.
27 A. Yes.
28 Q. All right. Now, who is the person in the 614

1 middle of that photograph.
2 A. That's Gavin.
3 Q. And can you tell -- who's the person over on
4 the right-hand side.
5 A. That's Star.
6 Q. Now, do you recognize the room in which this
7 photograph is taken.
8 A. Yes.
9 Q. Could you tell the jury what it is, what
10 room it is.
11 A. It's the room that we fixed up for Gavin in
12 my grandma's house.
13 Q. And is that what Gavin looked like.
14 A. Yes.
15 Q. Now, do you, of your own personal knowledge,
16 know where the money came to fix that room up.
17 A. Yes.
18 Q. Who.
19 A. Louise.
20 Q. She gave you the money to do all that.
21 A. Yes.
22 Q. Now, you talked about an air conditioning
23 unit that had to be put in the room so that he
24 wouldn't go into seizures. Do you see that air
25 conditioning unit in that photograph.
26 A. Yes. It's right behind Star's head.
27 Q. There's a little laser up there. Do you see

28 that little black, long thing that looks like a 615

1 pencil. Well, I guess it's not up there.

2 MR. ZONEN: Right there.

3 Q. BY MR. SNEDDON: Could you turn around to
4 the exhibit that's been displayed on the board
5 there. And this is Exhibit 337. And can you point
6 out the air unit you were talking about.

7 A. It's right there.

8 Q. Okay. That's right behind Star's head.

9 And is the -- Gavin appears to be seated on
10 a bed.

11 A. Yes.

12 Q. Is that the bed that you bought, or was that
13 bed in there before.

14 A. No, that was the new bed.

15 MR. SNEDDON: All right. I think we can
16 take the photograph down, Your Honor, and put the
17 lights back on.

18 Q. Did you ever meet an individual by the name
19 of Carol Lamir.

20 A. Yes.

21 Q. Where did you meet her.

22 A. We met her at a dance studio.

23 Q. Did you -- how did that come about that you
24 met her at the dance studio.

25 A. Well, we just started a dance -- well, we
26 went to Mr. and Mrs. Kennedy's dance studio.

27 Q. I couldn't get that, so I'm sure the jury
28 didn't. Say it again. 616

1 A. We went to a dance studio. Mr. and Mrs.

2 Dance Studio -- Mr. and Mrs. Kennedy's dance studio.

3 Q. Was that before or after you had attended
4 the comedy camp.

5 A. This is way before.

6 Q. And you say "we." Who's "we".

7 A. Me and my brothers.

8 Q. What kind of a dancing school was it.

9 A. Kind of everything. But mostly, like, tap
10 was focused on.

11 Q. Now, did you, as a result -- let me ask you
12 this: Ms. Lamir, was she working there, or how did
13 you meet her.

14 A. Her grandson was taking a class there.

15 Q. So you met her through a mutual
16 acquaintance.

17 A. Yes.

18 Q. Did you ever stay with Miss Lamir.

19 A. Yes.

20 Q. And when I say "stayed," where did you stay
21 with her.
22 A. At her house.
23 Q. And do you recall on how many occasions that
24 was.
25 A. A couple, three maybe. I don't remember.
26 But I would stay about a week or so.
27 Q. And do you remember anything in particular
28 about your stays with Mrs. Lamir. 617

1 A. They weren't that pleasant.
2 Q. I'm sorry.
3 A. They weren't that pleasant.
4 Q. Why.
5 A. Because I'd mostly clean and do stuff for
6 her.
7 Q. Now, was there a time when your mother and
8 your father became separated.
9 A. Yes.
10 Q. And do you recall approximately when that
11 was.
12 A. That was during my sophomore year.
13 Q. And during that year, do you remember about
14 whether it was in the spring part of that year or
15 the fall --
16 A. The beginning.
17 Q. Now, when your father and your mother
18 separated, where did the family -- where did you
19 stay. Where did you live after that.
20 A. Me and my mom and my brothers stood at the
21 East L.A. apartment.
22 Q. So he moved out.
23 A. Yes.
24 Q. Do you remember what school you were in at
25 the time your father left.
26 A. I was still in the Hollywood High School.
27 Q. And so that would have been -- how many
28 years did you go to Hollywood High School. 618

1 A. Two.
2 Q. And that would have been what years. I
3 mean, in terms of the four years --
4 A. 2000. Or -- 2001.
5 Q. But is it like senior-junior.
6 Junior-sophomore.
7 A. Well, when he left.
8 Q. Well, how many years did you go to Hollywood
9 High.
10 A. Two.
11 Q. Okay.

12 A. Freshman and sophomore.
13 Q. Okay. That's what I was trying to get at.
14 Now, after Hollywood High School, where did
15 you go your junior year.
16 A. Roosevelt High School.
17 Q. And how far is Roosevelt High School from
18 the place where you lived at Soto Street.
19 A. Three lights. It's four blocks or so. It's
20 not that far.
21 Q. And how -- this would have been your junior
22 year now.
23 A. Yes.
24 Q. And did you complete the whole junior year
25 at Roosevelt.
26 A. Yes. Well, most of it. I finished my
27 sophomore year there.
28 Q. All right. So you didn't complete two full 619

1 years at Hollywood.
2 A. No, I left right before my sophomore year
3 ended at Hollywood High School.
4 Q. And then the next year, you took up at
5 Roosevelt.
6 A. Yes.
7 Q. And this would have been your junior year.
8 A. Yes.
9 Q. Now, at the time that you -- that your
10 father left, you folks still lived at Soto Street,
11 correct.
12 A. Yes.
13 Q. At the time that you went to school at
14 Roosevelt, where did the family live.
15 A. We still lived at the East L.A. apartment.
16 Q. Is that -- what's the address there, the
17 street at least.
18 A. Yeah, the Soto Street apartment.
19 Q. Let's just refer to it as the Soto Street
20 apartment.
21 A. Okay.
22 Q. So everybody knows what you're talking about
23 when we talk about that. Okay.
24 A. Okay.
25 Q. Now, during the time that you were living at
26 the Soto Street apartment, during the summer, did
27 you ever go to any academies.
28 A. Yes. 620

1 Q. Now, I'm going to show you another picture.
2 A. Okay.
3 MR. SNEDDON: I think what I'll do, I'll

4 save us some time here, Your Honor.
5 Q. All right. I have three more photographs.
6 And let's take these and put them up here out of the
7 way, so we don't get them mixed up.
8 And, first of all, let's just start with
9 these three.
10 A. Okay.
11 Q. And I'm just going to ask you a couple of
12 questions. Do you recognize the person depicted in
13 that photograph.
14 A. Yes.
15 Q. Is that an accurate depiction of what she
16 looks like.
17 A. Not right now.
18 Q. Not right now. But I mean --
19 A. Not her hair.
20 Q. Not her hair right now.
21 A. But, yes.
22 Q. Okay. And the next person -- the next
23 photograph, which is 35.
24 THE COURT: What exhibits are you referring
25 to.
26 MR. SNEDDON: I think I mentioned it was 31,
27 Your Honor.
28 THE COURT: Thank you. 621

1 MR. SNEDDON: And the next one is 35.
2 Q. Do you recognize that.
3 A. Yes.
4 Q. And is that an accurate depiction of the
5 person.
6 A. Yes.
7 Q. Okay. And let's go to the next one, which
8 is -- move your hand back a little -- 338. Do you
9 recognize that.
10 A. Yes.
11 Q. Is that an accurate depiction of the people
12 depicted in there.
13 A. Yes.
14 MR. SNEDDON: Move they be admitted into
15 evidence.
16 MR. MESEREAU: No objection, Your Honor.
17 THE COURT: Admitted.
18 MR. SNEDDON: All right. If we could have
19 the lights down for just a second.
20 Q. And I want to direct your attention to the
21 exhibit marked as 31 in evidence. No, not that one.
22 I'm sorry, my fault. There. 31.
23 Do you recognize that person.
24 A. Yes.
25 Q. Who is that.
26 A. That's my mommy.

27 Q. It's your who.
28 A. Mommy. 622

1 Q. You say she doesn't look like that now,
2 because her hair -- what's different.
3 A. Her hair is darker and shorter.
4 Q. Other than that, it looks like your mom.
5 A. Yes.
6 Q. All right. The next one, let's go to 35.
7 All right. Who's that.
8 A. That's David.
9 Q. David who.
10 A. My father.
11 Q. All right. Let's go to the next one.
12 All right. Do you recognize that
13 photograph.
14 A. Yes.
15 Q. And what was the occasion for this
16 particular photograph; do you remember.
17 A. Just taking pictures of each other. And I
18 had my Explorer uniform on. So we just went and
19 took pictures.
20 Q. Okay. What -- you say your "Explorer
21 uniform on." What do you mean by that. What is an
22 Explorer.
23 A. I worked with the Los Angeles Police
24 Department.
25 Q. And how long did you work for them.
26 A. For about a year.
27 Q. Did you have to go to some kind of training
28 before you could work for the department. 623

1 A. Yes.
2 Q. And what kind of training did you go to.
3 A. It was a little academy. It was about 12
4 Saturdays during the summer.
5 Q. And then at the end, there's a --
6 A. A graduation.
7 Q. And then you get a uniform.
8 A. Yeah.
9 Q. Is that what you wore to work when you went
10 to work.
11 A. Yeah.
12 THE COURT: What exhibit number is it.
13 MR. SNEDDON: 338, Your Honor.
14 All right. You can take that photograph
15 down, and we can get the lights back on, Your Honor.
16 Q. Now, you told the ladies and gentlemen of
17 the jury that at some point in time you had gone to
18 the ranch, Mr. Jackson's ranch, Neverland Valley

19 Ranch. Did -- to your knowledge, did Mr. Jackson
20 ever give the family any presents.
21 A. Yes.
22 Q. Now, with regard to your going to the police
23 academy, were any of those presents used in
24 connection with that.
25 A. What do you mean.
26 Q. Well, just what I said. Were there any
27 things that Mr. Jackson gave you that were used
28 in -- 624

1 A. Yes.
2 Q. What.
3 A. It was a white Bronco.
4 Q. So Mr. Jackson gave you folks a car.
5 A. Yes.
6 Q. Do you remember when that was.
7 A. That was during Gavin's cancer.
8 Q. Do you remember when it was in relationship
9 to the academy, how much before you started the
10 academy.
11 A. How long did we keep it.
12 Q. Let me go back and ask you another question.
13 When you went to the Explorer's academy --
14 A. Yes.
15 Q. -- was this during the summer or was it
16 during the school year.
17 A. It was during the summer.
18 Q. And do you remember between what grades it
19 was.
20 A. Freshman -- freshman and sophomore, I think
21 it was. Yeah, because I was -- I graduated in 2001.
22 The academy was in August. It ended in August. I
23 started it -- I joined the Explorers in May. The
24 academy ended in August.
25 Q. And who took you to the academy on
26 Saturdays.
27 A. My mom did.
28 Q. And how did you get there. 625

1 A. We would take the white Bronco.
2 Q. Do you know how long you'd had that Bronco
3 before you started the academy.
4 A. It was given to Gavin like in the middle of
5 his cancer, so like six months or so before that.
6 Q. And do you know what happened to the Bronco.
7 A. It started stalling and started breaking
8 down, and just wouldn't turn on anymore.
9 Q. Okay. Did you keep it at the house.
10 A. Yes.

11 Q. What happened to it after that.
12 A. Somebody came and picked it up and took it
13 away.
14 Q. Did you ever see it again.
15 A. No.
16 Q. Now, were there other things that you did
17 with Chris Tucker, other than going to the Neverland
18 Valley Ranch with him.
19 A. Yes.
20 Q. What other things did you do with Chris
21 Tucker.
22 A. He took us to the Oakland game. We went --
23 Q. Oakland --
24 A. Raiders game.
25 Q. Okay.
26 A. And we would just go to his house. And
27 sometimes I would go sleep over Aja's house.
28 Q. Who is Aja. 626

1 A. That's Chris Tucker's fiancée.
2 Q. Any other occasions you recall being places
3 with Mr. Tucker.
4 A. Not that I remember right now.
5 Q. At some point in time, you went back to the
6 ranch on another occasion; is that correct.
7 A. Yes.
8 Q. Other than the first one you've talked
9 about.
10 A. Yes.
11 Q. Tell the ladies and gentlemen of the jury
12 about that.
13 MR. MESEREAU: Objection; vague.
14 THE COURT: Sustained.
15 Q. BY MR. SNEDDON: All right. Do you recall
16 approximately when it was you went back to the
17 ranch.
18 A. About a year.
19 Q. What time of the year was this, now.
20 A. I think it was during the summer. I really
21 don't remember.
22 Q. Okay. Let me ask you this, because that was
23 probably a bad question on my part: When you went
24 back to -- to the ranch with regard to the Bashir
25 filming that you've described to us --
26 A. Yes.
27 Q. -- do you remember when that was. What time
28 of year was that. 627

1 A. That was in November. The Bashir taping.
2 Q. Who went.

3 A. Me and my brothers.
4 Q. And how did you get there.
5 A. A limo came and picked us up.
6 Q. And when you got to the ranch, could you
7 tell the jury, what was the first thing that
8 happened after you got out of the limo.
9 A. We walked to -- in the entrance, in the back
10 entrance. Then Mr. Jackson came and met us.
11 Q. All right. What part of the house were you
12 in.
13 A. In the back of -- right before you get to
14 the kitchen. There's like refrigerators and stuff
15 right there.
16 Q. Now, when you went into the house, did your
17 brothers go with you.
18 A. Yes. We all three went in at the same time.
19 Q. Could you tell the ladies and gentlemen of
20 the jury what happened when Mr. Jackson appeared.
21 A. He told me and Star -- he told me and Star
22 to excuse him, that he needed to talk to Gavin for a
23 couple minutes.
24 Q. And did you see where Mr. Jackson went.
25 A. They walked into the main dining room.
26 Q. You say "they." Who is that.
27 A. Gavin and Mr. Jackson.
28 Q. And is that an enclosed area. 628

1 A. Yeah. It has a swinging door. You can
2 close it.
3 Q. So they went on the other side of the
4 swinging door.
5 A. Yes.
6 Q. And how long were Mr. Jackson and your
7 brother gone.
8 A. About five, ten minutes.
9 Q. Now, after -- after they -- after that, what
10 happened.
11 A. They did the taping.
12 Q. All right. When you say "They did the
13 taping," will you tell them what you saw. Where
14 were you.
15 A. I was standing inside the kitchen. And they
16 were sitting down in the little sitting area right
17 in front of the kitchen.
18 Q. So you could see what was going on.
19 A. Yes.
20 Q. And did you see your brother interviewed.
21 A. Yes.
22 Q. Was there another part of the time that you
23 were there that -- where you were filmed.
24 A. Yes.
25 Q. And where did that occur.

26 A. Inside the kitchen.
27 Q. What was going on.
28 A. Gavin and Star were doing their little Navy 629

1 marching thing. And I was standing there talking to
2 Mr. Jackson.

3 Q. Now, when the three of you went to the ranch
4 that day, you were picked up on the limo and taken
5 to Mr. Jackson's ranch, did you know what the
6 purpose of the trip was.

7 A. No.

8 Q. Did you discuss it with your brothers at
9 all.

10 A. No.

11 Q. Did you know there was going to be a film
12 that day.

13 A. I think I remember just -- when we got
14 there, we saw -- we thought it was just one of his,
15 like, personal tapings.

16 Q. What do you mean by "personal tapings".

17 A. Well, because there had been a previous
18 video that he taped of him and Gavin and Star.

19 Q. After the filming was completed, did you
20 stay at the ranch.

21 A. Yes.

22 Q. Did your brothers, to your knowledge, stay
23 at the ranch.

24 A. Yes.

25 Q. How long did the three of you stay.

26 A. Just that night.

27 Q. And so you left the next day.

28 A. Yes. 630

1 Q. Now, Mr. Jackson; did you see Mr. Jackson
2 after that.

3 A. After they were done with the taping, he
4 left.

5 Q. So how long, in your estimation, were you
6 there in Mr. Jackson's house with Mr. Jackson from
7 the time that you first walked through the door to
8 the time that Mr. Jackson walked out. How long do
9 you think that was.

10 A. Half an hour, 45 minutes.

11 Q. Did your mom go with you.

12 A. No.

13 Q. Now, at the time that you were called by Mr.
14 Jackson -- strike that.

15 At the time you were called and you went to
16 the ranch for the Bashir filming --

17 A. Yes.

18 Q. -- where were you living.
19 A. We were living at the East L.A. apartment.
20 Q. And who was living there.
21 A. Me, my mom and my brothers.
22 Q. And where were you going to school.
23 A. Roosevelt.
24 Q. After the time that you -- well, let me just
25 ask one other thing here. Are you familiar or
26 acquainted with a person by the name of Jay Jackson.
27 A. Yes.
28 Q. And who, to your knowledge, is Jay Jackson. 631

1 A. He's my stepfather.
2 Q. And do you remember approximately when it
3 was you first met Mr. Jackson, Jay Jackson.
4 A. It was after the Bashir taping, I think. I
5 don't -- yeah.
6 Q. And to your knowledge, what is Mr. Jackson's
7 profession or occupation.
8 A. He's a major in the Army.
9 Q. And was he a major in the Army at the time
10 that you first met him.
11 A. Yes.
12 Q. And to your knowledge, did Mr. Jackson and
13 your mother begin to date.
14 A. Yes.
15 Q. Now, after the Bashir filming, did something
16 unusual happen with regard to people coming around
17 the house.
18 A. Yes.
19 Q. Would you tell us what happened.
20 A. Well, a couple of British reporters came to
21 the East L.A. apartment.
22 Q. Do you know of your own personal
23 knowledge -- well, were you there when they came.
24 A. Yes.
25 Q. And who did they want to talk to.
26 A. They wanted to talk to Gavin.
27 Q. Was your mother there when they came.
28 A. Yes. 632

1 Q. Who else was there.
2 A. Me and my brother and Jay.
3 Q. Did anybody actually do an interview with
4 them that day.
5 A. No.
6 Q. Now, where do your grandparents live.
7 A. They live in El Monte.
8 Q. And in relationship -- I know this is kind
9 of -- but just give us a rough estimation. How far

10 is it from where they live in El Monte to where you
11 lived on Soto Street in East Los Angeles.
12 A. Without any traffic, about 20, 30 minutes.
13 Q. Now, were you ever present at your
14 grandparents when any reporters came.
15 A. Do you mean during that time that --
16 Q. Yeah.
17 A. No.
18 Q. During that time.
19 Now, at this point in time, where the
20 reporters came to the Soto Street apartment -
21 okay. - what high school were you going to.
22 A. Roosevelt.
23 Q. Still at Roosevelt.
24 A. Yes.
25 Q. And still living in the apartment.
26 A. Yes.
27 Q. Shortly after that -- let me go back. Do
28 you -- do you have a cell phone. 633

1 A. Right now, yes.
2 Q. Did you have a cell phone then.
3 A. No.
4 Q. And so if you wanted to call your mother,
5 how did you do that.
6 A. I would call her from the pay phone.
7 Q. Did you have a practice or a custom of doing
8 that.
9 A. Yeah. I would always call her probably
10 during my lunch or right before I would get on the
11 bus to go home, just to say hi or tell her I'm
12 coming home, or see how the boys are doing.
13 Q. Do you consider your family a close family.
14 A. Very close.
15 Q. And what do you mean by that.
16 A. Well, me and my brothers especially were
17 very close because of what we've gone through with
18 my father and stuff.
19 Q. When you -- when you meet somebody, how do
20 you greet them.
21 A. We hug them.
22 Q. Even if it's the first time.
23 A. Yes.
24 Q. And you did that to me, didn't you.
25 A. Yes.
26 Q. You do it to everybody.
27 A. Yes.
28 Q. Who taught you to do that. 634

1 A. My mom did.

2 MR. SNEDDON: Your Honor, I -- it's eleven
3 o'clock. Is that not the right time. I'm sorry.
4 Okay. I just want to make sure.
5 THE COURT: You sure like those breaks, don't
6 you.
7 (Laughter.)
8 MR. SNEDDON: Well, when your stomach starts
9 growling, it's telling you something. You don't,
10 so....
11 Q. All right. Now -- one of your better ones.
12 Did you at some time talk to your mom on the
13 phone and learn that you were going to be going on a
14 trip.
15 A. Yes.
16 Q. Could you tell the jury about that.
17 A. I called my mom, just a regular phone call,
18 and then she said that --
19 MR. MESEREAU: Objection; hearsay.
20 THE COURT: Sustained.
21 Q. BY MR. SNEDDON: So you called your mom on
22 the phone.
23 A. Yes.
24 Q. And without telling us what was said, did
25 your mom talk to you.
26 A. Yes.
27 Q. And as a result of what your mom told you,
28 did you do something. 635

1 A. Yes.
2 Q. Okay. What did you do.
3 A. Went -- we went to the East L.A. apartment
4 and then Adrian came and picked me up.
5 Q. When you went to the East L.A. apartment,
6 was your mother there.
7 A. No, she wasn't.
8 Q. Were your brothers there.
9 A. No.
10 Q. And do you know who Adrian is.
11 A. Yes.
12 Q. Who's Adrian.
13 A. He's kind of like Chris Tucker's
14 assistant/friend.
15 Q. And before you got in the car with this
16 Adrian, did you do anything while you were at the
17 house.
18 A. Tried to gather some things. I didn't
19 really have that many clothes there.
20 Q. Why did you do that.
21 A. Because we were going on a trip.
22 Q. Did you understand where you were going.
23 A. Yes.
24 Q. Where.

25 A. Miami.
26 Q. Okay. So you packed some clothes. And then
27 Adrian took you where.
28 A. He took me to Chris Tuck -- Chris Tucker's 636

1 house.
2 Q. Do you know where Chris Tucker lives.
3 A. Yes.
4 Q. Or lived at that time.
5 A. Yes.
6 Q. Where.
7 A. He lives off Reseda Boulevard. I don't know
8 what city it is. All I know is the street we get
9 off to go to his house on the freeway.
10 Q. And when you got to Chris Tucker's, who was
11 there.
12 A. My mom, my brothers, Chris, the bus driver.
13 I don't -- I don't remember.
14 Q. All right. When you all -- when you arrived
15 at Chris Tucker's, at any point in time did you
16 leave.
17 A. Yes.
18 Q. Where did you go.
19 A. We left in Chris Tucker's private bus and he
20 took us to a jet.
21 Q. Took you where.
22 A. To a private jet.
23 Q. And you say "us." Could you tell us who
24 "us" were.
25 A. Me, my brothers and my mom.
26 Q. All right. Was there anybody else on the
27 bus.
28 A. Chris. 637

1 Q. Any of his family.
2 A. No.
3 Q. And do you know where -- you ended up at an
4 airport somewhere. Do you know where it was.
5 A. No. I don't remember. It was dark.
6 Q. So you got into -- now, was this like a
7 commercial airline, plane.
8 A. It was a private jet.
9 Q. All right. And who got on the plane.
10 A. Me, my brothers, and my mom and Chris.
11 Q. Were there any other people on the plane.
12 A. Besides the pilot and the flight attendant,
13 no.
14 Q. So there was a flight attendant.
15 A. Yes.
16 Q. Was that a male or a female.

17 A. Female.
18 Q. Now, about what time is it when you finally
19 got to the airport.
20 A. It's nighttime. Like early night.
21 Q. Was it light or dark.
22 A. Dark. Starting to fade.
23 Q. And you flew -- how long did the flight
24 last.
25 A. Five, six hours.
26 Q. And do you know where you were when you
27 landed.
28 A. Miami. 638

1 Q. Is that the first time you'd ever been in a
2 private jet.
3 A. Well, we went to Oakland in a private jet,
4 too, when he took us to the Oakland game.
5 Q. Mr. Tucker.
6 A. Yes.
7 Q. So that's the second time you've been in a
8 private jet.
9 A. Yes.
10 Q. On this particular occasion when you were
11 flying with Mr. Tucker, by this time, how long had
12 you known him.
13 A. For a while.
14 Q. Had you already been to his brother's
15 wedding.
16 A. Yes.
17 Q. And you'd already been to his house.
18 A. Yes.
19 Q. Did you consider him a good friend.
20 A. Yes.
21 Q. Now, tell us what happened when you got to
22 Miami.
23 A. We got off the plane. We went to Chris
24 Tucker's room for a while. We chatted. And then we
25 went to our room.
26 Q. Do you remember the name of the place that
27 you stayed at.
28 A. I just know it was a resort. 639

1 Q. Was it a nice resort.
2 A. Yes.
3 Q. Now, in relationship to where your room was,
4 where was Mr. Tucker's room.
5 A. I don't know. In a totally different
6 building.
7 Q. And do you remember, in terms of the
8 building that you were in with your room, on what

9 floor it was.
10 A. I don't remember. I think it was the sixth
11 floor. I'm not sure. I don't remember.
12 Q. It wasn't the bottom floor.
13 A. No.
14 Q. And on -- after you visited with Mr. Tucker,
15 you said you went back to your room. When you say
16 "you," who was with you.
17 A. My mom, my brothers and me.
18 Q. Were you all in the same room.
19 A. Yes.
20 Q. Now, when you got back to your room that
21 night, what did you do.
22 A. Went to sleep.
23 Q. And then the next morning, what did you do.
24 Do you remember what time you got up.
25 A. Early afternoon. And we got up and we went
26 to go see Mr. Jackson.
27 Q. Now, when you went to see Mr. Jackson, where
28 did you go in that building. 640

1 A. One floor up.
2 Q. And where was your room in relationship to
3 his room. I mean, it's one floor up, but do you --
4 A. Pretty much right on top of ours.
5 Q. When you got into Mr. Jackson's room, can
6 you describe what the room looked like.
7 A. It was very big. It had a kitchen, a living
8 room, bedroom, a little dining room area. And then
9 there was another room connected.
10 Q. With regard to the bedroom, was there a door
11 that led from the open area in the living room area
12 that you described to the bedroom.
13 A. Yes.
14 Q. So you could close the door.
15 A. Yes.
16 Q. It isn't like a regular hotel where there's
17 just a bed there and everyone's all in the same room
18 with the bed.
19 A. Yeah, it's different.
20 Q. Now, when you were in Mr. Jackson's room,
21 did you meet some people there for the first time.
22 A. Yes.
23 MR. MESEREAU: Objection; foundation.
24 THE COURT: Overruled.
25 Q. BY MR. SNEDDON: I'm sorry, I didn't hear
26 your answer.
27 A. Yes.
28 Q. Now, when you first got there, were you 641

1 introduced to some people, you personally. Were you
2 introduced to some people.
3 A. Yes.
4 Q. Was Mr. Jackson there when you got there.
5 A. Yes.
6 Q. Did Mr. Jackson introduce you to anybody.
7 A. Yes.
8 Q. Who did Mr. Jackson introduce you to.
9 A. To Dieter and Ronald.
10 Q. Do you know Dieter's last name.
11 A. No.
12 Q. Do you know Ronald's last name.
13 A. No.
14 Q. Did he introduce you to anybody else.
15 A. Two younger kids that were there too.
16 Q. Just using their first names, do you know
17 the first names of those children.
18 A. Marie Nicole and Aldo.
19 Q. Now, did you at some point meet anybody who
20 was related to those two children.
21 A. Yes.
22 Q. And who was that.
23 A. Frank.
24 Q. And do you remember Frank's last name.
25 A. Yes.
26 Q. What is it.
27 A. Tyson.
28 Q. And where was it that you met Mr. Tyson. 642

1 A. There, but I had heard of him before.
2 Q. You what.
3 A. I had never officially met him until being
4 at the resort.
5 Q. At the time that you met the people you
6 referred to as Dieter and Ronald, was Mr. Tyson in
7 the room at that time, or did he come in later.
8 A. I think he came in later.
9 Q. And who introduced you to Mr. Tyson.
10 A. I think it was just a hi to each other and
11 introduce ourselves. I don't remember.
12 Q. Okay. Were there any other people in the --
13 in Mr. Jackson's room other than Mr. Jackson and the
14 people you've just described.
15 A. When we first got there, there was the two
16 nannies and the three kids.
17 Q. Okay. Now, the two nannies. Did you ever
18 learn their names.
19 A. I just know one of their names.
20 Q. And who was that.
21 A. Grace.
22 Q. You don't know Grace's last name.
23 A. No.

24 Q. And you say "the three children." Are you
25 talking about Mr. Jackson's children.
26 A. Yes.
27 Q. And did -- were they -- they were in that
28 room at the time you got there. 643

1 A. Yes.
2 Q. Now, if we can just go back just a moment.
3 Do you remember about what time it was when
4 you first got to Mr. Jackson's room and you entered
5 the room and were introduced to Dieter and Ronald
6 and saw the children.
7 A. Yes.
8 Q. What time was it.
9 A. Early afternoon.
10 Q. So you guys slept in, huh.
11 A. Yeah.
12 Q. And do you recall -- what was the first
13 thing that occurred there after the introductions.
14 A. We just sat down, just -- I don't remember
15 really. We just sat down or played around, like
16 with the kids and stuff.
17 Q. You played with the kids.
18 A. Yeah, just --
19 Q. What kids.
20 THE COURT: She needs to speak up, Counsel.
21 THE WITNESS: Prince and Paris.
22 Q. BY MR. SNEDDON: Now, were your brothers
23 with you.
24 A. Yeah, they were in the same room.
25 Q. Did you at any point in time see the
26 defendant in this case, Mr. Jackson, and your
27 brother Gavin go back into Mr. Jackson's bedroom.
28 A. Yes. 644

1 MR. MESEREAU: Objection; leading.
2 THE COURT: Sustained.
3 MR. MESEREAU: Move to strike.
4 THE COURT: Stricken.
5 Q. BY MR. SNEDDON: Could you tell us whether
6 or not at some point in time on that particular day,
7 when you were in that particular room with those
8 particular people, that the defendant went anywhere
9 with your brother.
10 A. Yes.
11 Q. Okay. Would you tell us where.
12 A. He pulled him aside into his room.
13 Q. I couldn't hear you.
14 A. He pulled him aside into his room.
15 Q. Can you tell us whether or not the door was

16 open or closed after they went into his room.
17 A. It was shut.
18 Q. To your knowledge, did anybody else go in
19 the room with them at the time that they went in the
20 room and closed the door.
21 A. Not that I remember.
22 Q. Do you recall how long they were in there.
23 A. For 15, 30 minutes. I don't -- for a while.
24 I don't know approximately timewise.
25 Q. Were there -- were there any other times
26 while you were in the room that day that the
27 defendant in this case, Mr. Jackson, and your
28 brother Gavin went into that room again. 645

1 A. A couple of times.
2 Q. So how many times in total do you think it
3 was that your brother Gavin and Mr. Jackson went
4 back into his bedroom.
5 A. About two, three times.
6 Q. And on those occasions, can you tell us
7 whether or not, like the first time, the door was
8 closed or open.
9 A. It was closed.
10 Q. And like on the first occasion, to your
11 knowledge, did anybody else go in there with them.
12 A. Not that I remember.
13 Q. Now, how long did you stay in Mr. Jackson's
14 suite.
15 A. All day.
16 Q. Do you remember about what time it was you
17 left.
18 A. Nighttime, when we were going to go to
19 sleep.
20 Q. So was it light or dark outside.
21 A. Dark. We don't really know, because all the
22 windows were shut, all the curtains were closed.
23 Q. But you were tired, huh.
24 A. Yeah. It was -- it had to be night.
25 Q. Now, at any time on that particular day when
26 you were in Mr. -- let me just go back and make sure
27 we lay the foundation of this correctly so everybody
28 understands. 646

1 You got there at some time in the afternoon,
2 and you don't leave till sometime at the night.
3 A. Yes.
4 Q. Correct. Did you ever leave that room.
5 A. No.
6 Q. Mr. Jackson's complex there.
7 A. No.

8 Q. To your knowledge, did Gavin ever leave that
9 room.

10 A. No.

11 Q. And to your knowledge, did Star ever leave
12 that room.

13 A. No.

14 Q. Now, at some time during the time that
15 you're in Mr. Jackson's complex and the rooms that
16 he has there, did you see your brother Gavin act in
17 what you considered, in your opinion, to be
18 peculiar.

19 MR. MESEREAU: Objection. Leading; vague.

20 THE COURT: It's leading.

21 Q. BY MR. SNEDDON: Could you the tell the
22 ladies and gentlemen of the jury whether or not you
23 observed anything unusual about your brother's
24 behavior that night.

25 A. He was just very hyper.

26 Q. Describe what you mean by that.

27 A. Very talkative. Running around. Very, very
28 playful. 647

1 Q. Why did you consider that noteworthy.

2 A. I don't know. It was just more than usual.

3 Like more talkative, more jumpy and stuff.

4 Q. Now, on that particular evening -- let me
5 strike that.

6 During the time that you were in Mr.

7 Jackson's suite, did Mr. Jackson -- can you tell us
8 whether or not Mr. Jackson ever said anything with
9 regard to any of the programs that were going to be
10 seen on the television that night.

11 A. Yes.

12 Q. All right. What did he say.

13 A. For us not to watch it.

14 Q. Watch "it"; what's "it".

15 A. The Bashir documentary.

16 Q. How do you know he was talking about the
17 Bashir documentary.

18 A. Because he said, "The Bashir tape." Well --
19 yeah.

20 Q. Do you recall what his attitude was towards
21 that at the time that he said it, or his demeanor.

22 A. Kind of like upset about it; didn't want to
23 see it.

24 Q. At any point that night -- I've talked to
25 you about you and your brothers. At any point while
26 you were in Mr. Jackson's room that night, did your
27 mother leave.

28 A. No. Well, yeah, at one point she did. 648

1 Q. Okay. When was that.
2 A. During the Bashir taping.
3 Q. How do you know it was during the Bashir
4 taping.
5 A. Because Mr. Jackson already had said for us
6 not to watch it.
7 Q. And then she left.
8 A. Yeah, she went downstairs to our room.
9 Q. And what happened. When your mother left,
10 did anybody else leave after that.
11 A. Well, they came and asked where she was.
12 And then I told them that she was downstairs,
13 because she had a headache. And they went down and
14 got her.
15 Q. And she came back up to the room.
16 A. Yes.
17 Q. Do you remember who it was specifically who
18 went to get her.
19 A. I think it was Frank.
20 Q. Mr. Tyson.
21 A. Yes.
22 Q. All right. Let's show you some more
23 photographs at this point.
24 MR. MESEREAU: Oh, I'm sorry. Beg your
25 pardon.
26 MR. SNEDDON: All right. I have a series of
27 photographs that I've shown to counsel and I'd like
28 to be able to show them to the witness. I'll 649

1 identify them by number.
2 THE COURT: All right.
3 Q. BY MR. SNEDDON: I'm going to put these down
4 here for just a second. And before I ask any
5 questions, I'm going to move these others up here.
6 All right. With regard to the one that's in
7 front of you, that's People's No. 48 for
8 identification, do you recognize that photograph.
9 A. Yes.
10 Q. Is that an accurate depiction of that
11 particular individual.
12 A. Yes.
13 Q. Okay. Why don't you just turn that over on
14 top of that binder right there for just a second.
15 A. This.
16 Q. Not that way. No, no, no. All right.
17 There you go.
18 Okay. The next one is People's No. 43 for
19 identification. Do you recognize that person.
20 A. Yes.
21 Q. And who is that. Don't tell me who it is.
22 With regard to that, is that an accurate depiction

23 of that individual.
24 A. Yes.
25 Q. Flip that one over the other way. Flip them
26 this way so the jury doesn't see them.
27 A. Oh.
28 Q. With regard to the next one, which is 650

1 People's 22, do you recognize the person depicted in
2 that photograph.

3 A. Yes.

4 Q. Is that an accurate depiction of that
5 person.

6 A. Yes.

7 Q. Okay. Perfect.

8 And the next one is People's 21. Do you
9 recognize that person.

10 A. Yes.

11 Q. Is that an accurate depiction of that
12 individual.

13 A. Yes.

14 Q. Okay. And People's No. 20 for
15 identification, is that an accurate depiction of
16 that particular person.

17 A. Yes.

18 Q. All right. Flip that one over, if you
19 would.

20 And do you recognize that person.

21 A. Yes.

22 Q. Is that an accurate depiction of that
23 particular person.

24 A. Yes.

25 Q. Okay. Let's go on to the last one.

26 THE CLERK: Judge, we need a number.

27 THE COURT: What's the number on the last
28 one. 651

1 MR. SNEDDON: 18. Sorry.

2 Q. And with regard to the next one, which is
3 People's 17, do you recognize that person.

4 A. Yes.

5 Q. Is that an accurate depiction of that
6 particular person.

7 A. Yes.

8 Q. And why don't you flip them over and take
9 them all and put them right side up, and I'm going
10 to ask you some questions about it. Perfect.

11 Okay. Let's start with the one that has --
12 it's probably on the bottom, but People's 17.

13 And, Your Honor, if we could have the -- I
14 move that those be admitted into evidence.

15 MR. MESEREAU: No objection, Your Honor.
16 THE COURT: They're admitted.
17 Q. BY MR. SNEDDON: All right. We're now --
18 People's 17. Do you recognize that person.
19 A. Yes.
20 Q. Who is that.
21 A. That's Dieter.
22 Q. And where was that person -- when were you
23 first introduced to that person.
24 A. In Mr. Jackson's hotel room.
25 Q. And where, in what town.
26 A. Miami.
27 Q. Okay. Turn that one over, if you would.
28 Now, with regard to the individual -- I'm 652

1 sorry, Gordon.
2 All right. With regard to this particular
3 individual that you know by the name of Dieter --
4 okay. -- after you were introduced to this person
5 Dieter, did you -- could you tell us whether or not
6 he remained in the suite that day.
7 A. He came in and out.
8 Q. And when he came in and out, did you see
9 whether or not he had any interaction with the
10 defendant in this case, Mr. Jackson.
11 A. Yes.
12 Q. What kind of interaction.
13 A. They would go in the room and close the
14 door.
15 Q. In which room.
16 A. Mr. Jackson's room.
17 Q. The same one Gavin went in.
18 A. Yes.
19 Q. Do you remember on how many occasions that
20 occurred.
21 A. Several. I don't know.
22 Q. How many is "several".
23 A. Two, three.
24 Q. Okay. Now, let's go to the next one, which
25 is I believe 18. It's probably on the bottom. I
26 think I -- there you go.
27 All right. Do you recognize the person in
28 People's 18. 653

1 A. Yes.
2 Q. Who is that.
3 A. That's Ronald.
4 Q. That's the person you were introduced to as
5 Ronald.
6 A. Yes.

7 Q. Now, at the time you entered the suite, did
8 you see this person Ronald that day and did he stay,
9 or leave, or what.
10 A. He would go in and out also.
11 Q. When you say "in and out," do you mean in
12 and out of the --
13 A. Of the hotel room.
14 Q. Do you know whether or not he ever had any
15 interaction that day with Mr. Jackson.
16 A. Yes.
17 Q. And what kind of interaction did he have.
18 A. He would go in the room also and close the
19 door.
20 Q. Now, when you said he would go in the room
21 and close the door with Mr. Jackson, were there any
22 other people that would go in and out with them.
23 A. Dieter.
24 Q. So it was the three of them.
25 A. Yes.
26 Q. All right. Let's go to the one that's
27 marked as People's 20. Do you recognize that
28 person. 654

1 A. Yes.
2 Q. And who is that.
3 A. That's Frank.
4 Q. Do you know his last name.
5 A. Mr. Tyson, yes.
6 Q. That's how you knew him by.
7 A. Frank, yes.
8 Q. Now, with regard to this particular
9 individual, was he in the room also during that day.
10 A. Yes.
11 Q. Was he there the entire time or did he come
12 and go.
13 A. He would come and go also.
14 Q. Was he ever -- did you ever see him interact
15 with Mr. Jackson that day.
16 A. Kind of talking, but I don't remember
17 really.
18 Q. Can you tell us whether or not --
19 MR. SANGER: I'm sorry, Your Honor, it's
20 hard to hear the answer.
21 Q. BY MR. SNEDDON: Can you lean in and tell us
22 again. Did he have any interaction with the
23 defendant that day, Mr. Jackson.
24 A. Yeah, they would talk, but I don't really
25 remember.
26 Q. Did Mr. Tyson go back in the room when Mr.
27 Jackson would go in the room with this person Dieter
28 and this person Ronald. 655

1 A. I don't remember if it was with them, but I
2 think I saw him once. I don't remember.
3 Q. All right. Let's go to the next one, which
4 would be 21 for -- right. Do you recognize the
5 person depicted in that photograph.
6 A. Yes.
7 Q. And what is that person's name.
8 A. Aldo.
9 Q. The first name.
10 A. Aldo.
11 Q. And did he have a nickname that he went by.
12 A. Yes.
13 Q. What was it.
14 A. Baby Rubba. Baby Rubba.
15 Q. Okay. And was this person in the suite that
16 day.
17 A. Yes.
18 Q. And do you know whether or not this
19 particular individual left that day.
20 A. No.
21 Q. He was there the whole time that you were
22 there.
23 A. Yes.
24 Q. At the time that you first met this person
25 Aldo, do you recall what age he was.
26 A. Around Star's age. I don't remember.
27 Q. All right. Let's go to the next photograph,
28 which would be 22. Do you recognize that person. 656

1 A. Yes.
2 Q. And who is that.
3 A. Marie Nicole.
4 Q. And with regard to this particular person,
5 was she in the suite -- did she remain in the suite
6 after you were introduced to her.
7 A. Yes.
8 Q. And do you know whether or not she left at
9 any time before you did.
10 A. No.
11 Q. And we have one left.
12 A. Two left.
13 Q. Two left, okay. And with regard to --
14 what's the number on this one.
15 A. 43.
16 Q. 43. With regard to 43, who is that.
17 A. That's Grace.
18 Q. That's the person you knew as Grace.
19 A. Yes.
20 Q. Did you know what Grace's responsibilities
21 were for Mr. Jackson.

22 A. She was the nanny.
23 Q. And by "nanny," what do you mean.
24 A. She took care of the kids.
25 Q. And this lady depicted in the photograph,
26 People's 43, was in the room that day.
27 A. Yes. For a moment. Yeah.
28 Q. For a moment. 657

1 A. They didn't stay the whole time.
2 Q. And we have one last one. And the number on
3 that is.
4 A. 48.
5 Q. All right. And People's 48, who's that
6 person.
7 A. That's my stepfather, Jay Jackson.
8 Q. All right.
9 I think we can turn the lights back on, Your
10 Honor.
11 The night following -- well, let me go back.
12 Did you see any other activities on this --
13 the day we're talking about, okay, when you were in
14 the suite and you got there in the afternoon and you
15 stayed there till late at night, just so we know
16 we're talking about the same day, did you see any
17 other occasions where your brother Gavin would go
18 somewhere with Mr. Jackson.
19 A. No.
20 Q. So --
21 A. We stood in the suite the whole day.
22 Q. Okay. Now, after that evening, you left.
23 Where did you go. Where did "you" go.
24 A. Straight to my room.
25 Q. And did anybody else go with you.
26 A. Well, me, my brothers and my mom.
27 Q. So you all left at the same time.
28 A. Yes. 658

1 Q. When you went back to your room that
2 evening, did you leave the room at any time.
3 A. No.
4 Q. Now, the next day when you got up, what did
5 you -- what was the first thing you did, if you
6 recall, of significance.
7 A. Just went straight up to Mr. Jackson's room.
8 Q. I'm sorry.
9 A. We just went straight up to Mr. Jackson's
10 room.
11 Q. All of you.
12 A. Yes.
13 Q. Or just you.

14 A. All of us.
15 Q. Now, on this particular day, did you get
16 some kind of a treat.
17 A. This is the last day that we were there.
18 This is the last day, we got -- I got a manicure and
19 pedicure.
20 Q. And how did that come about.
21 A. Well, me and Chris Tucker and Gavin, Star,
22 went to, like, the spa area.
23 Q. You have to speak up.
24 A. Me and Mr. -- Chris Tucker and my brothers,
25 we all went to the spa area.
26 Q. Okay. And you got --
27 A. I got a manicure and pedicure, and the boys
28 and Mr. Tucker got massages. 659

1 Q. Now, on this particular day, after that, did
2 you leave.
3 A. Yes.
4 Q. Where did you go.
5 A. We went to the ranch. Neverland Ranch.
6 Q. How did you get there.
7 A. On a private jet.
8 Q. And who was on the jet.
9 A. Me, my brothers, Paris and Prince, and
10 Prince the II, Mr. Jackson, Grace, another nanny,
11 Marie Nicole, Aldo, and I think Mr. Jackson's
12 doctor.
13 Q. And was Mr. Jackson on the plane.
14 A. Yes.
15 THE COURT: Is this a good place for a break.
16 MR. SNEDDON: I want to keep going, Judge.
17 THE COURT: We'll take our morning break.
18 (Recess taken.)
19 THE COURT: Go ahead.
20 Q. BY MR. SNEDDON: Before we start talking
21 about the plane ride from Miami, I want to go back
22 and -- go back, if we could.
23 A. Okay.
24 Q. From the time that you left - okay. - till
25 the time that you left with Chris Tucker on the
26 plane to Miami, did you have any contact with your
27 father.
28 A. Yes. 660

1 Q. On how many occasions.
2 A. Once or twice.
3 Q. I'm sorry.
4 A. Once or twice.
5 Q. Was there on one occasion that led to a

6 situation where you ended up talking to law
7 enforcement authorities.
8 A. Yes.
9 Q. And you ended up having to go to court.
10 A. Yes.
11 Q. And testify against your father.
12 A. Yes.
13 Q. And you were the victim.
14 A. Yes.
15 Q. Since the time that that occurred until you
16 left to Miami, have you ever seen your father, had
17 any contact with him.
18 A. No. Not personally.
19 THE COURT: Counsel, I'm sorry to interrupt
20 you, but my feed isn't working here.
21 (Brief interruption.)
22 Q. BY MR. SNEDDON: Just moving to another
23 event now, and just going back and filling in some
24 details I left out while you and I were talking
25 earlier this morning, you recall earlier that you
26 testified that there was a point where some media
27 people came to your door at your apartment.
28 A. Yes. 661

1 Q. Do you recall that.
2 A. Yes.
3 Q. Do you remember how -- how that -- how many
4 days that was before you left for Miami.
5 A. A couple of days before.
6 Q. I'm sorry, I couldn't hear the answer.
7 A. A couple days before.
8 Q. Did it happen on more than one occasion.
9 A. My grandma had called us and said there was
10 media at her house, but other -- to the apartment,
11 no.
12 Q. Now, one last thing, and then we'll get back
13 on the plane there in Miami.
14 Your senior year in high school, where did
15 you go to high school.
16 A. Mountain View High School.
17 Q. What community is Mountain View High School
18 located.
19 A. In El Monte.
20 Q. Where did you live while you were going to
21 Mountain View High School.
22 A. With my grandmother.
23 Q. And they live in where.
24 A. El Monte.
25 Q. Now, after you graduated from high school,
26 where did you -- where did you live. With your
27 grandparents or somebody else.
28 A. We went back to live with my parents. 662

1 Q. With your parents meaning.
2 A. Jay Jackson and my mom.
3 Q. Have you lived there continuously since that
4 time.
5 A. Yes.
6 Q. How would you describe your relationship
7 with your stepfather.
8 A. Very nice relationship. Very, very loving.
9 I love him a lot.
10 THE COURT: Mr. Sneddon. This is a good
11 place to interrupt.
12 I'm not sure if it's catching up. It's
13 going back through the -- this morning.
14 THE REPORTER: It will eventually catch up.
15 MR. SANGER: It's doing the same for us, if
16 that's of any consolation.
17 MR. ZONEN: Us too.
18 THE COURT: That's no consolation.
19 I'd like to wait a minute, if we could, so
20 we catch up.
21 (Brief interruption.)
22 THE COURT: All right. I think we can go
23 forward now.
24 MR. SNEDDON: Thank you, Your Honor.
25 Q. Okay. We're going to go back now and we're
26 going to start talking about the part of Miami where
27 you're flying, you're getting on a plane in Miami.
28 Okay. 663

1 A. All right.
2 Q. Now, you told us who was on the plane
3 before.
4 A. Yes.
5 Q. Now, I want to ask you something. Was there
6 an incident that occurred before you guys got on the
7 plane.
8 A. Like -- incident how.
9 Q. Was your mother on the plane.
10 A. Yes.
11 Q. And was your mother supposed to be on the
12 plane.
13 A. No.
14 Q. Okay. What happened.
15 A. They didn't want my mom to go on the flight,
16 on the same flight that we were on.
17 MR. MESEREAU: Objection; hearsay.
18 THE COURT: Sustained.
19 Q. BY MR. SNEDDON: Were you present when your
20 mom was having a discussion about who was going to

21 go on the plane.
22 A. Yeah, she was on the phone.
23 Q. She was on the phone.
24 A. Yeah.
25 Q. And who else was present.
26 A. I think my brothers were. But it was in our
27 room, but it's when we were getting ready to leave.
28 Q. Do you know who she was on the phone with. 664

1 A. Probably --
2 Q. To your knowledge, without --
3 MR. MESEREAU: Objection.
4 Q. BY MR. SNEDDON: Not something that somebody
5 told you, but to your knowledge.
6 A. I don't know.
7 Q. And how long did that discussion take.
8 A. They were on the phone for like ten minutes.
9 Q. And at the end of that conversation, did
10 your mom get on the plane with you.
11 A. Yes.
12 Q. Was -- were any people identified to you as
13 security guards on that plane when it left.
14 A. When it left, there was no security guards
15 on the plane.
16 Q. On the plane -- where -- let's just do it
17 this way: You're on the plane. Where are you
18 seated on the plane in relationship to your brother
19 Gavin.
20 A. Right across from him.
21 Q. And who's sitting next to you, if anyone.
22 A. Paris is.
23 Q. Paris.
24 A. Yes.
25 Q. And with regard to the defendant in this
26 case, Mr. Jackson, where is he.
27 A. He's sitting next to Gavin.
28 Q. And is there anything in between you and 665

1 Paris and Gavin and the defendant.
2 A. We were sitting at, like, a dining room --
3 like a little table. There were, like, cupholders
4 and stuff.
5 Q. Now, during the flight, during this flight,
6 did you at any time see Gavin drinking anything.
7 A. He had a Diet Coke can.
8 Q. Do you know where he got it from.
9 A. Mr. Jackson passed it to him.
10 Q. Did you see him actually drink from the can.
11 A. Yes.
12 Q. Do you remember on how many occasions.

13 A. They were sipping it back and forth.
14 Q. Now, when they were sipping this -- what
15 kind of a can was it.
16 A. A Diet Coke can.
17 Q. When they were sipping this Diet Coke can,
18 passing it back and forth, was there anything else
19 going on between your brother Gavin and the
20 defendant in this case, Mr. Jackson.
21 MR. MESEREAU: Objection; vague.
22 THE COURT: Overruled.
23 THE WITNESS: They were whispering.
24 Q. BY MR. SNEDDON: I'm sorry.
25 A. They were whispering back and forth.
26 Q. At any time during the time that they were
27 whispering back and forth, did you see Mr. Jackson
28 do anything. 666

1 A. He would pass the Diet Coke, they would
2 whisper, and then at one point Mr. Jackson took off
3 his watch and gave it to Gavin.
4 Q. Did you see Mr. Jackson do that.
5 A. Yes.
6 Q. Can you tell the ladies and gentlemen of the
7 jury, when he took the watch off and gave it to
8 Gavin, whether he said anything to him at that time.
9 A. He was whispering in his ear and then Gavin
10 put it on.
11 Q. During the course of this flight, did you
12 see Mr. Jackson give Gavin anything else.
13 A. Yes.
14 Q. What.
15 A. The jacket he had on.
16 Q. Can you describe the jacket.
17 A. It's black and it's sparkly on the back.
18 Q. Now, do you recall how long the plane ride
19 took from, say, Miami to where you eventually
20 landed.
21 A. Six, seven hours.
22 Q. Did you -- were you awake during the whole
23 trip.
24 A. No, I fell asleep at one point.
25 Q. Now, your brother Star was on the plane; is
26 that correct.
27 A. Yes.
28 Q. And where was your brother Star located on 667

1 the plane.
2 A. There was a bench behind Mr. Jackson and
3 Gavin. I'm -- not exactly behind, but like to the
4 back, my left-hand side, there was a bench. And he

5 would go from right there into a chair that was
6 right in front of them. He would go back and forth.
7 Q. So this was a plane you could get up and
8 move around on.
9 A. Yes.
10 Q. Where was your mom.
11 A. My mom was sitting behind me in one of the
12 four chairs that's behind us.
13 Q. During the time that you were on this plane,
14 did you see whether or not the plane had any kind of
15 a telephone on it.
16 A. Yes.
17 Q. Where was the telephone located.
18 A. Right on my right-hand side, on the wall.
19 Q. And during the time of this ride on the
20 plane, did you see -- can you tell us whether or not
21 that telephone was ever used.
22 A. I saw Gavin use it once. He was calling one
23 of his friends.
24 Q. All right. Did you see that on any other
25 occasions.
26 A. No.
27 MR. SNEDDON: Excuse me just a moment, Your
28 Honor. 668

1 I have an exhibit. This will be 339, I
2 believe, for identification purposes.
3 (Off-the-record discussion held at counsel
4 table.)
5 Q. BY MR. SNEDDON: All right. I'm going to
6 hand you People's Exhibit No. 339 and ask you if you
7 recognize that.
8 A. Yes.
9 Q. Can you tell the ladies and gentlemen of the
10 jury what that is.
11 A. The -- how -- the plane, the private jet.
12 Q. Is that the interior.
13 A. Yes.
14 Q. All right. I'm going to hand you this pen.
15 And just hang on to that for a second.
16 Does that diagram accurately represent the
17 interior of the plane as you recall it.
18 A. Yes.
19 MR. SNEDDON: I move that it be admitted
20 into evidence, Your Honor.
21 MR. MESEREAU: I'm sorry, Your Honor. I
22 didn't hear.
23 THE COURT: It's okay. He moved that exhibit
24 into evidence. She identified it.
25 MR. MESEREAU: There's still a foundational
26 problem, Your Honor, as to whether that is actually
27 an accurate depiction of the interior of that plane.

28 I don't think the foundation has been laid. 669

1 THE COURT: I'll admit it. I think that's a
2 subject of cross-examination.

3 MR. MESEREAU: Okay.

4 MR. SNEDDON: All right. We're going to
5 display something up on the Elmo, Your Honor. And
6 what we're going to display is 339.

7 Q. Now, you have the exhibit in front of you,
8 okay.

9 What I want you to do is, I want you to take
10 a felt tip pen, if you would, and I want you to put
11 your initials in the seat in which you were located.
12 Well, first of all, let me do this. Take
13 that light, the black thing with the light, okay,
14 and show the ladies and gentlemen of the jury where
15 you were seated.

16 A. Right there.

17 Q. All right. And where was your brother
18 Gavin.

19 A. Right there.

20 Q. And where was the defendant.

21 A. Right here.

22 Q. And where was Paris.

23 A. Right here.

24 Q. Okay. Now, what I want you to do is on the
25 exhibit that you have in front of you, I want you to
26 take that red pen I gave you, and I want you to put
27 your initials in your seat.

28 Okay. What did you put. 670

1 A. "DA."

2 Q. That figures.

3 Now, would you please put the initials for
4 your brother in the seat that he was in on
5 Exhibit 339.

6 And then put just like an "MJ" for where
7 Mr. Jackson was sitting.

8 And a "PJ" for where Paris was sitting.

9 Now, would you show the ladies and gentlemen
10 of the jury with the light again, if you would,
11 where your mother was sitting on the plane.

12 A. She was sitting in one of these four seats.

13 Q. So you're not sure which one of those four.

14 A. I don't remember.

15 Q. So why don't you just put your mother's
16 initials right in the middle on the diagram. And
17 you put a what.

18 A. "JJ." "JJ."

19 Q. "JJ".

20 A. Yeah, that's my mom's initials.
21 Q. Oh, Janet Jackson. You threw me for a
22 second. Way ahead of me.
23 All right. Now, your brother Star, when the
24 plane took off, do you recall where he was.
25 A. Yes.
26 Q. Would you show the ladies and gentlemen of
27 the jury.
28 A. He was either sitting right here or he would 671

1 go to this seat.
2 Q. So he moved back and forth between those
3 seats.
4 All right. The two seats that you said he
5 moved back and forth between, would you put his
6 initials in those seats on the Exhibit 339. Would
7 you put them in both of them.
8 Now, I want to direct your attention to
9 where you believed that you saw the telephone.
10 Okay.
11 A. Okay.
12 Q. Would you point that out to the jury.
13 A. Right here.
14 Q. Okay. And would you put -- you can put --
15 on the white area, put "TFC," and then the arrow to
16 where it was located on the exhibit. Would you do
17 that. Good. Thank you.
18 Now, on the exhibit that looks like a blue
19 series of chairs, do you see that.
20 A. Yes.
21 Q. What is that.
22 A. That's like a couch.
23 Q. And you told us that one of those seats was
24 occupied from time to time by your brother Star.
25 A. Yes.
26 Q. Who, if anyone, occupied the other seat.
27 A. Aldo and Marie Nicole were sitting in that
28 area, too. 672

1 Q. Do you remember which seats they were in.
2 A. No, they would switch around.
3 Q. Why don't you just go ahead and put their
4 initials, just Aldo and Marie Nicole, in those two
5 seats, just -- and an arrow back and forth. How's
6 that. Okay.
7 Now, you told us -- who else was on the
8 plane.
9 A. Mr. Jackson's doctor and the two nannies.
10 Q. Do you know the doctor's name.
11 A. No.

12 Q. Do you know where he was seated.
13 A. He was in one of the four chairs.
14 Q. Show us.
15 A. In one of these chairs.
16 Q. Okay. Who else was up in that four-chair
17 area besides your mother and this doctor.
18 A. The two nannies.
19 Q. Okay. So why don't you just put "Doctor,"
20 just put a "DR," just -- and "2-nannies."
21 Okay. Now, if we could just move the
22 exhibit a little bit farther to the right, so it
23 shows all the way to the front, or all the way to
24 the end.
25 Okay. Now, from this particular exhibit,
26 339, the one that's in front of you, looking at the
27 far left-hand part of the exhibit that's on the
28 board above you, do you see that. What end of the 673

1 plane is that.
2 A. This is the back of the plane.
3 Q. Okay. Could you just write in the white
4 space above it "back" and put an arrow down to that.
5 Can you tell us, what are the areas depicted
6 in this particular part of Exhibit 339.
7 A. This is the bathroom. There was an area
8 back -- I don't know. It was an area back here
9 where the flight attendant would make the food and
10 stuff.
11 Q. Okay.
12 A. And then the luggage is way in the back.
13 Q. Okay. So show us the bathroom again.
14 A. Right here.
15 Q. Okay. So that little white box that's on
16 the screen there, do you see the little white box.
17 Is that part of the bathroom, on the lower part.
18 A. Yeah.
19 Q. Why don't you write "BR" in there.
20 Okay. We're going to slide the Exhibit 339
21 all the way to the other end. Okay.
22 So I take it that would be the front part of
23 the plane.
24 A. Yes.
25 Q. So could we just write "front" on there, if
26 you would.
27 Do you remember where the door to the plane
28 is where you got on. 674

1 A. It's right there.
2 Q. Okay. Do you want to write "door" in that
3 space.

4 All right. I think we're done with that
5 exhibit. Thank you.
6 May I have a moment, Your Honor. We can
7 turn the lights back on.
8 All right. Now, that exhibit that you put
9 in front of you, that's 339, the plane.
10 A. Yes.
11 Q. Would you please just write your name on it.
12 Because we're going to have several of those, and we
13 want to make sure that we have your name on it.
14 Thank you. Now, one other thing that I
15 think that I probably forgot to ask you that needs
16 to be asked: You told the ladies and gentlemen of
17 the jury that your brother had been diagnosed with
18 cancer.
19 A. Yes.
20 Q. And that he had had a battle with cancer,
21 and had been going to the hospital and out of the
22 hospital from time to time.
23 A. Yes.
24 Q. How long was it before -- how long did it
25 last. How long did that illness last.
26 A. A year.
27 Q. And what happened at the end of the year.
28 A. He was in remission. There was no more -- 675

1 they couldn't find no more cancer cells.
2 Q. So it was a year from when it first happened
3 to when it went into remission.
4 A. Yes.
5 Q. Can you peg that for us in terms of where
6 you were in your schooling when he actually went
7 into remission.
8 A. My sophomore year.
9 Q. Was your father still in the house at the
10 time that he -- that Gavin -- Gavin went into
11 remission.
12 A. No.
13 Q. He was already gone.
14 A. Yes. He had left the month before.
15 Q. I'm sorry.
16 A. He had left the month before.
17 Q. Okay. Let's move back to where we were
18 chronologically. And we're talking about on the
19 plane coming from Miami.
20 Now, when the plane landed, did you know
21 where you were.
22 A. We were back in -- near the Neverland Ranch.
23 Q. And when you got off the plane, where did
24 you go.
25 A. We got picked up in a limo and we got took
26 to the ranch.

27 Q. Now, could you tell us, when you got off the
28 plane and you got into the limo, was it night or 676

1 day.

2 A. It was night.

3 Q. Do you remember about what time it was.

4 A. No. It was just pitch black.

5 Q. So you got into the limo. And were there
6 any stops between the airport and the ranch, to your
7 knowledge.

8 A. No. No.

9 Q. And when you got to the ranch, where did you
10 go.

11 A. I went to the guest room.

12 Q. Was it the same one you were in before or a
13 different one.

14 A. It was the same one.

15 Q. And do you know -- did you go in your mom's
16 room, wherever your mom was staying.

17 A. Not that night. Just to say goodnight, but
18 not to stay there.

19 Q. So you went in there to say goodnight.

20 A. Yeah.

21 Q. Where was she staying.

22 A. She was staying next to me.

23 Q. Okay. In the guest quarters.

24 A. Yes.

25 Q. Now, with regard to your brothers, did you
26 see where they went when you got back to the ranch
27 and got out of the limo.

28 A. I just seen -- I saw them run off with Mr. 677

1 Jackson.

2 Q. I couldn't hear you.

3 A. I just saw them run off with Mr. Jackson.

4 Q. Did you see in what direction they took off.

5 A. Towards the main house.

6 Q. Did you -- how far did you see them go
7 before you went and did something else.

8 A. I just saw them go into the main house.

9 Q. So you actually saw them go into the house.

10 A. Yeah.

11 Q. Did you see them at all the rest of that
12 night.

13 A. No.

14 Q. Now, while you were at the ranch now, had
15 you missed school.

16 A. No, because I was off track at that time.

17 Q. What does that mean.

18 A. I go to -- at that time I was on a

19 year-round school. So I would go to school for
20 three months; get three months off; and go to school
21 for three months.

22 Q. Now, you told us that when you were -- when
23 you heard about the trip to Miami, you called your
24 mom on a pay phone.

25 A. Yeah, it was like a couple days before the
26 vacation.

27 Q. But were you in school at that time.

28 A. I was in summer -- in like -- they have two 678

1 intersessions. One like summer school, but they had
2 it during the winter.

3 Q. Okay.

4 A. And I think I was -- I had some classes.

5 That's why I was at school.

6 Q. Okay. And were your brothers, to your
7 knowledge, in school.

8 A. I think they were.

9 Q. Do you remember which school they were going
10 to at this time. By "this time," I mean when you're
11 at Neverland Valley Ranch after you've come back
12 from Miami.

13 A. I think they were in Hollenbeck. But I
14 couldn't remember. I don't remember really.

15 Q. Okay. At any time after you arrived back at
16 the ranch that night, did the person you described
17 previously as Dieter, the one you met in Miami at
18 the hotel --

19 A. Yes.

20 Q. -- did you ever see him on the ranch.

21 A. Later on.

22 Q. Okay. How many days later was it.

23 A. I think it was the next day or the following
24 day.

25 Q. Did you ever see the person that you named
26 as Ronald and identified in the photograph, did you
27 see that person come to the ranch.

28 A. Yes. 679

1 Q. Do you remember when that was.

2 A. Around the same time as Dieter.

3 Q. And during the time that you got to the
4 ranch, and when these two individuals arrived at the
5 ranch, did you know whether or not they were staying
6 at the ranch.

7 A. Yeah. I think so. Because they were there
8 all day from -- I'd see them.

9 Q. When you saw them, can you tell us whether
10 or not you ever saw them with Mr. Jackson.

11 A. Yes.
12 Q. On how many occasions during those first
13 days.
14 A. Well, anytime I'd really come into the main
15 house --
16 Q. You have to speak up.
17 A. Anytime I really, like, passed by the main
18 house, I would see them occasionally talking with
19 each other. But I really don't remember.
20 Q. Okay.
21 A. It was a couple of times.
22 Q. Did you ever see them meeting and talking in
23 any other places on the location there.
24 A. No, not that I remember.
25 Q. Okay.
26 A. Like later on they would meet in the guest
27 quarters, but -- like Mr. Jackson and Ronald. But
28 not at the beginning. 680

1 Q. I couldn't hear that.
2 A. Like later on --
3 Q. Okay.
4 A. -- like Mr. Jackson and Ronald would meet in
5 the guest quarters. But other than that, no.
6 Q. Okay. That was later on, though.
7 A. Yes.
8 Q. Now, did you personally have any contact
9 with the people -- let's say Dieter first. Let's
10 start with the person you described as Dieter. Did
11 you ever have any conversations with him.
12 A. Couple times.
13 Q. What were the subjects of the conversations.
14 A. On the rebuttal film and us going to Brazil.
15 Q. All right. Let's talk about the rebuttal
16 film, all right. What did Dieter tell you about the
17 rebuttal film. And first of all, let's go back.
18 Where did -- excuse me.
19 Where did that conversation take place.
20 A. There was one conversation in one of the
21 guest quarters with me and my mom and my brothers.
22 Q. All right. Anybody else present.
23 A. No, it was just Dieter and us.
24 Q. And how many days do you think it was that
25 you'd been there before that conversation occurred.
26 A. Less than a week. Three days, four days.
27 Q. And what was the subject matter of the
28 conversation. 681

1 MR. MESEREAU: Objection; hearsay.
2 MR. SNEDDON: It's offered under 223.

3 THE COURT: I'll accept it conditionally.
4 Excuse me. I'll accept the testimony conditionally
5 under the instructions I gave you earlier.
6 Q. BY MR. SNEDDON: Go ahead.
7 A. It was about the watch.
8 Q. All right. What about the watch.
9 A. He wanted it back.
10 Q. Who wanted it back.
11 A. Dieter wanted it back from Gavin.
12 Q. And what was said.
13 A. That he wanted it back; that he could put it
14 in a safe and take care of it for him and he might
15 lose it, and he just wanted it back.
16 Q. All right. And did he get it back.
17 A. No.
18 Q. Why.
19 A. Gavin didn't want to give it to him.
20 Q. What was your mother's attitude towards
21 that.
22 A. Just -- she didn't see no point in it. She
23 just -- whatever Gavin wanted.
24 Q. Now -- I got it. It's all right.
25 Now, you told us that the other
26 conversations that you had with this gentleman
27 Dieter involved the rebuttal film.
28 A. Yes. 682

1 Q. Okay. Now, when you talk about a rebuttal
2 film, what do you mean by that.
3 A. They said they wanted to do another video,
4 and they wanted it to just be of us.
5 Q. Who's "they".
6 A. Dieter and Frank talked about it.
7 Q. Now, when -- let's talk about Dieter first
8 of all, okay. When did you have a conversation with
9 Dieter about this rebuttal film.
10 A. I think it was in -- near, like, the kitchen
11 area. In that area. Like in the sitting area.
12 Q. Okay. And do you recall how long you'd been
13 at the ranch before -- when that conversation took
14 place.
15 A. It was after the watch incident, so five
16 days or so. I think.
17 Q. What did he say about -- what did he say to
18 you about the rebuttal.
19 MR. MESEREAU: Objection; hearsay.
20 MR. SNEDDON: Offered for the same purpose,
21 Your Honor.
22 THE COURT: All right. I'll accept it
23 conditionally.
24 Q. BY MR. SNEDDON: Go ahead.
25 A. It was just -- we were supposed to say nice

26 things about him and just -- and he offered us -- to
27 give us a paper.
28 Q. A paper. What do you mean by "a paper". 683

1 A. It was kind of like a script, just of things
2 to say.

3 Q. Did you read it.

4 A. Yeah.

5 Q. Do you remember what was on it.

6 A. Just nice things of Mr. Jackson, and that's
7 it.

8 Q. Now, at some point in time after you arrived
9 at the ranch from Miami, and you're on the ranch,
10 okay --

11 A. Yes.

12 Q. -- did you leave.

13 A. From --

14 Q. From Neverland. I'm not asking you how
15 long. I'm just asking did you leave.

16 A. We left at -- just to do the rebuttal.

17 Q. Okay.

18 A. And there was -- that's all I remember,
19 yeah.

20 Q. Do you remember meeting a man at the ranch
21 by the name of Jesus.

22 A. Yes.

23 Q. Okay. Who is Jesus.

24 A. He's one of the security guards there or
25 just one of the head people around the ranch.

26 Q. And did you ever leave the ranch with Jesus.

27 A. Yeah. Now I remember, yeah.

28 Q. Do you recall with regard to that particular 684

1 incident -- between the time that you arrived at the
2 ranch at Neverland and the time that you left with
3 Jesus, okay. We're talking about that time.

4 A. (Nods head up and down.)

5 Q. Where did your mother stay on the ranch.

6 A. She stood in the guest quarters.

7 Q. And could you tell us, under your personal
8 observations and opinion, did your mother come out
9 of the room very often.

10 A. Never.

11 Q. Why.

12 A. She just never came out, and then --

13 MR. MESEREAU: Objection. Calls for
14 speculation; hearsay. And no foundation.

15 MR. SNEDDON: Let me see if I can go back
16 and cure it a little bit, Judge. I think I can do
17 that without any problem.

18 THE COURT: All right.
19 Q. BY MR. SNEDDON: Okay. During the time that
20 you got from Miami and you got to the ranch --
21 A. Yes.
22 Q. -- to the time that you left with Jesus,
23 okay --
24 A. Yes.
25 Q. -- where were your brothers.
26 A. They were running around with Mr. Jackson.
27 Q. Did you see much of them.
28 A. Not really. 685

1 Q. So the only person that you know on the
2 ranch was your mother.
3 A. Yes.
4 Q. And did you spend time with your mother.
5 A. Yes.
6 Q. And where did you spend time with your
7 mother.
8 A. In her room.
9 Q. And your room was next door to your mother's
10 room.
11 A. Yes.
12 Q. So, do you have an opinion with regard to
13 how much your mother came out of her room.
14 A. Hardly never. Not really at all.
15 Q. During the time that you were there from --
16 you got back from Miami and before you left with
17 Jesus - okay. - how long was that; do you recall.
18 A. I'm sorry, repeat the question. I was
19 thinking about me and my mom in the room.
20 Q. Did I forget to ask you something about you
21 and your mom.
22 A. No, just thinking about the whole situation.
23 Can you repeat the question.
24 Q. Sure. From the time you arrived at the
25 ranch till the time you left with Jesus, okay, how
26 many days do you think that was.
27 A. I don't remember. Close to a week or less.
28 I don't remember. 686

1 Q. Okay.
2 A. It had been a while, though.
3 Q. Now, had -- can you describe your mother's
4 demeanor and attitude during the time that she was
5 at the ranch between the time you got there and the
6 time you left with Jesus.
7 A. She seemed kind of worried and just didn't
8 really understand the whole situation, what was
9 really going on. And she was kind of scared.

10 Q. Now, when -- when you left with Jesus, do
11 you remember what time of the night or day it was
12 that you left.
13 A. It was night.
14 Q. How do you know that.
15 A. Because it was really dark out.
16 Q. And do you remember the circumstances under
17 which you left.
18 A. Yeah, we were scared and we just --
19 MR. MESEREAU: Objection. Hearsay;
20 foundation; calls for speculation.
21 THE COURT: Overruled.
22 Q. BY MR. SNEDDON: Go ahead.
23 A. We were kind of scared and we just really
24 didn't -- the way the conversations with Dieter
25 went, they were real aggressive and just -- we were
26 scared, so -- of course Gavin didn't want to leave.
27 But my mom and me, mainly my mom wanted to get us
28 out of there. 687

1 Q. All right. And then do you recall how Mr.
2 Salas -- I'm sorry, how Jesus got involved in this.
3 A. My mom asked him to take us to home.
4 Q. Were you present when she did that.
5 A. Not that I remember.
6 Q. So at some point you were told what, by your
7 mom.
8 A. By my mom, that we were leaving.
9 Q. And you gathered up your stuff, I take it.
10 A. Some little things. Not really. We just
11 really wanted to get out of there.
12 Q. And then what did you do.
13 A. We left.
14 Q. And who went.
15 A. Jesus, me, my brothers and my mom.
16 Q. Now, I don't want you to speak for anybody
17 else, okay. I want you to speak for yourself. Why
18 was it that you felt that you were scared.
19 A. Just the whole situation. The whole
20 secrecy. The -- just real aggressive. I was just
21 scared. I didn't understand what was going on and
22 why it was like this. I was just scared.
23 Q. Did you -- during this time, when you first
24 got to the ranch and before you left with Jesus, did
25 you have any interaction with the defendant in this
26 case, Mr. Jackson.
27 A. Just little interaction, yeah.
28 Q. All right. And can you describe that. 688

1 A. Hi; a hug; there would be times where I'd

2 walk in where Mr. Jackson and the boys and Aldo
3 would be and just say hi and stuff like that. But I
4 would leave immediately.
5 Q. Why.
6 A. Because they would tell me, "Oh, don't you
7 want to go do that." And just felt uncomfortable,
8 like if they didn't want me there.
9 Q. So, just to fill in the rest of it for the
10 jury, the people that you've identified in those
11 photographs as Aldo and Marie Nicole, did they go to
12 the ranch at the same time that you folks did. From
13 the limo, from the plane, to the ranch.
14 A. Yes.
15 Q. And they were there.
16 A. Yes.
17 Q. And do you know where Marie Nicole was
18 staying.
19 A. She stood in the main house.
20 Q. And how do you know that.
21 A. Because we would talk and stuff. And then I
22 stood in the room with her at one time, just sitting
23 and talking.
24 Q. To your knowledge, at any time did the boys
25 come back and stay in the guest cottage.
26 A. One time Star did.
27 Q. Between the time that you arrived from Miami
28 till the time you left with Jesus, did the boys come 689

1 back and stay in the guest cottage.
2 MR. MESEREAU: Objection; foundation.
3 THE COURT: Sustained.
4 Q. BY MR. SNEDDON: To your knowledge, based
5 upon what you saw and observed, did you ever see the
6 boys stay the night in the guest cottage before you
7 left with Jesus.
8 MR. MESEREAU: Same objection; foundation.
9 THE COURT: Overruled.
10 You may answer.
11 THE WITNESS: Um, I think that was after,
12 after we came back.
13 Q. BY MR. SNEDDON: What was after.
14 A. The incident with Star coming to sleep in
15 the room. It was after we had come back.
16 Q. Come back from.
17 A. I don't know where it was placed. All I
18 know, there was one incident Star came and slept
19 with me in the room.
20 Q. Okay. So there was one time.
21 A. Yeah.
22 Q. All right. Can you tell us whether or not,
23 from your own personal observation -- strike that.
24 Did you see your mother interact with Dieter

25 and Ronald.
26 A. There was one incidence I saw him coming out
27 of my mom's room, but -- I don't remember. She
28 would tell me -- 690

1 Q. Don't tell us what she said.
2 A. Okay.
3 Q. It's not your fault.
4 A. From what I saw, no.
5 Q. You weren't present during those
6 conversations.
7 A. No.
8 Q. But there were occasions when you saw Dieter
9 and Ronald coming out of your mom's room.
10 A. Yeah.
11 Q. Did you go into -- don't tell us what she
12 said. But after that, did you go in to see her
13 right away.
14 A. Yeah.
15 Q. Could you tell us whether or not she was
16 upset.
17 A. Yes. She seemed upset.
18 MR. MESEREAU: Objection.
19 I'll withdraw the objection.
20 Q. BY MR. SNEDDON: Now, when you left with
21 Jesus, do you remember where you were taken.
22 A. Yes.
23 Q. Where were you taken.
24 A. To my grandmother's house.
25 Q. And was your grandmother still living in El
26 Monte.
27 A. Yes.
28 Q. Now, after -- I'm sorry. Now, after you got 691

1 to -- got to El Monte, do you remember what time it
2 was.
3 A. It was night.
4 Q. Still night.
5 A. Uh-huh.
6 Q. So that night, did you spend the night there
7 with your grandparents.
8 A. Yes.
9 Q. At this point, was -- to your knowledge, was
10 your mother still seeing Major Jackson.
11 A. Yes.
12 Q. And, in fact -- let me put it this way: At
13 the point before you left for Miami, okay, for the
14 trip to Miami, was she still seeing Major Jackson.
15 A. Yes.
16 Q. At that point in time, was your mother

17 staying at the Soto Street address or with Major
18 Jackson.
19 A. Um --
20 Q. If you know.
21 A. At the very beginning we were still staying
22 at the Soto apartment.
23 Q. Okay.
24 A. And then would go sleep over at his house,
25 but we were still living at the Soto apartment.
26 Q. When you got back from Neverland Ranch,
27 you're back at your grandparents' place, all right.
28 Now, did you remain at your grandparents' or did you 692

1 go somewhere else.
2 A. We went to Jay Jackson's house.
3 Q. And do you remember how many days you were
4 there.
5 A. We didn't sleep over that night.
6 Q. How about the next night.
7 A. I think that's the day that the ladies came
8 over from -- the social workers.
9 Q. Do you ever remember --
10 MR. MESEREAU: Excuse me.
11 THE COURT: She's not speaking loud enough.
12 You need to speak up.
13 MR. SNEDDON: Okay.
14 THE COURT: Would you like the answer read
15 back.
16 MR. MESEREAU: Yes, please, Your Honor.
17 Thank you.
18 THE COURT: Please.
19 (Record read.)
20 Q. BY MR. SNEDDON: Okay. Do you remember an
21 incident at Jay Jackson's apartment where a private
22 investigator came to the apartment.
23 A. Yes.
24 Q. Was that before or after the time you went
25 to talk to the social workers.
26 A. This was before.
27 Q. Was it before -- well, was it after you left
28 the ranch with Mr. Jesus. 693

1 A. I think it was after. I don't remember.
2 Q. Do you remember what day of the week it was.
3 A. No.
4 Q. Okay. Describe the meeting to us, if you
5 would.
6 A. Mr. Miller came in and --
7 Q. You knew his name.
8 A. Yes.

9 Q. Okay. What was it.
10 A. Mr. Bradley Miller.
11 Q. Okay. Go ahead.
12 A. Mr. Miller -- we all sat on the -- Jay's
13 couch, and -- me and my mom and my brothers and Jay
14 and Mr. Miller. And Mr. Miller just told us to say
15 what we thought about our father and say how we felt
16 about Mr. Jackson.
17 Q. Did -- did you remain during the entire time
18 that Mr. Miller was there.
19 A. Yes.
20 Q. To your knowledge, did you ever see a
21 tape-recorder.
22 A. Yes.
23 Q. Where was the tape-recorder.
24 A. It was placed on the glass table.
25 Q. Whose tape-recorder was that.
26 A. That was Mr. Miller's.
27 Q. And during the course of the conversations
28 between you and Mr. Miller, did he ever turn it off. 694

1 A. Yes.
2 Q. Do you remember how many times he did that.
3 A. It was several times. But he would turn it
4 off and say "Um, that's not necessary. You don't
5 need to talk about that. Let's start over. I want
6 to talk about this now," and he would restart the
7 tape.
8 MR. MESEREAU: Objection.
9 THE COURT: Just a moment. Overruled.
10 Go ahead. Overruled.
11 Q. BY MR. SNEDDON: Okay. Go ahead.
12 A. He would start to rewind it and say,
13 "That's" -- "You don't need to say that."
14 Q. Do you remember how long the conversation
15 with Mr. Miller lasted.
16 A. Half an hour, I think.
17 Q. Now, at some point after this tape-recorded
18 conversation with this person you knew as
19 Mr. Miller -- okay. -- did you go back to the ranch.
20 A. Yes.
21 Q. And who did you go back to the ranch with.
22 A. My brothers and my mom.
23 Q. And how did you get back to the ranch.
24 A. Someone came and picked us up.
25 Q. Now, do you remember the name of the person
26 who picked you up.
27 A. I don't remember who it was.
28 Q. When you were picked up, do you remember 695

1 where you were when you got picked up.
2 A. At Jay's apartment.
3 Q. You're going to have to speak up.
4 A. At Jay's apartment.
5 Q. That's great. Just keep it right like that.
6 Okay. At Jay's apartment. And where did
7 you go.
8 A. To Neverland Ranch.
9 Q. Were there any stops made between the point
10 you left Major Jackson's place and you got to the
11 ranch, to your knowledge or recollection.
12 A. I think there was a point that we stopped
13 at Jamie's, The Laugh Factory.
14 Q. You have to --
15 A. I think that was the point that we stopped
16 at The Laugh Factory.
17 Q. You remember there was an incident that you
18 stopped at The Laugh Factory.
19 A. Yeah.
20 Q. Okay. You got back to the ranch at some
21 point, correct.
22 A. Yeah.
23 Q. And when you got back to the ranch, did you
24 see anybody at the ranch that you recognized that
25 had been there before, when you first got there.
26 A. Frank was there. And I met Vinnie.
27 Q. Can you tell us whether or not Dieter was
28 there. 696

1 A. I don't think he was. I don't remember.
2 Q. When you guys got back to the ranch on this
3 occasion, did your mother stay with you.
4 A. I think she did. I'm trying to place where
5 I was at.
6 Q. All right. Take a second and place it,
7 okay.
8 A. Okay.
9 I think so.
10 (Off-the-record discussion held at counsel
11 table.)
12 MR. SNEDDON: Excuse me just a second, Your
13 Honor. It will take me just a second, Your Honor.
14 Q. Let me ask you something else while I'm
15 looking for this. Let's go back just a moment in
16 time.
17 At the time you were at the ranch before you
18 left with Mr. Salas, with Jose -- Jesus, did you
19 hear anybody threaten you or any member of your
20 family.
21 MR. MESEREAU: Objection; leading.
22 THE COURT: Sustained.
23 THE WITNESS: Um --

24 THE COURT: Just a moment. He'll have to ask
25 you another question.
26 THE WITNESS: Oh.
27 Q. BY MR. SNEDDON: Well, can you tell us
28 whether or not you personally ever received any 697

1 comments from somebody that scared you.
2 MR. MESEREAU: Objection; leading.
3 MR. SNEDDON: It's not a leading question.
4 It's an open-ended question.
5 THE COURT: All right. Overruled.
6 THE WITNESS: There was one point that Frank
7 had told us that there was death threats on us.
8 Q. BY MR. SNEDDON: All right. Okay. Do you
9 remember a point in time where you -- let me ask
10 this question: Have you ever been to the residence
11 of Hamid Moslehi.
12 A. Yes.
13 Q. And what was going on when you went to his
14 house. Why did you go there.
15 A. That's where we did the rebuttal at.
16 Q. And where had you been prior to going to his
17 house.
18 A. The ranch.
19 Q. And who was at the ranch at that time.
20 A. Frank -- no, Frank wasn't there. Vinnie
21 was --
22 Q. Let me ask it this way: How did you get
23 from the ranch to his house.
24 A. Hamid came and picked us up.
25 Q. Who did.
26 A. Hamid.
27 Q. Who was in the car with you.
28 A. Me, my mom and my brothers. 698

1 Q. Okay. And you went to where.
2 A. To his house.
3 Q. Okay. And what was the -- what was the --
4 why were you there.
5 A. To do the rebuttal film.
6 Q. Now, before you left the ranch that
7 particular night, did you have a conversation with
8 anybody about the film.
9 A. Yes.
10 Q. And who was that.
11 A. Dieter.
12 Q. And what did Dieter tell you.
13 A. To say nice things.
14 MR. MESEREAU: Objection; hearsay.
15 MR. SNEDDON: Same purpose, Your Honor.

16 THE COURT: Overruled.
17 THE WITNESS: To say nice things and to not
18 talk about what goes on around the ranch.
19 Q. BY MR. SNEDDON: I'm sorry.
20 A. What goes on in the ranch.
21 Q. I didn't hear you. You're going to have to
22 lean in there and talk --
23 A. To say nice things about Mr. Jackson.
24 Q. And you said something else.
25 A. And to not talk about what goes on in the
26 ranch.
27 Q. Where did this conversation take place.
28 A. I think it was the main house. 699

1 Q. What -- what time was it when you left the
2 ranch.
3 A. It was night.
4 Q. Was it dark outside.
5 A. Yeah. It was late night.
6 Q. When you got to Hamid's house, who else was
7 there.
8 A. Frank was there. Vinnie was there. And
9 another male, younger male was there. And Bradley
10 was there, Mr. Miller was there.
11 Q. Okay. And that night, you eventually ended
12 up in a video; is that correct.
13 A. Yes.
14 Q. An interview.
15 A. Yes.
16 Q. Do you remember the name of the gentleman
17 who actually did the interviewing.
18 A. No. I don't remember. He was a young male.
19 Q. Can you describe him at all.
20 A. Thin face. White skin. He was
21 young-looking. I don't remember.
22 Q. Now, before -- when you got to Mr. -- when
23 you got to Hamid's house and before the filming took
24 place, what were you doing. You personally, what
25 were you doing. Where you were in the house.
26 A. In Hamid's house.
27 Q. Yes.
28 A. Standing, facing the -- like the area where 700

1 we filmed it.
2 Q. Did you see where your mother was in the
3 house.
4 A. She was getting ready, like in the rest
5 room, like --
6 Q. Did you see your mom have any conversations
7 with anybody.

8 A. Don't remember.
9 Q. Okay. Now, who participated in the video.
10 A. Me, my mom and my brothers.
11 Q. And how long did it last.
12 A. Very long time. We were there until, I
13 think it was like 4:00 in the morning.
14 Q. Now, during the interview -- I want you to
15 speak for yourself, okay.
16 A. Okay.
17 Q. Nobody else. During the interview, you were
18 depicted at one point crying on the interview.
19 A. Yes.
20 Q. Okay. And why were you crying.
21 A. I was crying for my brother.
22 Q. And why were you crying for your brother.
23 A. Because I was talking about things about
24 him.
25 Q. What was so upsetting about that.
26 A. Because Gavin had heard, like, people say
27 that he was a faggot. And he would cry to me about
28 that. And that hurt me, being his older sister. I 701

1 wanted to protect him any way I can.
2 Q. Were there any other things that you had
3 heard that were upsetting you when you were talking
4 on this video that made you cry.
5 MR. MESEREAU: Objection; leading.
6 THE WITNESS: No.
7 THE COURT: Overruled.
8 You may answer.
9 THE WITNESS: The only thing that hurt me
10 was things about my brother. There was no other
11 reason to cry.
12 Q. BY MR. SNEDDON: Didn't have anything to do
13 with the defendant.
14 A. No.
15 MR. MESEREAU: Objection.
16 THE COURT: Leading; sustained. The answer
17 is stricken.
18 Q. BY MR. SNEDDON: On the video, there are
19 some statements with regard to Mr. Jackson
20 helping -- helping you kids with homework. Do you
21 remember those statements.
22 MR. MESEREAU: Objection; leading.
23 MR. SNEDDON: Just foundational, Your Honor.
24 MR. MESEREAU: And hearsay.
25 THE COURT: Yeah, the objection is overruled.
26 You may answer the question. I'll have it
27 read back for you.
28 (Record read.) 702

1 THE WITNESS: Yes.
2 Q. BY MR. SNEDDON: Did Mr. Jackson ever help
3 you with your homework.
4 A. No.
5 Q. Why are you smiling about that.
6 A. Becasue they took us out of school. There
7 was no homework to help us with.
8 Q. On the video, there are statements to the
9 effect that Mr. Jackson was always there and you had
10 a phone number where you could call him.
11 A. Uh-huh.
12 Q. Do you remember that.
13 A. Yeah.
14 MR. MESEREAU: Objection. Leading.
15 THE COURT: Overruled.
16 Q. BY MR. SNEDDON: Was that statement true.
17 A. No.
18 Q. Why.
19 A. Because any phone number we had of him, that
20 Gavin had of him, it would get disconnected.
21 MR. MESEREAU: Excuse me, Your Honor. I
22 didn't quite hear that. Could I have it read back,
23 please.
24 THE COURT: Yes.
25 MR. MESEREAU: Thank you.
26 (Record read.)
27 MR. MESEREAU: Thank you.
28 Q. BY MR. SNEDDON: At this particular point in 703

1 time, with regard -- I only want you to speak for
2 yourself, not for anybody else on that video. Okay.
3 There are statements on that video that --
4 about people thinking of Mr. Jackson as family.
5 A. Yeah.
6 Q. And as your dad.
7 A. Yeah.
8 Q. Or daddy. Only speaking for yourself at
9 this point in time, were those sentiments that you
10 shared.
11 A. At the beginning, I found him like a close
12 friend, but they started changing, my feelings
13 towards him.
14 Q. Why.
15 MR. MESEREAU: Objection; nonresponsive.
16 THE COURT: Just a moment, please.
17 Sustained; nonresponsive.
18 Do you want the question read back.
19 MR. SNEDDON: I do, because I thought it
20 was. Maybe I can look at it on the screen or read
21 it back.
22 (Record read.)

23 THE COURT: I sustained the objection. I
24 didn't mean for you to read the answer.
25 THE REPORTER: I'm sorry.
26 THE COURT: The question was -- just
27 rephrase the question so we can move on.
28 Q. BY MR. SNEDDON: With regard to the 704

1 statements about considering Michael Jackson, the
2 defendant in this case, as "Daddy" or "Michael
3 Daddy," did you share those sentiments.
4 A. No.
5 Q. Did you share them at one time.
6 A. As a close friend, yes.
7 Q. Pardon.
8 A. I felt him as a close friend, yes.
9 Q. When was that.
10 A. At the beginning.
11 Q. Now, after this -- before you went up to
12 the -- let's go back, now, before you've gone to the
13 filming, okay. What was the atmosphere like for you
14 personally at the ranch before the filming.
15 A. It was just a lot of secrecy. I was mainly
16 by myself. Or other times I would go in my mom's
17 room. Just -- I don't know. It was weird.
18 Q. Did you have any interaction with Dieter,
19 with the person you've identified as Dieter.
20 A. Not by myself, no.
21 Q. Not by yourself. With you and others.
22 A. Yeah, with my brothers. Like he would pull
23 us aside and talk to us and he would say, "I need to
24 talk to you guys."
25 Q. And what would he talk to you about.
26 A. Well, during the time of the rebuttal film,
27 he had told us about the death threats.
28 MR. MESEREAU: Objection; hearsay. 705

1 MR. SNEDDON: Same offer, Your Honor.
2 THE COURT: Conditionally admitted.
3 Q. BY MR. SNEDDON: Okay. Could you start over
4 again about what Dieter told you.
5 I don't know why I'm leaning into this.
6 It's not on.
7 A. Other than the rebuttal film, it was that he
8 told us there was death threats on us. And that's
9 why we needed to leave.
10 Q. All right. After the filming took place,
11 where did you go. After you filmed at Hamid's
12 house, where did you guys go that night.
13 A. Vinnie took us -- we stood at a hotel in
14 Calabasas, I think. I think that was a period of

15 time.
16 Q. Did you remember a situation where you met
17 with some social workers.
18 A. Yes.
19 Q. And when did that occur. Before or after
20 the rebuttal film.
21 A. That was after the rebuttal film.
22 Q. Do you remember when in relationship to the
23 rebuttal film, in terms of time.
24 A. After.
25 Q. Okay. Bad question. How long after.
26 A. I think it was the next day. Next morning.
27 That morning. Because we did -- we slept -- we
28 didn't really get that much sleep, and then the 706

1 ladies came that morning.
2 Q. Okay. Where did the interview occur.
3 A. At Jay's house.
4 Q. How did you get to Jay's.
5 A. Vinnie took us.
6 Q. From where.
7 A. From Hamid's house.
8 Q. From Hamid's house.
9 A. Yeah.
10 Q. Now, were you a part of that conversation.
11 A. Yes.
12 Q. And prior to the time -- let's just try it
13 this way. What time -- do you remember what time it
14 was when everybody started to arrive at the
15 apartment.
16 A. It was early. Late morning, early -- yeah,
17 it was early afternoon.
18 Q. Okay. So who's at the apartment.
19 A. Um --
20 Q. Before anybody arrives, who's at the
21 apartment.
22 A. Jay -- no. Jay wasn't there. It was me, my
23 mom, my brothers.
24 Q. Who's the first person to arrive.
25 A. Aja is.
26 Q. And Aja is who.
27 A. Chris Tucker's fiancée.
28 Q. Okay. And when they arrived, did she bring 707

1 somebody with her.
2 A. She brought her little baby, Dustin.
3 Q. And who arrived after that.
4 A. One of Mr. Jackson's security bodyguards.
5 Q. Can you describe this guy for us.
6 A. He was a big man, light skin, blondish-type

7 hair, orange, I don't know. And he was just -- big
8 arms.

9 Q. Called "buffed".

10 A. Yeah.

11 Q. All right. Now, had you ever met him before
12 at this point in time.

13 A. No.

14 Q. And were you present when he actually came
15 into the apartment.

16 A. Yes.

17 Q. Did you answer the door.

18 A. No. I think the door was open.

19 Q. And did you hear him identify himself.

20 A. Yeah. He talked to my mom.

21 Q. Okay. Now, did anybody else arrive before
22 the social ladies -- social workers.

23 A. Other than Aja and the bodyguard, no.

24 Q. Now, do you recall what happened when the
25 social service ladies arrived.

26 A. They asked everybody to leave. They only
27 wanted to talk to me and my mom and my brothers.

28 Q. How many ladies came. 708

1 A. Three ladies.

2 Q. Do you remember their names at all.

3 A. No.

4 Q. Now, did anything happen before, or at the
5 time that the ladies asked everybody to leave.

6 A. Yeah.

7 Q. What happened.

8 A. There was a time that Mr. Jackson's
9 bodyguard pulled my mom aside into her room -- well,
10 Jay's room.

11 Q. So you couldn't hear what was going on
12 inside that room.

13 A. No.

14 Q. Could you see anything.

15 A. Well, after he left --

16 Q. No --

17 A. Not after he left, but like the door --

18 Q. Let me rephrase the question. At that time,
19 when your mother and the bodyguard walked into the
20 bedroom, could you see anything at that point in
21 time.

22 A. No.

23 Q. Okay. Now, later, did you go into that
24 bedroom.

25 A. Later I could see into the bedroom.

26 Q. Okay. And what did you see.

27 A. There was, like, a black little square thing

28 on the bed. And I saw my mom grab it and put it on 709

1 top -- inside the closet, on top.
2 Q. Okay. Now, did -- were there any other
3 things that occurred before you started your
4 interview with the ladies.
5 A. No.
6 Q. Did you see a video played at any time.
7 A. Not that I remember.
8 Q. All right. Tell us what happened during the
9 interview. Who's present during the interview.
10 A. Me, my mom and my brothers and the three
11 ladies.
12 Q. And were you interviewed all at the same
13 time or at separate times.
14 A. All together.
15 Q. And how did that occur.
16 A. They just asked us what were the sleeping
17 arrangements, how we felt about Mr. Jackson, and
18 that's what I remember.
19 Q. Do you remember what you said during that
20 time.
21 A. I don't remember.
22 Q. Were you present during the entire
23 conversation. All of you stayed there the whole
24 time.
25 A. Yes.
26 Q. Okay. Now, how long did that conversation
27 take.
28 A. About 30 minutes. It wasn't that long. 710

1 Q. And you guys -- when I say "you guys," you
2 and your brothers and your sister and your mother --
3 all remained in the same room through the entire
4 conversation.
5 A. Me and my brothers and my mom, yeah.
6 Q. Yeah, your sister. I apologize.
7 Now, after that conversation with the social
8 ladies - all right - where did you go.
9 A. Aja took us back to the ranch, because --
10 Q. Took "us." Who is "us".
11 A. Me and my brothers. My mom stayed. But the
12 bodyguard wanted to take us, but we asked Aja to
13 take us.
14 Q. So the bodyguard was still there when you
15 guys finished the meeting.
16 A. Afterward. We didn't know where he went.
17 And then he showed up afterwards. And we were,
18 like, near Aja's car, and we were saying bye to her.
19 Q. And where did your mother go, to your
20 knowledge.
21 A. She stood there at Jay's apartment.

22 Q. So you went back to the ranch, and did you
23 stay there, that night, at the ranch.
24 A. Yes.
25 Q. Okay.
26 MR. SNEDDON: All right. I want to show
27 some photographs at this point.
28 All right. We've had a little break here. 711

1 I'll just move this over.
2 All right. You ready.
3 MR. MESEREAU: Yes.
4 MR. SNEDDON: I didn't want to start --
5 MR. MESEREAU: Thank you.
6 Q. BY MR. SNEDDON: The photograph you have in
7 front of you is People's 19 for identification. Do
8 you recognize that.
9 A. Yes.
10 Q. I'm sorry. Do you recognize that. Is that
11 an accurate depiction of the person it represents.
12 A. Yes.
13 Q. Just flip that over, if you could.
14 Now, turn that one sideways. No, the other
15 one, the new one, so I can see the number.
16 All right. That's People's 30 for
17 identification. Do you recognize the person in this
18 photograph.
19 A. Yes.
20 Q. And is that an accurate depiction of that
21 person.
22 A. Yes.
23 Q. Okay. Why don't you turn that one over.
24 And People's 23, do you recognize that
25 person.
26 A. Yes.
27 Q. Is that an accurate depiction.
28 A. Not really. 712

1 Q. Okay. He's a little different than when you
2 saw him, right.
3 A. Yes, he's --
4 Q. We'll go into that in just a second. But
5 you recognize the person.
6 A. Yes.
7 Q. Okay. Now, the exhibit that you have there,
8 that you just turned sideways, is 194. And do you
9 recognize that.
10 A. Yes.
11 Q. Okay. Is that an accurate depiction of what
12 it represents.
13 A. Yes.

14 Q. Okay. Turn that over.
15 135. And do you recognize that.
16 A. Yes.
17 Q. And is that an accurate depiction.
18 A. Yes.
19 Q. Okay. And 138, do you recognize that.
20 A. Yes.
21 Q. And is that an accurate depiction.
22 A. Yes.
23 Q. All right. The last one, which is 125, do
24 you recognize that.
25 A. Yes.
26 Q. And is that an accurate depiction.
27 A. Yes.
28 Q. Okay. Why don't you flip those back over in 713

1 the same order, and I'm going to ask you some
2 questions about them. And we're going to show some
3 photographs.
4 MR. AUCHINCLOSS: Can we go to Input 1, Your
5 Honor. Thank you.
6 Q. BY MR. SNEDDON: All right. The photograph
7 that's on the board there -- first of all, I'm
8 sorry, Your Honor, I apologize. I don't think
9 there's any issue, move to admit these exhibits that
10 have just been identified.
11 MR. MESEREAU: There's no objection.
12 MR. SNEDDON: I'm sorry.
13 THE COURT: They're admitted.
14 Q. BY MR. SNEDDON: What is the number of the
15 exhibit that's on the board up there.
16 A. 19.
17 Q. Do you recognize that person.
18 A. Yes.
19 Q. Who is that.
20 A. Vinnie.
21 Q. Do you know Vinnie's last name.
22 A. No.
23 Q. Okay. Why don't you turn that one over,
24 then.
25 Do you remember where it was that you met
26 Vinnie for the very first time.
27 A. It was at the ranch.
28 Q. All right. The next -- what's the number of 714

1 the next one in front of you.
2 A. That's Jesus. No. 30.
3 Q. No. 30. Okay. And would you look up on
4 the -- that's No. 30.
5 A. Yeah.

6 Q. Who is that.
7 A. Jesus.
8 Q. Okay. Where did you meet Jesus for the
9 first time.
10 A. At the ranch.
11 Q. Okay. And the next one. What number is
12 that.
13 A. 23.
14 Q. 23. And who is that.
15 A. That's Bradley Miller.
16 Q. And you said that there's something about
17 this photograph that's a little different than you
18 remember about this individual at the time.
19 A. He's bigger. He's --
20 Q. I'm sorry.
21 A. He's not as thin any -- he's not as thin.
22 He's fuller in the face.
23 Q. Now or then.
24 A. Now he's fuller in the face.
25 Q. Okay. So he looks skinnier in this
26 photograph.
27 A. Yeah.
28 Q. Okay. And where was Mr. Miller the first 715

1 time that you met him; do you remember.
2 A. At Jay Jackson's apartment.
3 Q. All right. Why don't you turn that over and
4 we'll get to the next one.
5 All right. What's the number on that.
6 A. 194.
7 Q. 194. Okay. And what is one -- not that
8 one. Keep going. No, keep going.
9 Okay. Is that 194 that's on the board there
10 now.
11 A. Yes.
12 Q. And with regard to that particular
13 photograph, what is that.
14 A. That's Hamid's house.
15 Q. And --
16 A. That's where we filmed the rebuttal.
17 Q. In that room.
18 A. In that area.
19 Q. Okay. What part of the area. Take the
20 light. Take the light, that little meter, and show
21 the ladies and gentlemen of the jury where it is.
22 A. Right here. They moved the couch and they
23 put a screen behind us.
24 Q. Okay. Hold on just a second.
25 The next number that you have there.
26 A. It's 135.
27 Q. Okay. What's 135.
28 A. It's -- it's a -- it's the kitchen of the -- 716

1 Q. Tell us what's in the photograph.
2 A. It's the kitchen of the suite.
3 Q. All right. All right. There we go. Now,
4 do you recognize that.
5 A. Yes.
6 Q. Okay. And you say, "The kitchen of the
7 suite." Where was this.
8 A. In Calabasas.
9 Q. Now, let's -- that's all right. Just leave
10 it up there.
11 Now, did you stay in the room in Calabasas.
12 A. Yes.
13 Q. How long were you there.
14 A. Couple days.
15 Q. And who was -- who stayed in that room with
16 you.
17 A. Me, my mom and my brothers.
18 Q. Were there any other people staying at the
19 same -- at the same time at that place.
20 A. Yes.
21 Q. Who.
22 A. Frank and Vinnie were. Well, at first it
23 was Vinnie and then Frank came later on.
24 Q. Do you know, of your own personal knowledge,
25 where their room was.
26 A. If you -- if you were to go out the door,
27 there was a hallway of just rooms. And we couldn't
28 get to the elevator unless we passed by their room. 717

1 Q. And how -- what floor were you on.
2 A. I think it was the second or third floor.
3 Q. Okay. Could you see the lobby from your --
4 outside your room.
5 A. If you walk out our door and go to the
6 right, you can look down into the lobby.
7 Q. When you went into the lobby area, did you
8 see anybody you recognized.
9 A. Yes.
10 Q. Who was that.
11 A. It was one of the bodyguards.
12 Q. Had you ever seen him before.
13 A. Yeah. I think he was the same one that gave
14 us the -- he was the one that came during the
15 ladies, with the meeting with the ladies from -- the
16 social workers.
17 Q. How often did you see him down in the lobby.
18 A. Anytime we looked down there.
19 Q. And were there times when you would walk
20 down the hall towards the elevator.

21 A. Yeah.
22 Q. You and your brothers.
23 A. And either -- they would have their door
24 open if they were there.
25 Q. Who's "they".
26 A. Frank and Vinnie.
27 Q. And what happened.
28 A. Just -- they would ask us, "Where are you 718

1 going. What do you need to do. We'll get it. Just
2 stay in your room."

3 Q. All right. The next photograph is -- do you
4 recognize what's depicted in that photograph in
5 front of you.

6 A. Yeah.

7 Q. And what's the number.

8 A. 138. That's the room that I stood in.

9 Q. The one that's on the board now is 138,
10 correct.

11 A. Yes.

12 Q. That's the one you stayed in.

13 A. Yes.

14 Q. Did you have a room all by yourself.

15 A. Yes.

16 Q. And then the next one is 125.

17 A. Yes.

18 Q. And that's -- what's 125.

19 A. That's the outside of the hotel.

20 Q. And this is the hotel you stayed in.

21 A. Yes.

22 Q. Now, when you say this is the hotel you
23 stayed in, it's the one that has the kitchen and the
24 bed that you just talked about for the ladies and
25 gentlemen of the jury.

26 A. Yes.

27 MR. SNEDDON: Now, I have one last

28 photograph, Your Honor, I neglected to get marked, 719

1 or identified. It's People's 29.

2 Q. Okay. Now, do you recognize the person
3 depicted in that photograph.

4 A. Yes.

5 Q. People's 29 for identification.

6 A. Yes.

7 Q. And with regard to the person depicted in
8 that particular photograph, is that an accurate
9 depiction of the individual --

10 A. Yes.

11 Q. -- as you recall them.

12 A. Yes.

13 MR. SNEDDON: Move that it be admitted, Your
14 Honor.
15 MR. MESEREAU: No objection, Your Honor.
16 THE COURT: It's admitted.
17 Q. BY MR. SNEDDON: All right. Well, let's
18 just put it this way: Who is that person.
19 A. Hamid.
20 Q. All right. So that's the individual who
21 picked you up and took you to his house.
22 A. Yes.
23 Q. And did the filming.
24 A. Yes.
25 Q. Okay. There we go. So that's Hamid.
26 A. Yes.
27 THE BAILIFF: Judge, it's 1:15.
28 MR. SNEDDON: You can take that down. We're 720

1 not going to ask any more questions on that.
2 Q. Now I want to ask you some questions about
3 your time at the ranch. Okay.
4 A. (Nods head up and down.)
5 Q. During the time that you were staying at
6 Neverland Ranch, did you ever see your brothers
7 drink.
8 A. Yes.
9 Q. On how many occasions.
10 A. Once.
11 Q. Could you tell the ladies and gentlemen of
12 the jury, where was that when you saw it.
13 A. It was in the arcade. It was -- if you move
14 a jukebox out of the way, it leads into a staircase.
15 You go down the staircase, you make a right, there's
16 another room and it has like sleeping bags and
17 stuff. And you go into a little tiny room that's --
18 if you go into that room, make a right, there's a
19 little tiny room and then that's the wine cellar.
20 Q. Okay.
21 A. That's where Mr. Jackson, my brothers and
22 Aldo were.
23 THE COURT: Would you like to take a break.
24 MR. SNEDDON: (Nods head up and down.)
25 THE COURT: All right. We'll take one.
26 (Recess taken.)
27 THE COURT: Go ahead.
28 MR. SNEDDON: Judge, may I make a request of 721

1 the Court.
2 THE COURT: Yes.
3 MR. SNEDDON: I understand there may be some
4 difficulty with some of the people being able to

5 hear the witness, and that if that's the case, maybe
6 somebody -- if it's a lawyer or the jury, they could
7 raise their hand and let us know so we can take
8 action accordingly.

9 THE COURT: Yes.

10 MR. SNEDDON: Okay. Thank you.

11 THE COURT: We're working on that problem.

12 We're going to try and get a different mike for
13 them.

14 MR. SNEDDON: That would be great. Thank
15 you.

16 Q. I think where we left off was at Neverland
17 Ranch.

18 A. Yes.

19 Q. And you had described to us the arcade and
20 the cellar inside the arcade.

21 A. Yes.

22 Q. And I think what I asked you was, did you
23 ever see your brothers drink at the ranch.

24 A. Yes.

25 Q. On how many occasions.

26 A. Once.

27 Q. And where.

28 A. It was in the wine cellar under the arcade. 722

1 Q. And who else was present at that time.

2 A. Mr. Jackson, Gavin, Star and Aldo.

3 Q. And what was going on when you -- did you
4 walk down there with them, or did you join them
5 there.

6 A. No, I had always seen people walking down
7 there and they would come up with cups. But I never
8 knew what was really down there until one time I
9 walked in, and I just followed them when they were
10 going down.

11 Q. And this is the one time you're talking
12 about.

13 A. Yeah.

14 Q. All right. When you followed them in there,
15 tell us what you saw.

16 A. When I walked into the wine cellar, I saw
17 Mr. Jackson pouring wine into cups.

18 Q. Into what.

19 A. Into cups.

20 Q. Lean forward. I'm sorry, we got to do that.
21 And how many cups.

22 A. I don't know. They were just cups. I don't
23 remember how many there were.

24 Q. Did everybody have one.

25 A. Yeah.

26 Q. Did you see anybody drink out of it.

27 A. Yeah.

28 Q. Who drank. 723

1 A. Well, I saw Gavin, Star and Aldo drinking.

2 Q. All right. Anybody else.

3 A. Well, Mr. Jackson was drinking also.

4 Q. Did you get offered something to drink.

5 A. Yes.

6 Q. And did you take it.

7 A. Yes.

8 Q. And what was it.

9 A. It was wine.

10 Q. What makes you think it was wine.

11 A. I don't know. Because it was clear and -- I

12 don't know anything about liquor, so I don't know.

13 Q. How did it taste.

14 A. Funny and, I don't know, weird.

15 Q. All right. Is that -- were there any other

16 occasions while you were at the ranch that you saw

17 your brothers drinking with Mr. Jackson.

18 A. No.

19 Q. Were there any other occasions at the ranch

20 where you drank.

21 A. No.

22 Q. How long were you downstairs in the wine

23 cellar.

24 A. Ten minutes.

25 Q. Did they all leave in ten minutes or did

26 just you leave.

27 A. Well, we all went up.

28 Q. Where did you go. 724

1 A. Back up to the arcade.

2 Q. Did you take your cups with you, or did you

3 leave them down there. Tell me what you did with

4 your cup.

5 A. Well, I drank some, and then we went

6 upstairs and I just left it on the counter.

7 Q. A counter where.

8 A. In the -- in the arcade there's a counter,

9 and you could just put it -- I just put it right

10 there, and there's like a slushy machine there next

11 to it.

12 Q. A what.

13 A. A slushy machine next to it. It's kind of

14 like -- I don't know how to describe it. It's just

15 a counter, and then behind it there's like a fake

16 cash register and stuff.

17 Q. You put your cup there.

18 A. Uh-huh.

19 Q. Now, with regard to the other individuals

20 that were in the cellar, let's talk about them one
21 by one. Okay.
22 A. Yes.
23 Q. You came up the stairs and put your cup on
24 the counter there.
25 A. Yeah.
26 Q. With regard to the defendant, Michael
27 Jackson, did he come up the stairs at the same time
28 as you. 725

1 A. Well, yeah, one after another.
2 Q. And so everybody came upstairs.
3 A. Yeah.
4 Q. Everybody at the same time.
5 A. Yeah.
6 Q. Did -- when you all got upstairs and you
7 were all back in this arcade area, what went on
8 then.
9 A. They just listened -- well, we all listened
10 to music and then they were playing some games.
11 Q. By "they," who do you mean.
12 A. Well, all of us. Gavin, Star, and then Mr.
13 Jackson was listening to music.
14 Q. Did Mr. Jackson stay there.
15 A. Yes.
16 Q. Now, with regard to the cups that everybody
17 had downstairs, can you tell us whether anybody
18 besides yourself brought their cups upstairs.
19 A. Everybody did.
20 Q. When you were up there, did you see whether
21 or not the people who brought their cups upstairs
22 continued to use those cups and continued to drink.
23 A. I saw them sipping on it and drinking it. I
24 don't know when they stopped or -- but from what I
25 saw, they kept drinking it.
26 Q. Did you see your brother Gavin drinking
27 upstairs.
28 A. Yeah. 726

1 Q. And your brother Star.
2 A. Yeah.
3 Q. And Aldo.
4 A. Yeah.
5 Q. And how about the defendant.
6 A. Yes.
7 Q. How long were you up there in the arcade
8 with them that time.
9 A. Not very long because it was already night
10 and I was tired, so I didn't stay there very long.
11 Q. When you left the arcade that night, can you

12 tell us whether or not anybody left with you.
13 A. No, they stood there.
14 Q. I'm sorry.
15 A. No, they stood there.
16 Q. Now, when -- when you came up the stairs out
17 of the cellar --
18 A. Yeah.
19 Q. -- okay. - is there a door to that cellar.
20 A. What do you mean, like "door". Like when
21 you walk down the stairs, I don't remember seeing a
22 door. That's not the actual wine cellar. You got
23 to go to the right, and there's a little room and
24 that's where the wine bottles are at.
25 Q. Okay. When you came back up out of the wine
26 cellar into the other room and up the stairs into
27 the arcade - okay. --
28 A. They just put the juke box back. 727

1 Q. Pardon.
2 A. They just put the juke box back. That's
3 what blocks the staircase.
4 Q. That's what I'm asking. You're way ahead of
5 me. So there is a juke box up there.
6 A. Yeah.
7 Q. And where did it go.
8 A. It blocks the staircase.
9 Q. Okay. And did they put it back.
10 A. Yeah.
11 Q. Do you remember who put it back.
12 A. No. I don't remember. I just remember it
13 got put back.
14 Q. Now, during the time that you were at
15 Neverland Valley Ranch, did you ever go into Mr.
16 Jackson's bedroom.
17 A. During the stay at Neverland Ranch, yes, I
18 did once.
19 Q. How many times.
20 A. Once.
21 Q. And do you remember when it was that you
22 went into his bedroom, in terms of how long you'd
23 been there once you got back from Miami.
24 MR. MESEREAU: Objection. Misstates the
25 evidence; leading question.
26 THE COURT: Sustained as to misstates the
27 evidence. Just rephrase it.
28 Q. BY MR. SNEDDON: You told the ladies and 728

1 gentlemen of the jury that you had been in Mr.
2 Jackson's bedroom on one occasion.
3 A. Yes.

4 Q. This is at the ranch.
5 A. Yes.
6 Q. All right. When, in point in time, was it
7 that you went into his bedroom. Was it in the
8 daytime or in the nighttime.
9 A. It was in the nighttime.
10 Q. And was it before -- was it after you
11 arrived back from Miami.
12 A. Yeah.
13 Q. So it was during that time frame.
14 A. Yes.
15 Q. Now, would you tell us the circumstances
16 under which you got into Mr. Jackson's bedroom.
17 A. I went after the boys, because there's no
18 way I could get into the room unless it was after
19 them.
20 Q. Why is that.
21 A. Because there's a code to get into his room.
22 Q. Did you have the code.
23 A. No.
24 Q. And you said the boys went -- you followed
25 the boys.
26 A. Yes.
27 Q. Was there anybody with the boys.
28 A. Aldo was there, I think. I think Mr. 729

1 Jackson was already in the room. I'm not sure.
2 Q. So you followed them into the room, in any
3 case.
4 A. Yeah.
5 Q. Okay. Describe what you saw when you got
6 into the room.
7 A. There's a couch.
8 Q. Lean into the mike. Nice and loud, please.
9 A. There's a couch there. There's a music
10 thing. There's a little game that -- that's all I
11 remember. And then if you go straight back, there's
12 his bathroom, and then right up next to the door of
13 the bathroom there's, like, a desk and it has a
14 phone on there.
15 Q. Now, when you followed the boys into the
16 room, what part of the room did you go into at
17 first.
18 A. Just that front area. I guess it's like a
19 living-room-type.
20 Q. And how long were you there.
21 A. Ten minutes. Not that long.
22 Q. And Mr. Jackson was there.
23 A. Yeah. I don't remember. I just remember us
24 like sitting and me looking around, like, because
25 I'd never been in there before.
26 Q. Okay. Did you ever go upstairs.

27 A. Yes. I went upstairs after.
28 Q. And when you got upstairs, describe the 730

1 upstairs to me.
2 A. There's a bed in the middle and then there's
3 a little nightstand. There's a bunch of figurines.
4 When you first walk up the stairs, like, a bunch of
5 like toys and like figurines right here. And then
6 there's a screen that can be pulled down to watch
7 movies. That's all I remember.
8 Q. Do you remember whether the screen was down
9 or up at the time you went in.
10 A. I think it was down already.
11 Q. Now, who was in the bedroom.
12 A. Mr. Jackson, Gavin, Star, Aldo and me.
13 Q. Okay. Where was Mr. Jackson in the room.
14 A. Well, after we all got settled, Mr. Jackson
15 was laying on the bed, and then Gavin was next to
16 him, and then Star. That's what I remember.
17 Q. Do you remember where Aldo was.
18 A. I think he was sitting on like the corner of
19 the bed. And I was sitting on a chair.
20 Q. Go ahead.
21 A. I was sitting on a chair.
22 Q. When you walked into that room that time,
23 did you see any alcohol in the room.
24 A. Yes. I saw empty bottles or half full
25 bottles.
26 Q. Of what.
27 A. Of alcohol -- I know the shape of bottles,
28 but I don't know what they were, like the names. 731

1 Q. Where did you see it.
2 A. Some were on the nightstand. Some were on
3 the desk, like a stand where the computer was. Some
4 were on that, where the figurines were.
5 Q. Okay. I've got a couple more photographs
6 I'm going to show you before you get to step down.
7 People's 75, do you recognize that.
8 A. Yes.
9 Q. And is that an accurate depiction of what
10 the room looked like.
11 A. Yeah. It's real -- messier.
12 Q. So we'll talk about that in just a moment.
13 And People's 76, do you recognize that.
14 A. Yes.
15 Q. And is that an accurate depiction.
16 A. Yeah. There's some extra things, but that's
17 pretty much how it was.
18 MR. SNEDDON: Okay. Move that 75 and 76 be

19 admitted into evidence, Your Honor.
20 THE COURT: They're admitted.
21 MR. SNEDDON: All right. I'd like to have
22 75 put up on....
23 Q. All right. With regard to the exhibit,
24 People's 75, do you recognize that.
25 A. Yes.
26 Q. And what is that.
27 A. That's where I kept saying where there was
28 figurines there. 732

1 Q. Lean into the mike.
2 A. That's where I kept saying there was
3 figurines at, like in that area.
4 Q. Now, do you see things that are different in
5 that photograph now than when you were there, that
6 you recall.
7 A. I don't remember seeing that T.V. It wasn't
8 as messy.
9 Q. Okay. Now, do you see locations in that
10 photograph, People's 75, in which you saw the
11 bottles that you thought were liquor.
12 A. Like there was some right here. There was
13 some, like, where there was enough stability to put
14 them. Like anywhere there was, like, stability to
15 put one, there -- because it looks different. I
16 don't know.
17 Q. Go ahead and put the light on where you put
18 it the first time, and let's talk about that.
19 A. Like, they were on the nightstands.
20 Q. Okay. And leave the light on. Okay. On
21 the nightstand on the left-hand side of the bed.
22 A. And there was some on the other side
23 nightstand, too.
24 Q. Were there any bottles located on this side
25 of the room that's depicted in People's 75, that you
26 recall.
27 A. Yeah. There was some -- well, when -- this
28 was not as messy. There was some right here, and 733

1 then there was one or two right there.
2 Q. Okay. Let's go to the next exhibit. That
3 exhibit is People's 76. Do you see that.
4 A. Yes.
5 Q. All right. Now, is there anything that's in
6 that photograph that wasn't there when you were
7 there.
8 A. The crib and this was -- I don't remember
9 seeing that.
10 Q. So by "this," do you mean there's a little

11 object that looks like it has a screen that's
12 directly underneath a lamp or between a lamp and the
13 crib.
14 A. Yes.
15 Q. And that wasn't there, to your recollection.
16 A. I don't remember.
17 Q. And what was the other thing.
18 A. The crib wasn't there.
19 Q. All right. Now, indicate to the ladies and
20 gentlemen of the jury -- could you indicate where it
21 was that Mr. Jackson was inside the room when you
22 saw him.
23 A. Right here.
24 Q. And where was Gavin.
25 A. Next to him.
26 Q. So let's go back to Mr. Jackson. If you'd
27 put the red light up there again. On People's 76,
28 you're indicating on the far left-hand side of the 734

1 bed.
2 A. Yes.
3 Q. And next to him was Gavin.
4 A. Yes.
5 Q. And then where was your brother Star.
6 A. He was on the other end, but I'm trying to
7 remember. I think his son was there too. Like in
8 between Star and Gavin. I'm trying to remember.
9 Q. All right. Go ahead.
10 A. Yeah.
11 Q. And where on that exhibit, People's No. 76,
12 did you see bottles.
13 A. There was some more on this nightstand, and
14 then if you face the other way.
15 Q. Lean into the microphone. Go ahead.
16 A. If you face the other way, like, facing that
17 way, there was a computer to the left of the T.V.
18 screen. It used to be a computer right there.
19 There was some right there.
20 Q. And what was the computer on.
21 A. On a stand, I guess. I don't remember.
22 Q. All right. Do you remember how long you
23 were there in the room with Mr. Jackson and the boys
24 before you left.
25 A. 30, 45 minutes.
26 Q. Couldn't hear you.
27 A. 30, 45 minutes.
28 Q. Do you remember what was going on. 735

1 A. Well, we started watching a movie.
2 Q. Do you remember the movie.

3 A. No. It was just -- I remember it had
4 subtitles. I just remember it had subtitles.
5 Q. And how were you watching the movie. Was it
6 on the --
7 A. On that big screen that you pull down.
8 Q. Okay. Now, when you left Mr. Jackson's
9 room, did the boys leave with you or did you go by
10 yourself.
11 A. I left by myself.
12 Q. Did anybody else leave with you at that
13 time.
14 A. No.
15 Q. Where did you go.
16 A. I went to my room.
17 MR. SNEDDON: Now, we can take that down
18 now, if you want. And turn the lights on, would be
19 fine, Your Honor.
20 Q. You told the ladies and gentlemen of the
21 jury that there was a time that you went to that
22 Calabasas hotel that you identified in those
23 photographs.
24 A. Yes.
25 Q. Now, while you were at that particular
26 hotel - okay. - did you go anywhere with Frank Tyson
27 or Vinnie Amen.
28 A. Yes. 736

1 Q. Where did you go.
2 A. They took us to go get passports.
3 Q. Did you go with them.
4 A. Yes.
5 Q. Where else.
6 A. That's all I remember right now.
7 Q. Did you ever go shopping.
8 A. Oh, we did go shopping one time.
9 Q. Where did you go.
10 A. We went to like an outlet place to go pick
11 up some luggages. And then we went to the mall and
12 picked up some clothes.
13 Q. And what was the reason you went shopping.
14 A. They told us we were going to Brazil.
15 Q. I'm sorry, I couldn't hear you.
16 A. Because they told us we were going to
17 Brazil.
18 Q. Who told you that.
19 A. Frank. And then earlier on Dieter had
20 already said that.
21 Q. Did they say why you were going to Brazil.
22 A. Because they said that -- to get us away
23 because there was death threats on us.
24 Q. Who told you that.
25 A. Dieter. And then Frank told me another

26 time, also.
27 Q. And you mentioned earlier in your testimony
28 that you had made a trip to The Laugh Factory. 737

1 A. Yes.

2 Q. Okay. Where is The Laugh Factory; do you
3 know.

4 A. It's in Hollywood.

5 Q. And do you remember -- was it during the
6 time you were at Calabasas or some other time.

7 A. I think it was during that time.

8 Q. Now, who went to The Laugh Factory.

9 A. We all -- Vinnie, my mom, my brothers and me
10 went to The Laugh Factory. But my mom and Gavin
11 were the only ones that got off.

12 Q. "Got off." What do you mean, "got off".

13 A. Got off the car and went to go see Jamie.

14 Because Vinnie told us to stay --

15 Q. Just slow down. Let's take it one at a
16 time. Okay. Make sure we got all the characters
17 here.

18 You got into a car. You left from
19 Calabasas, and you went to The Laugh Factory.

20 A. Yeah.

21 Q. Who's in the car.

22 A. Vinnie, me, my mom, and my brothers.

23 Q. All right. Now, you get to The Laugh

24 Factory. Who leaves the car.

25 A. My mom and my brother Gavin.

26 Q. Okay. Now, did Vinnie tell you something at
27 that point in time.

28 A. He told me and Star to stay. 738

1 Q. Did he say why.

2 A. No.

3 Q. So your mother and Gavin went inside.

4 A. Yes.

5 Q. Now, did you ever go inside during that
6 trip.

7 A. Yes, because Vinnie -- sorry.

8 Q. That's all right. We'll take it one step at
9 a time. So you went inside.

10 Now, how long had it been before -- how long
11 were you in the car with your brother and with this
12 Vinnie person that you've identified in the
13 photograph before you went inside.

14 A. About 15 minutes. About 15 minutes.

15 Q. Okay. Now, what happened.

16 A. Um --

17 Q. Why was it that you went inside.

18 A. Because Vinnie kept saying, "Where's your
19 mom. Where's your mom. Go get her." Because he
20 was, I don't know, impatient. He wanted us to
21 leave.
22 Q. Did he know, to your knowledge, who your
23 mother was meeting with.
24 A. Just Jamie.
25 Q. Now, when you went -- you told the jury you
26 went inside.
27 Do you want some water.
28 A. Yeah. 739

1 Q. All right. Did Star go in with you.
2 A. No.
3 Q. Why.
4 A. Vinnie told him to stay.
5 Q. So he let you go, but he kept Star.
6 A. Yes.
7 Q. All right. Now, you went inside. And when
8 you went inside, who did you see.
9 A. I saw Gavin, my mom and Bill.
10 Q. Did -- okay. Anybody else.
11 A. That was it.
12 Q. Now, the person you've identified as Bill --
13 A. Yes.
14 Q. -- had you ever met him before.
15 A. Never.
16 Q. This is the first time you met him.
17 A. Yes.
18 Q. How long were you inside with your mother
19 and Gavin and this person you've identified as Bill.
20 A. Five minutes, because I just ran and told --
21 I just ran in and told my mom what Vinnie told me to
22 tell her.
23 Q. So after that, did you leave The Laugh
24 Factory.
25 A. Yes. And I went back outside.
26 Q. Who came with you.
27 A. My mom and Gavin stood there a little bit
28 longer and then they came out. 740

1 Q. Did -- while you were at the Laugh Factory
2 that day, did you ever see Jamie Masada.
3 A. Yeah, he was sitting right there.
4 Q. Right where.
5 A. With my mom and Gavin and Bill.
6 Q. So he was there.
7 A. Yeah.
8 Q. So how long do you think in total that it
9 was that your mother was indeed with this person

10 Bill and Jamie Masada.
11 A. I think about 30 minutes.
12 Q. Now, after you came out of The Laugh
13 Factory, where -- did you get back in the car.
14 A. Yes.
15 Q. And your mother and Gavin came out at some
16 point, I would assume.
17 A. Yeah.
18 Q. You all got in the car.
19 A. Yeah.
20 Q. And where did you go; do you remember.
21 A. I think we went back in the hotel in
22 Calabasas.
23 Q. Now, let's talk about the Calabasas hotel
24 for just a moment. Okay.
25 A. Okay.
26 Q. Do you remember any of the buildings or
27 locations that were around the Calabasas hotel.
28 A. There was a shopping center across the 741

1 street, I think. It had like a Ralph's in it, I
2 think. I don't really remember. I just saw it when
3 we were driving by.
4 Q. Did you ever go over to the shopping center.
5 A. No.
6 Q. Why.
7 A. We were -- didn't leave the hotel room.
8 Q. Why.
9 A. I don't know. Vinnie and Frank said to --
10 not to leave.
11 Q. Did you ever go down -- does the
12 Calabasas -- does it have a swimming pool.
13 A. Yeah.
14 Q. Did you ever go down swimming.
15 A. No.
16 Q. Why.
17 A. Just -- we couldn't leave the room, so -- we
18 didn't even bother to ask, because we know it would
19 be "No."
20 Q. Does the -- to your knowledge, does the
21 lobby of the hotel have like these machines where
22 you can get Cokes and candy or treats or stuff in
23 it.
24 A. They have like -- set out on a counter, like
25 coffee and little muffins and stuff.
26 Q. And did you ever go down to get any of that.
27 A. Yeah. Yeah.
28 Q. And is that when you saw this person sitting 742

1 in the lobby.

2 A. Well, when we had first got there, Frank --
3 Vinnie introduced us to him and said that he was
4 supposed to be there to keep us safe and stuff.
5 Q. Did you ever go downstairs to try to get
6 anything.
7 A. Yeah. We did one time.
8 Q. What happened.
9 A. They just said not to leave the room. They
10 seemed kind of irritated about it.
11 Q. Who's that.
12 A. Frank.
13 Q. And when you say that they took you to get a
14 passport, did you actually physically go with
15 somebody to do that.
16 A. Yeah. Vinnie's the one that took us.
17 Q. And do you know where you went.
18 A. No. All I know was it was an office place.
19 I don't know.
20 Q. And were there any other places that you
21 went; do you recall.
22 A. Other than to go get clothes and luggage,
23 no.
24 Q. All right. In that big binder that's right
25 there in front of you -- why don't we just clear the
26 area --
27 Your Honor, if you don't mind, I could
28 just -- 743

1 Counsel.
2 (Off-the-record discussion held at counsel
3 table.)
4 MR. SNEDDON: Your Honor, there have been --
5 I will direct the Court's attention to the book that
6 it has, and in particular to Exhibits 260 and 261
7 that have been premarked for identification
8 purposes.
9 THE COURT: I have them.
10 MR. SNEDDON: And 262, Your Honor, is a
11 series of passport applications that have been duly
12 certified by the United States Government. And, in
13 fact, they've been signed off by Colin Powell. May
14 those be admitted into evidence.
15 MR. MESEREAU: No objection, Your Honor.
16 THE COURT: They're admitted.
17 MR. SNEDDON: And then with regard to the
18 second set, Your Honor, they are a set of documents
19 of visas from the Republic of Brazil. And those are
20 also accompanied by the certification of the
21 Brazilian consulate. And I ask that those be
22 admitted into evidence as 262.
23 MR. MESEREAU: May I just see those for a
24 second.

25 MR. SNEDDON: Sure.
26 (Off-the-record discussion held at counsel
27 table.)
28 MR. MESEREAU: No objection, Your Honor. 744

1 THE COURT: It's admitted.
2 Q. BY MR. SNEDDON: Okay. Now, why don't you
3 let me have these.
4 MR. SNEDDON: Your Honor, with the Court's
5 permission and counsel's permission, I would like to
6 use the originals of these documents to be displayed
7 on the Elmo, rather than copies. Because the
8 copies, you know, the Xeroxing --
9 MR. MESEREAU: No objection, Your Honor.
10 MR. SNEDDON: Is it okay -- I would ask some
11 questions to the witness, and perhaps I could give
12 the witness the Xerox copies which I've shown to
13 counsel with the Bates stamp numbers.
14 MR. MESEREAU: No objection to that.
15 THE COURT: I have a question about my
16 numbers on the exhibits. Lorna, is it --
17 THE CLERK: I have a question also, Judge.
18 THE COURT: According to our premarked
19 exhibits, 261 and 262 are not --
20 MR. SNEDDON: No, it's 260 and 261. If I
21 misspoke myself, I apologize.
22 THE COURT: Okay. Thank you.
23 MR. SANGER: Excuse me. Just for
24 bookkeeping purposes, Your Honor, what has been
25 admitted is 260 and 261 and not 262.
26 THE COURT: Correct.
27 MR. SANGER: Thank you.
28 MR. SNEDDON: With the Court's permission, 745

1 I wanted to use the Elmo. I don't know if you need
2 to use a toggle switch or do something --
3 THE BAILIFF: Input four.
4 Q. BY MR. SNEDDON: All right. We have up on
5 the board Document 260. Yes, 260. All right. Do
6 you recognize that document.
7 A. Yes.
8 Q. Do you recognize the photograph of the
9 person on that document.
10 A. Yes.
11 Q. That's you, huh.
12 A. Yes.
13 Q. All right. Now, with regard to the writing
14 that is on that particular document, is that your
15 handwriting.
16 A. No.

17 Q. With regard to the signature where it says
18 "Applicant" underneath the photograph, is that your
19 handwriting.
20 A. I don't remember signing it.
21 Q. Does it look like your handwriting.
22 A. No.
23 Q. With regard to -- do you see on the document
24 the -- just a moment. Looking on the document, 260,
25 right over in this area here; do you see that.
26 A. Yeah.
27 Q. Does it indicate the destination there,
28 where you're going. 746

1 A. Yeah.
2 Q. What's it say.
3 A. Italy and France.
4 Q. Did you ever put that in there.
5 A. No.
6 Q. Have you ever heard you were going to Italy
7 or France.
8 A. No.
9 Q. Did you see this document filled out.
10 A. Yeah.
11 Q. Who filled it out.
12 A. Vinnie did.
13 Q. Did you give him the information to put in
14 there.
15 A. I don't remember. I think he asked my mom
16 for it.
17 Q. And do you know why you were making this
18 application.
19 A. Well, they told us we were going to Brazil.
20 Q. Were you interested in going to Brazil.
21 A. Not really.
22 Q. Okay. Now, why don't you direct your
23 attention to 261 for just a second, if you would,
24 the other document. Okay. Do you have that in
25 mind.
26 A. Yes.
27 Q. That's your photograph again, correct.
28 A. Yes. 747

1 Q. Do you remember having that photograph
2 taken.
3 A. Yeah, now I remember. They took us to
4 Walgreen's to take pictures.
5 Q. When you say "they," who took you to
6 Walgreen's.
7 A. Vinnie did.
8 Q. So it was just Vinnie.

9 A. Yeah.
10 Q. And where was the Walgreen's.
11 A. It was near Calabasas. I don't remember
12 where.
13 Q. And who did they take to get the
14 photographs.
15 A. Me, my mom and my brothers.
16 Q. All at the same time.
17 A. Yes.
18 Q. All right. Now, on this particular
19 information, the -- on this particular document that
20 we're referring to, 261, there's lot of printing on
21 it. Is that your printing.
22 A. No.
23 Q. You didn't fill that out.
24 A. No.
25 Q. And the information for this, do you know
26 where it came from.
27 A. Um --
28 Q. Were you present when it was put on there. 748

1 A. Yeah.
2 Q. All right. And how did that information get
3 conveyed onto this document. Who wrote it.
4 A. Well, Vinnie wrote it, but he was asking my
5 mom.
6 Q. He didn't ask you; he asked your mother.
7 A. Yeah.
8 Q. Okay. All right. I think we can --
9 Wait just a second, Your Honor. We're going
10 to move the document up just a little farther.
11 Okay. Do you recognize the signature at the
12 bottom by the seal. Right there. And we're talking
13 now about the lower left-hand portion of the
14 document, if you're looking at it from the top.
15 A. I think that's Vinnie's signature. I'm not
16 sure.
17 Q. I couldn't hear you.
18 A. I think that's Vinnie's signature. I'm not
19 sure.
20 Q. Okay. All right.
21 Let's turn the lights on now, Your Honor.
22 Now, you said that during the time that you
23 were at Calabasas, that you recall at least one trip
24 where you went shopping for clothes and a suitcase,
25 something like that.
26 A. Yeah.
27 Q. Okay. Now, from -- did you have clothes
28 with you at the ranch. 749

1 A. Yeah, but -- a couple. Not really anything.
2 Q. And where were your belongings.
3 A. They were in my guest room. Where I was
4 staying at.
5 Q. All right. And then with regard to your
6 other belongings that weren't at the ranch, where
7 were they.
8 A. They were at my -- some of them were at
9 my -- at the Soto apartment. And most of them were
10 more at my grandmother's house.
11 Q. Now, why would some of them have been at
12 your grandmother's house.
13 A. Because I had to stay with my grandmother,
14 because she needed me.
15 Q. So you were still going to school at --
16 A. Roosevelt.
17 Q. Okay.
18 A. Uh-huh.
19 Q. Why did your grandmother need you.
20 A. Because she had gotten surgery on her ankle.
21 They had to move something - I forgot what it was -
22 and she couldn't really walk. And my grandfather's
23 a truck driver, so she didn't have anybody but me.
24 Her other granddaughter, she lives too far. And I'm
25 her only other granddaughter.
26 Q. Speaking of your grandmother and your
27 grandfather. Your grandfather's a trucker.
28 A. Yeah. 750

1 Q. Who does he work for.
2 A. He works for Ralph's.
3 Q. How long has he done that, to your
4 knowledge.
5 A. Since he was 18 years old.
6 Q. And your grandmother.
7 A. Yes.
8 Q. Does she speak English.
9 A. No. Not at all.
10 Q. But your grandfather does.
11 A. Yeah, he speaks English and Spanish.
12 Q. Now, when -- do you remember how many days
13 it was that you stayed at the Calabasas Inn.
14 A. Three days. Four days. I don't remember.
15 About that.
16 Q. I'm sorry.
17 A. About three days, I think.
18 Q. Do you remember whether you were in the same
19 room the entire time.
20 A. No, we went to another one.
21 Q. So do you remember the room numbers at all.
22 A. No. I just remember one was on top of the
23 other.

24 Q. So one was on a higher floor. They were not
25 on the same floor.
26 A. No.
27 Q. Okay. Let's do it this way: With regard to
28 the first room you went into, was it on the lower 751

1 floor or the higher floor.
2 A. I think it was on the one on the higher
3 floor.
4 Q. And then you went to the one on the lower
5 floor.
6 A. The next floor.
7 Q. Were one of the rooms bigger than the
8 others.
9 A. Yeah.
10 Q. What was the difference.
11 A. One of them had one more bed. Yeah.
12 Q. Did they both have kitchens.
13 A. Yeah, they both had kitchens.
14 Q. And do you know, when you moved floors,
15 whether or not, to your personal knowledge, Vinnie
16 or Frank changed their room.
17 A. Yes.
18 Q. And how did they change their room. I don't
19 mean how. They didn't go downstairs. But, I mean,
20 were they on the same floor as you folks.
21 A. Yes.
22 Q. Now, when you go back -- after Calabasas.
23 You're finished at Calabasas. Okay. Let me just
24 ask you a few more questions about Calabasas.
25 You're at Calabasas. And I saw in that
26 photograph that you identified that it has a kitchen
27 unit.
28 A. Yes. 752

1 Q. Did your mom cook while you were there.
2 A. No.
3 Q. So you didn't use the kitchen unit.
4 A. No.
5 Q. So how did you get your meals.
6 A. They would either bring it to us -- I think
7 one time we did go out to eat. But most of the time
8 everything was brought to us by the bodyguard guy.
9 Q. So you were in your room and they brought
10 the food.
11 A. Yeah.
12 Q. All right. Now, after Calabasas - after you
13 left the Calabasas Inn, okay. - tell the ladies and
14 gentlemen of the jury where you went.
15 A. We went back to Neverland.

16 Q. Back to where.
17 A. Neverland.
18 Q. And how did you get there.
19 A. They took us. Vinnie did.
20 Q. Now, during the time -- let me go back to
21 just one point. During the time that you were at
22 the Calabasas Inn, you've told us that Vinnie was
23 there. Was Frank Tyson ever there.
24 A. Yeah, he came at one point.
25 Q. Do you remember how long he was there for.
26 A. I don't remember. I think a day or two.
27 Q. So it was not on a consistent basis.
28 A. No, it was mostly Vinnie that stood there. 753

1 Q. Okay. When I asked that, I mean, was he
2 there all of that day, or was he in and out that
3 day. To your knowledge, what you saw.
4 A. I don't know. We were in our room.
5 Q. Okay. Fair enough. So you were taken back
6 to the ranch by Vinnie.
7 A. Yes.
8 Q. And when you get back to the ranch, do you
9 remember whether it's dark or whether it's daylight.
10 A. I think it was daylight.
11 Q. And when you got to the ranch, where did you
12 go.
13 A. Went to go put our stuff away. And I went
14 to put my stuff in the room, guest room.
15 Q. So you were back in the guest room.
16 A. Yeah.
17 Q. And your mother.
18 A. She went back to her same room.
19 Q. Now -- and during that period of time, and
20 during that day at some point, did you see Mr.
21 Jackson.
22 A. I don't remember.
23 Q. Do you remember where your brothers were
24 when they got back to the ranch.
25 A. I don't remember seeing them.
26 Q. They weren't with you, in any case.
27 A. Yeah.
28 Q. And you were where. In your room. 754

1 A. Yeah.
2 Q. The entire time.
3 A. No, I went out to go, like, eat and stuff,
4 but -- and go drive around and go to the arcade.
5 Q. Did you see them during that time.
6 A. I don't really remember.
7 Q. Okay. Do you remember an occasion after you

8 came back from Calabasas -- I'll get away from that.
9 At any time while you were at Neverland
10 Ranch, did you ever go on a trip to Toys R Us.
11 A. Yes.
12 Q. Do you remember, in relationship to your
13 time that you spent at Neverland Valley Ranch, when
14 that was.
15 A. I don't remember.
16 Q. I mean, was it like early on, late on, in
17 the middle; do you remember.
18 A. In the middle. And later on. Like
19 somewhere in there.
20 Q. Do you remember who you went with.
21 A. Mr. Jackson. Aldo. Marie Nicole. Gavin.
22 Star. Me. Frank went. Chris, the bodyguard went
23 also, I think.
24 Q. Who.
25 A. Chris, Mr. Jackson's bodyguard also.
26 Q. A guy by the name of Chris.
27 A. Yeah.
28 Q. Okay. 755

1 A. And we had picked up some fans also.
2 Q. Where did you pick up some fans.
3 A. Driving down the road, like before we made a
4 turn. They were on the corner.
5 Q. Is this on the ranch premises or off the
6 premises.
7 A. Off.
8 Q. And how many of them went with you.
9 A. I don't really remember how many there were.
10 I just -- I just remember that one boy.
11 Q. And then you went where. Do you remember
12 what town you went to, to go to Toys R Us.
13 A. I don't remember.
14 Q. How far it was.
15 A. 20 minutes. I don't remember. It wasn't
16 close by, though.
17 Q. I'm sorry.
18 A. It wasn't close by, though.
19 Q. And how long were you there at the store.
20 A. 45 minutes. 30 minutes.
21 Q. What was going on.
22 A. They were just getting toys and we were just
23 shopping.
24 Q. Who was.
25 A. Everybody that went.
26 Q. So everybody was buying things.
27 A. Yeah.
28 Q. What did you buy. 756

1 A. I think I got some roller skates. I think I
2 got roller skates.
3 Q. So after this trip to the toy store, where
4 did you go.
5 A. Back to the ranch.
6 Q. Now, with your brother -- his cancer's been
7 in remission, you said.
8 A. Yes.
9 Q. And to your knowledge, does your brother
10 still have to go back and see the doctor
11 periodically.
12 A. Yes, he does.
13 Q. How often.
14 A. Well, now that they --
15 Q. Let me --
16 A. Back then.
17 Q. Yeah, back then.
18 A. Okay. He would have to go every so many
19 weeks. Because they were monitoring his kidney.
20 Q. And was there something that he had to do in
21 connection with that monitoring.
22 A. Yes, he did.
23 Q. What was that.
24 A. He would have to pee in a bottle for two
25 days or 24 hours, something like that.
26 Q. And have you ever seen this bottle.
27 A. Yes, I have.
28 Q. Could you describe it to us. 757

1 A. It's about this height, of this.
2 Q. Of the water container there.
3 A. Yes. And then it has a thick handle, it's
4 plastic. And it's got a real secure, like, top.
5 Q. Now, while you were at the ranch, did you
6 receive any information - don't tell me what it
7 was - that caused you to go looking for your
8 brothers about the trip to the hospital.
9 A. Yes.
10 Q. From who was it that you got the
11 information.
12 A. My mother.
13 Q. And did you do something as a result of that
14 information.
15 A. Yes.
16 Q. And what did you do.
17 A. I went to Mr. Jackson's -- because there's
18 two doors. A door that goes straight into the room
19 and there's a door that goes into a hallway that
20 goes into his room. That door, I was knocking and
21 pounding on.
22 Q. Okay. When you say "that door," I'm not

23 exactly clear yet. Talk about that again.
24 A. Because there's a door that goes straight
25 into his room. That's the one that has the code on
26 it.
27 Q. Right.
28 A. Then there's a door down -- that's on the 758

1 hallway, in the front of the hallway. That door was
2 locked.

3 Q. Okay.

4 A. So I was pounding on that door.

5 Q. You were pounding on that door. So you
6 never got into the hallway.

7 A. No, it was locked.

8 Q. And did anybody ever come to the door.

9 A. No.

10 Q. Did you go back -- where did you go after
11 that.

12 A. I went to my mom and told her that, "They're
13 not letting me in"; that, "They're not answering."

14 Q. Now, after the -- after -- the day after the
15 incident where you were pounding on the door -
16 okay. - did you see your mother leave the ranch.

17 A. Yeah, her, Gavin and Vinnie were taking
18 Gavin to his doctor's appointment.

19 Q. Did you actually see them leave.

20 A. Yes.

21 Q. Do you know whether it was in the morning or
22 the afternoon or --

23 A. It was in the morning.

24 Q. And did you actually see them get into the
25 car.

26 A. Yes.

27 Q. Did you see whether or not at that point in
28 time Gavin had his bottle full of urine. 759

1 A. Yes.

2 Q. And who was actually physically carrying the
3 bottle at that point.

4 A. I think Gavin was carrying it at the
5 beginning, but he passed it to my mom.

6 Q. Now, did you see where they were seated in
7 the car.

8 A. Gavin was sitting in the back and my mom was
9 in the front and Vinnie was driving.

10 Q. And was it at this point -- when your mom
11 was in the front of the car, could you tell us
12 whether or not she had the bottle at that point.

13 A. I think she did, because right before they
14 got in the car, that's when Gavin passed the bottle

15 to him -- to my mom.
16 Q. So I take it you just saw them drive off.
17 A. Yeah.
18 Q. Now, later that day, did you see your
19 brother Gavin.
20 A. Yes.
21 Q. After he had gone to the hospital.
22 A. Yes.
23 Q. Was he back on the ranch.
24 A. Yes.
25 Q. Did you see him drive up or --
26 A. Vinnie drove him up.
27 Q. Did you see that.
28 A. Yeah. 760

1 Q. So where were you when you saw Vinnie and
2 your brother come back.
3 A. I was in front of the main house.
4 Q. Was your mother with them.
5 A. No.
6 Q. All right. When your brother got out of the
7 car, where did he go.
8 A. I think he went to go look for Mr. Jackson.
9 Q. I'm sorry.
10 A. I think he went to go look for Mr. Jackson.
11 I don't remember.
12 Q. But your mother wasn't there.
13 A. No.
14 Q. Now, during the time that you were at the
15 ranch, and the boys were at the ranch, and Mr.
16 Jackson was at the ranch --
17 A. Yeah.
18 Q. -- talking about that period once you come
19 back from Miami. All right. Just speaking for
20 yourself. Okay. Was there a difference in the
21 relationship between you and your brothers.
22 A. Yes.
23 MR. MESEREAU: Objection; vague.
24 THE COURT: Sustained.
25 Q. BY MR. SNEDDON: You've described yourself
26 to the jury already as a close family, correct.
27 A. Yes.
28 Q. All right. Was there anything that changed 761

1 with regard to that description that you've given
2 the jury about the closeness of the family between
3 you and your brothers.
4 A. Yes.
5 MR. MESEREAU: Objection; vague.
6 THE COURT: Overruled.

7 THE WITNESS: Yes.

8 Q. BY MR. SNEDDON: Would you tell the ladies
9 and gentlemen of the jury what it is.

10 A. Me and my brother are very, very close.

11 When -- during this all, it just felt like he didn't
12 want to be near me. He didn't really want to really
13 talk to me. He didn't really want to talk to me.

14 He didn't want to be near me. It just felt weird.

15 And me being his older sister, I just knew

16 something. I don't know. I don't know. Just felt
17 weird.

18 Q. Anything else about his behavior that
19 changed, that you noticed.

20 A. He didn't really want to talk to me. He was
21 very distant. He just didn't want to even see my
22 mom. He just thought differently.

23 Q. Now, after your brother and Vinnie came back
24 from the hospital trip - okay. - at some point in

25 time after that, did you have a telephone
26 conversation with your mother.

27 A. Yeah.

28 Q. And as a result of the telephone 762

1 conversation with your mother, did you do something.

2 A. Yes.

3 Q. What did you do.

4 A. I packed all of our stuff and I just threw
5 everything together. My stuff was pretty much
6 already together. Just the boys' clothes were
7 everywhere.

8 Q. And what did you do with the boys' clothes.

9 A. Put them back in suitcases.

10 Q. Now, when you talked to your mother on the
11 phone - okay.

12 A. Yeah.

13 Q. - was anybody present with you.

14 A. No.

15 Q. And at any point in time, were you present
16 when your mother was talking to anybody else at the
17 ranch on the phone before you packed your bags.

18 A. I don't remember.

19 Q. Now, when you come out after packing your
20 bags, do you know where you're going.

21 A. I'm going to my grandparents' house.

22 Q. And did anything -- did anything happen when
23 you came out.

24 A. Came out of the ranch, or --

25 Q. No, no, no. You packed your bags, you're
26 going to get a ride, and you're going back to your
27 grandparents' house, right.

28 A. Uh-huh. 763

1 Q. Before you left, did anything happen.
2 A. Yeah.
3 Q. Okay. Tell the jury what happened.
4 A. Well, Vinnie came -- or I think it was Frank
5 came up to me and said, "Just leave that suitcase."
6 And --
7 MR. MESEREAU: Objection; hearsay.
8 MR. SNEDDON: It's offered under 223, Your
9 Honor.
10 THE COURT: All right. It will be
11 conditionally accepted.
12 Q. BY MR. SNEDDON: All right. Lean into the
13 microphone.
14 A. Well, Frank had told me, "Just leave that
15 suitcase." And Gavin said, "Yeah, just leave it."
16 It was Gavin's things in there.
17 Q. And did you leave the suitcase.
18 A. Yeah.
19 Q. And to your knowledge, did you ever get that
20 suitcase back.
21 A. No.
22 Q. You didn't see it come back.
23 A. I don't remember getting it back.
24 Q. When you left the ranch, who left.
25 A. Me and my brothers.
26 Q. Do you know who took you.
27 A. Either Frank or Vinnie. I don't remember.
28 Q. Where did they take you. 764

1 A. To my grandparents' house.
2 Q. When you got to your grandparents' house,
3 who was there.
4 A. My mom and my grandparents. I think Jay was
5 there, too.
6 Q. Who.
7 A. I think Jay was there, too.
8 Q. Now, did you ever go back to Neverland
9 Valley Ranch after that.
10 A. No.
11 THE COURT: Take our afternoon break now.
12 MR. SNEDDON: Thank you.
13 THE COURT: See you tomorrow morning.
14 Remember the admonitions.
15 (The proceedings adjourned at 2:30 p.m.)
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1 REPORTER'S CERTIFICATE

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4 THE PEOPLE OF THE STATE OF)

5 CALIFORNIA,)

6 Plaintiff,)

7 -vs-) No. 1133603

8 MICHAEL JOE JACKSON,)

9 Defendant.)

10

11

12 I, MICHELE MATTSON McNEIL, RPR, CRR, CSR

13 #3304, Official Court Reporter, do hereby certify:

14 That the foregoing pages 585 through 765

15 contain a true and correct transcript of the

16 proceedings had in the within and above-entitled

17 matter as by me taken down in shorthand writing at

18 said proceedings on March 3, 2005, and thereafter

19 reduced to typewriting by computer-aided

20 transcription under my direction.

21 DATED: Santa Maria, California,

22 March 3, 2005.

23

24

25

26

27 MICHELE MATTSON McNEIL, RPR, CRR, CSR #3304

28 OFFICIAL COURT REPORTER 766