

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.)

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14
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16 REPORTER'S TRANSCRIPT OF PROCEEDINGS

17

18 FRIDAY, MARCH 4, 2005

19

20 8:52 A.M.

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22 (PAGES 767 THROUGH 780)

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

28 BY: Official Court Reporter 767

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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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9 PLAINTIFF'S WITNESSES DIRECT CROSS REDIRECT RECROSS

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11 ARVIZO, Davellin 772-S

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1 E X H I B I T S

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3 FOR IN PLAINTIFF'S NO. DESCRIPTION I.D. EVID.

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5 340 Rebuttal Film (Two DVDs) 773 774

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1 Santa Maria, California

2 Friday, March 4, 2005

3 8:52 a.m.

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5 THE COURT: Good morning.

6 THE JURY: (In unison) Good morning.

7 MR. MESEREAU: Good morning.

8 THE COURT: I'll tell you how my day started
9 out so you get a picture of this. Every morning my
10 research attorneys come in and meet with me to see
11 if there's anything that needs to be done. And they
12 came in this morning at eight o'clock. And I said,
13 "Oh, don't worry about a thing, you know, we're
14 ready to go." And then I was told we have motions.
15 So -- and I had to spend some time and that's why
16 you had to wait. So my -- "Okay, everything's all
17 right, it's a go," went like that.

18 (Laughter.)

19 THE COURT: So I apologize for keeping you
20 waiting and we'll get started right now.

21 Are you ready to proceed.

22 MR. SNEDDON: Yes, Your Honor. I am. Thank
23 you.

24 THE COURT: We'll let you use that until it
25 squeals at you.

26 MR. SNEDDON: It does have a mind of its
27 own, I'll tell you that.

28 // 771

1 DAVELLIN ARVIZO
2 Having been previously sworn, resumed the
3 stand and testified further as follows:
4
5 DIRECT EXAMINATION (Continued)
6 BY MR. SNEDDON:
7 Q. Good morning.
8 A. Good morning.
9 Q. You told the ladies and gentlemen of the
10 jury that you and your mother and your brother and
11 your sister (sic) were part of a film that was done
12 at the house of an individual by the name of Hamid
13 Moslehi, correct.
14 A. Yes.
15 Q. And you remember that incident.
16 A. Yes.
17 Q. Now, on that particular evening, do you
18 remember the filming of the -- the actual interview
19 that was done of the family.
20 A. Yes.
21 Q. Did you participate in all of the interview.
22 A. No.
23 Q. What happened -- about how much of it were
24 you involved in; do you recall.
25 A. 20 minutes, half an hour.
26 Q. And was that the first part or the last
27 part.
28 A. I think that was the first part. 772

1 THE COURT: You need to speak a little
2 louder.
3 THE WITNESS: I think that was the first
4 part.
5 Q. BY MR. SNEDDON: That's just perfect. If
6 you can just keep that -- just like that. We can
7 all hear.
8 And when you were no longer a participant in
9 the interview, what, if anything, did you do.
10 A. I don't really remember, but I was just
11 there for like a couple minutes. Like standing on
12 the side.
13 Q. And then what.
14 A. I don't remember. But I don't remember
15 being right there watching.
16 Q. So you didn't stick around and watch it.
17 A. No.
18 Q. Okay. Now, you have seen the footage, the
19 film of the interview itself, correct.
20 A. Yes.
21 Q. Of you and your family.
22 A. Yes.
23 Q. You were asked to review that in connection

24 with your testimony, correct.
25 A. Yes.
26 MR. SNEDDON: Your Honor, at this time I'd
27 like to have marked as People's Exhibit No. 340 for
28 identification, there's two CD disks, or DVD disks, 773

1 I'm sorry, of the rebuttal, what's called the
2 rebuttal, or the Hamid interview. And I think
3 counsel and I would both agree it should come into
4 evidence. Correct.
5 MR. MESEREAU: Yes, the whole tape, Your
6 Honor.
7 THE COURT: All right. It's admitted.
8 MR. SNEDDON: There are two disks in that,
9 Your Honor, and I look the liberty of preloading one
10 of them in the -- and we'll need the Court to
11 activate the "DVD" switch up there on the bench.
12 MR. MESEREAU: Your Honor, may I inquire as
13 to what is coming into evidence. Is it one DVD. Is
14 it the entire exhibit.
15 THE COURT: They can't hear you in the back.
16 THE BAILIFF: Nobody can hear you.
17 MR. MESEREAU: I'm sorry, Your Honor.
18 Your Honor, I'm inquiring as to what exactly
19 Mr. Sneddon is proposing to put into evidence. Is
20 it the entire interview, as recorded, or is it part
21 of it.
22 MR. SNEDDON: Well, at this point, Your
23 Honor, the only part of it I can lay the foundation
24 for is the part involving this witness, because she
25 was not present, as she just indicated, during the
26 latter part of it.
27 THE COURT: At this time you'll just put in
28 the part she can identify. 774

1 MR. SNEDDON: Yes, sir.
2 THE COURT: We'll deal with the other part
3 later.
4 MR. SNEDDON: It's my -- just to satisfy the
5 Court and counsel, it is my understanding that the
6 first DVD that is in the machine now involves the
7 entire family. And that the second one ends
8 somewhere around -- maybe eight or nine or ten
9 minutes into it, it stops, and she is no longer a
10 participant in it, so everybody knows. The first
11 one would be the -- entirely is the family, all of
12 it.
13 MR. MESEREAU: That's not our understanding,
14 obviously.
15 MR. SNEDDON: Well --

16 MR. MESEREAU: Is Mr. Sneddon proposing to
17 use as an exhibit the first DVD and just ten minutes
18 into the second, or is he proposing to use, as an
19 exhibit, both. I don't understand that, Your Honor.
20 THE COURT: I don't either.
21 MR. SNEDDON: I'm only proposing to use what
22 I can personally lay a legal foundation for. And
23 that is the first part of the first tape of the DVD
24 and that portion in which this witness was a
25 participant and knew something about. I can't ask
26 her to authenticate something she's never seen.
27 THE COURT: You aren't answering the
28 question, though. 775

1 Does that involve all of the first DVD and
2 part of the second DVD.
3 MR. SNEDDON: Yes, Your Honor.
4 THE COURT: Does that answer your question.
5 MR. MESEREAU: It does, Your Honor.
6 MR. SNEDDON: I apologize if I didn't make
7 that clear.
8 All right. At this time, Your Honor, with
9 the Court's permission and counsel's permission, I
10 propose to play the first of the DVDs.
11 THE COURT: All right.
12 MR. MESEREAU: No objection.
13 MR. SNEDDON: Your Honor, excuse me just a
14 second.
15 THE COURT: Yeah.
16 MR. SNEDDON: Should we have the witness
17 come down to view it, like we did Mr. Bashir, or
18 would you prefer she just stay there.
19 THE COURT: Depends on how well she can see
20 it from --
21 MR. SNEDDON: Okay. Why don't you try
22 looking at it. If you have a hard time seeing it,
23 let us know. Okay.
24 THE WITNESS: Okay.
25 THE COURT: Are you going to question her
26 while it's being played.
27 MR. SNEDDON: I am not. I am going to allow
28 the thing to play in its entirety that involves 776

1 her.
2 THE COURT: All right.
3 MR. SNEDDON: There will be one break simply
4 to change the CDs.
5 THE COURT: Which input should that be.
6 THE BAILIFF: Four.
7 (Whereupon, a portion of People's Exhibit

8 No. 340, Disk 1, was played for the Court and jury.)
9 MR. MESEREAU: Excuse me, Your Honor. We
10 can't hear what's said. Can we request it be
11 started again.
12 THE COURT: All right. I couldn't hear it
13 either. Do you want to start it over.
14 MR. SNEDDON: Your Honor.
15 THE COURT: Yes.
16 MR. SNEDDON: Apparently the volume would
17 need to go up louder, but the technician told Mr.
18 Auchincloss if he turned it up any louder that we'd
19 get a lot of screeching.
20 MR. AUCHINCLOSS: I can try it, Your Honor.
21 THE BAILIFF: I'm calling right now the
22 technician.
23 THE COURT: Well, we can't hear it.
24 MR. SNEDDON: I understand that. I had no
25 way of knowing that before we activated it.
26 MR. AUCHINCLOSS: I think if we turn off
27 these microphones, it stops the feedback loop and we
28 can turn it up. 777

1 THE COURT: All right. Everyone turn off
2 your mikes.
3 (Whereupon, a portion of People's Exhibit
4 No. 340, Disk 1, was played for the Court and jury.)
5 (Off-the-record discussion held at counsel
6 table.)
7 MR. SNEDDON: Your Honor, I believe what
8 happened, there's an overlap between the first and
9 the second CDs and that this is the overlap. This
10 did not appear in the home version.
11 Your Honor, may the record reflect that we
12 have stopped the first disk at 3106 and I would
13 propose to put the second disk in at this time.
14 THE COURT: All right.
15 MR. SNEDDON: I'm willing, if counsel, which
16 I think he does, would waive the foundation for the
17 second part. We'll just play this whole disk all
18 the way to the end.
19 MR. MESEREAU: That's acceptable, Your
20 Honor.
21 THE COURT: All right. I'll approve that
22 stipulation. And the whole second disk will be
23 played without further foundation.
24 (Whereupon, a portion of People's Exhibit
25 No. 340, Disk 2, was played for the Court and jury.)
26 THE COURT: Can you cut it there. We'll take
27 a break.
28 MR. SNEDDON: Your Honor, for the record, 778

1 that would be at 9.39 on the tape.
2 (Recess taken.)
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1 REPORTER'S CERTIFICATE
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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 771 through 779
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 4, 2005, and thereafter
20 reduced to typewriting by computer-aided
21 transcription under my direction.
22 DATED: Santa Maria, California,

www.mjfacts.info

23 March 4, 2005.
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25
26
27 MICHELE MATTSON McNEIL, RPR, CRR, CSR #3304
28 SUPERIOR COURT OF THE STATE OF CALIFORNIA 780

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

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21 (PAGES 781 THROUGH 959)

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26 REPORTED MICHELE MATTSON McNEIL, RPR, CRR, CSR #3304
27 BY: Official Court Reporter
28 781

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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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9 PLAINTIFF'S WITNESSES DIRECT CROSS REDIRECT RECROSS
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11 ARVIZO, Davellin 798-M
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1 E X H I B I T S

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3 FOR IN DEFENDANT'S NO. DESCRIPTION I.D. EVID.
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5 5000 Audiotape of Bradley Miller interview 933 934
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1 THE COURT: All right.
2 MR. SNEDDON: We'll continue with the tape
3 at this point.
4 THE COURT: All right.
5 (Whereupon, People's Exhibit 340, Disk 2, was
6 played to its conclusion for the Court and jury.)
7 MR. SNEDDON: Your Honor, may the record
8 reflect that it ends at 30:28.
9 THE COURT: All right.
10 MR. SNEDDON: I think we can clear the --
11 THE BAILIFF: Can you turn the microphone
12 back on.
13 Q. BY MR. SNEDDON: Miss Arvizo, with regard to
14 the tape we just saw, the exhibit, People's 340 -
15 okay. --
16 A. Yes.
17 Q. -- I asked you about when you were in Miami.
18 Remember that.
19 A. Yes.
20 Q. At the hotel there.
21 A. Yes.
22 Q. And I believe you told us yesterday that you
23 were not allowed to watch the Bashir tape in Miami.
24 A. Yes.
25 Q. Now, prior to seeing this film itself -- let

26 me put it this way: From the point that this was
27 made at Mr. Moslehi's house on the night that you
28 videoed it - okay. - between the time you were in 785

1 Miami and the time that you went for the filming of
2 this particular thing, had you ever seen the Bashir
3 documentary.

4 A. Never.

5 Q. And from the time -- when was the first time
6 that you saw it.

7 A. I've never seen it to this day. I've only
8 saw what, like, the press has aired, like the one
9 little spot. But I've never seen it.

10 Q. Now, to your knowledge, in your presence,
11 from the time that you were in Miami to the time
12 that this film was made that we just saw, did your
13 mother ever see the Bashir documentary.

14 A. No.

15 Q. There's a statement in this video that says
16 that you had full access to Michael Jackson, 24
17 hours a day, seven days a week. Is that a true
18 statement.

19 A. Me. No.

20 Q. Let me ask you a few other questions about
21 Miami, so we can go back and focus on Miami. Okay.

22 A. Okay.

23 Q. Just a couple.

24 When you left to go to Miami, did you have
25 an understanding with regard to how long you were
26 going to be gone.

27 A. No.

28 Q. When you packed your belongings to go on the 786

1 trip, how many days' clothing did you take; do you
2 recall.

3 A. A couple of days.

4 Q. Now, when you got to Miami, you told us that
5 on the day after you arrived, you were in Mr.
6 Jackson's room all day that day. Correct.

7 A. Yes.

8 Q. Did anybody at that time tell you that you
9 couldn't leave.

10 A. Well, they just had us in the room. They
11 didn't really say, "You go anywhere." We had asked
12 to go to the beach one time, and they just kept
13 saying, "We'll do it later; we'll do it later."

14 Q. And who said that.

15 A. We'd ask Frank, and that's all I remember
16 who we would ask.

17 Q. "Frank" meaning Frank --

18 A. Tyson. Mr. Tyson.
19 Q. Now, let's go back to the time that we're
20 talking about; you were at the ranch, at Neverland
21 Ranch. Okay.
22 A. Okay.
23 Q. Were you, at any time while you were on the
24 ranch, you personally - okay. - told anything about
25 any threats.
26 A. Like --
27 MR. MESEREAU: Objection. Vague; and
28 hearsay. 787

1 MR. SNEDDON: I didn't ask her what they
2 said, Your Honor. I'm just trying to lay a
3 foundation, there was some conversations.
4 THE COURT: The question is ambiguous. I'll
5 sustain the objection.
6 Q. BY MR. SNEDDON: From the time that you got
7 back to the ranch, Neverland Valley Ranch, after you
8 left Miami - okay. - until the time that you left to
9 go to your grandparents' house - okay. - did you
10 ever have a conversation with anyone at the ranch
11 about threats.
12 A. Yes.
13 Q. And with whom did you have that
14 conversation.
15 A. With Dieter and Frank.
16 Q. All right. With regard to Dieter, do you
17 recall when those conversations took place.
18 A. They were before the rebuttal video, but I
19 don't know when.
20 Q. And do you recall what Dieter told you about
21 threats.
22 A. He said there were death threats on us.
23 Q. Do you recall what else he said, if
24 anything, about that.
25 A. I don't remember. It's too long ago.
26 Q. Okay. And you said, I believe, that there
27 was somebody else who talked to you about threats.
28 A. Yes. 788

1 Q. And who was that.
2 A. Mr. Tyson.
3 Q. All right. What did Mr. Tyson say to you.
4 A. He said the same thing; that there was death
5 threats on us.
6 Q. With regard to either one of those two
7 individuals, did they ever say that there were
8 threats against your family, threatened your family.
9 A. That's what the death threats were, were on

10 our family.
11 Q. Now, with regard to the trip to Brazil -
12 okay. - did you ever have a conversation on the
13 ranch between the time that you had arrived there
14 from Miami till the time that you eventually left
15 for the last time, did you have a conversation with
16 Mr. Tyson about your mother and the trip to Miami.
17 A. Yes.
18 Q. And what did Mr. Tyson say to you in that
19 connection.
20 MR. MESEREAU: Objection; hearsay.
21 MR. SNEDDON: Offered for the same reason.
22 1223.
23 THE COURT: I'll admit it conditionally under
24 the instructions previously given to you.
25 THE WITNESS: He just said that my mom was
26 being really difficult, that I need to talk to her,
27 she's not cooperating, and stuff like that.
28 Q. BY MR. SNEDDON: Did he call her a name. 789

1 A. Yeah, he called her a "B," b-i-t-c-h.
2 Q. Did he spell it for you or did he just say
3 it.
4 A. He said it.
5 Q. Do you recall whether that statement was
6 made to you before or after the filming of the
7 rebuttal.
8 A. I think it was after the rebuttal.
9 Q. And do you recall where you were when you
10 had that conversation with Mr. Tyson.
11 A. All I remember is I was sitting down. I
12 don't remember where it was at.
13 Q. Okay. Let me take you to the point where we
14 were yesterday when we took our recess. Okay. I
15 believe you indicated that you'd packed the bags,
16 and then you had then left the ranch and gone to
17 your grandparents.
18 A. Yes.
19 Q. Now, when you left the ranch and you went to
20 your grandparents' place - okay. - did you go back
21 to school.
22 A. Yes.
23 Q. And what school did you go back to.
24 A. Mountain View High School.
25 Q. And while you were going to Mountain View
26 High School, with whom did you live with.
27 A. My grandparents.
28 Q. Now, when you left the ranch, you went back 790

1 to school, and you were in high school at this

2 point, correct.

3 A. Yes.

4 Q. Did anything happen to you within a few days
5 of leaving the ranch with regard to your comings and
6 goings at school.

7 A. Yes.

8 Q. Would you tell the ladies and gentlemen of
9 the jury what happened.

10 A. I was walking home from school, because my
11 school, the Mountain View High School, is only a few
12 blocks from my grandmother's house. And about the
13 block right before I got to my grandmother's house,
14 a black car pulled up to me, and it was one of
15 Mr. Jackson's bodyguards. He tried to ask me how --
16 MR. MESEREAU: Objection; hearsay.

17 MR. SNEDDON: Offered for the same purpose,
18 Your Honor.

19 THE COURT: Accepted conditionally.

20 THE WITNESS: He said, "Oh, how are you
21 doing." He was fidgeting a lot, like under the car.
22 I couldn't see what was going on. I was just really
23 trying to get really quick, and I said, "I got to
24 go, I got to go." And I just, like, walked really
25 fast to my grandmother's gate. And when I was
26 closing the gate, I looked back and he was
27 videotaping me.

28 Q. BY MR. SNEDDON: Did you ever have any other 791

1 contact with that individual.

2 A. Yes.

3 Q. What was that.

4 A. This was the night before that incident with
5 him driving next to me. I was laying down in my
6 grandmother's room. This is the room that Gavin
7 used to sleep in. It faces towards the outside and
8 it has a big window.

9 All of a sudden, I heard rocks that were
10 falling on the roof, like someone was throwing them.
11 And I ran to my grandmother and I said, "Somebody's
12 throwing rocks." And we went to the front door, and
13 we just opened, like, the wood door, and we had the
14 screen door closed.

15 And then all of a sudden, one of the rocks
16 hit the glass. And my grandma screamed, "Hey," and
17 she ran out. And I ran to go get my shoes to run
18 out, too.

19 And I -- all I saw was the guy running to
20 his car and take off. And it was the same car that
21 I had seen the next day, so it was him.

22 Q. Now, at some point after you're back at your
23 grandmother's, the -- did your brother Gavin's
24 suitcase arrive from the ranch.

25 A. Yes, I think it did.
26 Q. And were you there when that happened.
27 A. No, I didn't -- I got to see it afterwards,
28 but I didn't see when it arrived. 792

1 Q. Okay. But was it still closed when you
2 arrived.
3 A. No. It was open. My mom and everybody had
4 went through it to see what was there.
5 Q. Okay. And so your mother did that.
6 A. Well, yeah, with Gavin.
7 Q. Okay. But you weren't there when they did
8 it.
9 A. No.
10 Q. Okay. Fine.
11 Have you ever -- have you ever heard of the
12 name Marc Schaffel.
13 A. Yes.
14 Q. And how have you heard of that name.
15 A. They just said that -- well, Frank would
16 tell us that --
17 MR. MESEREAU: Objection; hearsay.
18 MR. SNEDDON: Offered under 1223, Your
19 Honor.
20 THE COURT: It's -- all right. I'll admit it
21 under the conditional limitation that I have.
22 MR. SNEDDON: Okay.
23 THE WITNESS: Frank had just told us that it
24 was one of Michael's friends, and he was helping
25 him. I didn't know anything else.
26 Q. BY MR. SNEDDON: Had you ever been to Mr.
27 Schaffel's house.
28 A. We saw the outside of it. Frank and Vinnie 793

1 had drove over there with us on the car and he told
2 us to stay in the car.
3 Q. And did they then go into the house.
4 A. They went into the house.
5 Q. Came back out.
6 A. Yes.
7 Q. Now, you told the ladies and gentlemen
8 yesterday that while you were on the ranch, that, in
9 your opinion, there was some change in your
10 brother's behavior. Remember that.
11 A. Yes.
12 Q. Now, at the point where you -- the family
13 was back off the ranch, now, for the last time --
14 okay. --
15 A. Yes.
16 Q. -- did your brother's behavior change in any

17 respect from the way you described it.
18 A. Yeah.
19 Q. What was that.
20 A. Gavin's a very affectionate little boy. He
21 loves to be kissed, he loves to be held, just
22 everything, his big sister.
23 MR. MESEREAU: Objection; this is asked and
24 answered.
25 THE COURT: Sustained.
26 MR. SNEDDON: This is a different point in
27 time. This is not on the ranch anymore. This is
28 after they left the ranch. 794

1 THE COURT: When was the point in time she
2 was talking about yesterday.
3 MR. SNEDDON: On the ranch. She was talking
4 about the isolation and the changes she saw on the
5 ranch. Now she's talking about what happened after
6 they left the ranch.
7 MR. MESEREAU: If I may, Your Honor, I think
8 they said they were back and forth many times.
9 THE COURT: The objection is sustained.
10 Q. BY MR. SNEDDON: Yesterday, when we were
11 talking about how things were on the ranch -
12 okay. --
13 A. Yes.
14 Q. -- and when you didn't see too much of your
15 brothers at that point in time --
16 A. Yeah.
17 Q. -- was the description that you gave your
18 brother at that time and the changes that you saw,
19 were those the changes that occurred on the ranch or
20 after the ranch.
21 A. On the ranch, he was more separate from me
22 and stuff. But when we were at my grandmother's
23 house, I saw a lot more of how much he had changed.
24 MR. SNEDDON: Your Honor, with the Court's
25 permission, I'd like to go into that.
26 THE COURT: You may.
27 MR. SNEDDON: All right.
28 Q. Now, would you describe to the ladies and 795

1 gentlemen of the jury what changes that you
2 observed, after he left the ranch, in Gavin's
3 behavior.
4 A. He didn't want nobody to talk to him. He
5 didn't want to be hugged. He didn't want to be
6 kissed. He didn't want to do nothing. He just
7 wanted to be by himself. He didn't want to talk to
8 me. He didn't want to talk to anybody. It just

9 hurts, because I'm his older sister.
10 Q. Okay. Do you have some water up there.
11 A. Uh-huh.
12 Q. Go ahead. Take a drink of water. We got
13 all kinds of time.
14 A. Okay.
15 Q. Okay now. Okay. I'm almost done.
16 A. Okay.
17 Q. I want to take you back to the time that you
18 were on the ranch. Okay.
19 A. Okay.
20 Q. And I want to ask you, at any time while you
21 were on the ranch, between the time that you arrived
22 there from Miami till the time that you left for the
23 last time to your grandparents - okay. --
24 A. Okay.
25 Q. -- did you ever see anything with regard to
26 the defendant in this case, Mr. Jackson, touching
27 your brother Gavin in an inappropriate way.
28 MR. MESEREAU: Objection. Leading; move to 796

1 strike.
2 THE COURT: Overruled.
3 You may answer.
4 THE WITNESS: He would constantly be --
5 Q. BY MR. SNEDDON: Just "Yes" or "No."
6 A. Yes.
7 Q. Okay. Now, where was that when you saw it.
8 A. Well, he would be constantly hugging Gavin
9 and kissing him. So anytime I saw them, really.
10 Q. Now, when you say "hugging" and "kissing,"
11 what do you mean by "kissing".
12 A. On the cheek or on the head.
13 Q. Did you -- were there any other occasions
14 that you remember that you saw things that you
15 thought were inappropriate.
16 MR. MESEREAU: Objection; leading.
17 THE COURT: It's overruled.
18 You may answer.
19 THE WITNESS: Well, when I was in the
20 bedroom that one time.
21 Q. BY MR. SNEDDON: What did you see on that
22 occasion.
23 A. Well, he had his arm, and Gavin was laying
24 on his arm like this, and they were just hugging
25 over and over. And he just was kissing him over and
26 over on his head and --
27 MR. SNEDDON: All right. Thank you very
28 much. 797

1 THE COURT: Okay. Cross.
2 MR. MESEREAU: Yes, please, Your Honor. May
3 I just take a second to bring something up.
4 THE COURT: Yes.
5 MR. MESEREAU: Thank you.
6 MR. SNEDDON: Would you mind if I got my
7 water, Your Honor, by walking around. Thank you.
8 MR. MESEREAU: May I proceed, Your Honor.
9 THE COURT: Yes.
10 MR. MESEREAU: Thank you.
11
12 CROSS-EXAMINATION
13 BY MR. MESEREAU:
14 Q. Good morning.
15 A. Good morning.
16 Q. Ms. Arvizo, we've never met before, right.
17 A. No.
18 Q. We've never spoken either on the telephone
19 or anywhere else, right.
20 A VOICE FROM THE AUDIENCE: Louder.
21 THE BAILIFF: Please, louder.
22 MR. MESEREAU: I don't think --
23 MR. SANGER: Just hit the tip of it.
24 THE COURT: Just talk into it.
25 MR. MESEREAU: Hello, hello.
26 THE COURT: Back there, in the front row that
27 was signalling, you okay now.
28 MR. MESEREAU: Hello. 798

1 THE COURT: They're hearing you now.
2 MR. MESEREAU: Okay. Thank you, Your Honor.
3 Let me start again.
4 Q. We have never met before, correct.
5 A. No.
6 THE COURT: Now they can't hear you.
7 Q. BY MR. MESEREAU: We've never met before,
8 right.
9 A. No.
10 Q. And we've never spoken either by telephone
11 or in person, correct.
12 A. No.
13 Q. Okay. Miss Arvizo, my name is Thomas
14 Mesereau, and I just want you to know I speak for
15 Mr. Jackson. Okay.
16 A. Okay.
17 Q. If I ask you any question and you don't
18 understand it, please don't answer it. Just tell me
19 you don't understand. Okay.
20 A. Okay.
21 Q. If anything I say is unclear, just don't
22 answer. Just tell me, "It's unclear. Would you
23 please rephrase it." Just don't answer - okay. -

24 unless you really understand it. Is that okay.
25 A. That's fine.
26 Q. All right. Now, yesterday you were asked by
27 the prosecutor if you recalled a meeting at Mr.
28 Jay Jackson's home with three social workers; do you 799

1 remember that.
2 A. The meeting with the three social workers, I
3 remember that, yes.
4 Q. And they were three women from the Los
5 Angeles Department of Children & Family Services,
6 correct.
7 A. Yes, that's what they told me.
8 Q. And you were at that meeting, right.
9 A. Yes.
10 Q. And you were interviewed at that meeting --
11 A. Yes.
12 Q. -- right. And that meeting took place after
13 the rebuttal video, that was just shown, was filmed,
14 right.
15 A. Yes.
16 Q. In fact, your family went from Mr. Moslehi's
17 home, where the rebuttal was filmed, to Jay
18 Jackson's home, right.
19 A. Yeah, it was like 4:00 in the morning.
20 Q. Okay. 4:00 in the morning, you went to Jay
21 Jackson's home, correct.
22 A. Yes.
23 Q. And that's Major Jay Jackson of the United
24 States Army, true.
25 A. Yes.
26 Q. And your mother was living with him at the
27 time, correct.
28 A. Well, they would sleep over. They weren't 800

1 officially living there, yeah.
2 Q. Well, correct me if I'm wrong, didn't your
3 mother spend more time living there than the Soto
4 address at that point.
5 A. It was kind of even.
6 Q. Okay. Okay. Did you live at Jay Jackson's
7 home at that point in time.
8 A. No, I would go from -- I would visit there.
9 And I would stay at the Soto apartment and I would
10 visit with my grandparents, because they needed me.
11 Q. Okay. When the meeting with the three
12 social workers from the Los Angeles Department of
13 Children & Family Services took place, where were
14 you living primarily.
15 A. Mostly with my grandparents, because she

16 really needed me.
17 Q. Okay. So you were spending most of the time
18 in El Monte at that point, correct.
19 A. Yes.
20 Q. Your mother was sort of splitting time
21 between Soto Street and Jay Jackson's home, right.
22 A. This is what I can remember, yes.
23 Q. Okay. But the meeting with the three social
24 workers was at Major Jackson's home, right.
25 A. Yes.
26 Q. And you went right from Mr. Moslehi's home,
27 where the video that was just shown was filmed, to
28 Jay Jackson's home for the interview, right. 801

1 A. Yes, because it was closer.
2 Q. And who drove you from Mr. Moslehi's home to
3 Major Jackson's home for that interview.
4 A. I think it was Vinnie.
5 Q. Okay. Did he drive all four of you to Major
6 Jackson's home.
7 A. From what I remember, yes.
8 Q. Okay. Now, that interview with the three
9 social workers, was their desire -- excuse me, let
10 me rephrase that.
11 The interview with the three women from the
12 Los Angeles Department of Children & Family Services
13 took place because they were investigating whether
14 or not Mr. Jackson had done anything wrong and
15 whether or not your mother was fit to be a parent,
16 right.
17 MR. SNEDDON: Your Honor, I'm going to
18 object.
19 THE WITNESS: I didn't know --
20 MR. SNEDDON: I'm going to object. Lack of
21 foundation that she even knows what the reason for
22 the meeting was.
23 MR. MESEREAU: I'll be happy to go into
24 that. I'll withdraw the question, Your Honor.
25 Q. Do you know why the meeting with the three
26 social workers took place.
27 A. I didn't know.
28 Q. Did you talk about that meeting with anyone 802

1 before you attended it.
2 A. Um, I think so. I forgot who it was, but
3 they had just said, "Just say nice things."
4 Q. But your mother asked you to do that also,
5 didn't she.
6 A. I don't remember her asking me to say
7 anything.

8 Q. Well, but they were investigate -- I mean,
9 did you think they were investigating your mother at
10 that time.
11 A. I don't know.
12 MR. SNEDDON: I'm going to object; calls for
13 speculation.
14 THE COURT: She said, "I don't know." She
15 did answer the question.
16 Q. BY MR. MESEREAU: Okay. At that meeting,
17 you said nice things about Mr. Jackson, right.
18 A. Yes.
19 Q. And you said those things because you meant
20 them, right.
21 A. Kind of.
22 Q. Well, do you remember appearing before a
23 grand jury in Santa Barbara County.
24 A. Yes, I do.
25 Q. Didn't you tell the grand jury in Santa
26 Barbara County that you meant exactly what you said
27 about Mr. Jackson.
28 A. Well, yes. 803

1 Q. You didn't say these nice things about
2 Mr. Jackson because someone else asked you to,
3 correct.
4 A. Well, that's why I say "I don't know,"
5 because things -- I just remember later on.
6 Q. Well, let me just try and explore that a
7 little bit.
8 A. Okay.
9 Q. You told the Santa Barbara Grand Jury that
10 you said nice things about Mr. Jackson, right.
11 A. Yes.
12 Q. And you were asked by the prosecutor why you
13 said those things, right.
14 A. Yes.
15 Q. You said you said those things because you
16 felt that way towards Mr. Jackson, right.
17 A. At that moment in time I did, yes.
18 Q. So you didn't say the things you said about
19 Mr. Jackson because somebody had told you to say
20 those things, correct.
21 A. I really don't remember. It's so long ago.
22 I mean, I can't remember every little detail.
23 Q. But do you remember that meeting at all.
24 A. There was so many meetings. I don't
25 remember.
26 Q. You don't remember the meeting at Jay
27 Jackson's house with the three social workers.
28 A. I remember that, yes. 804

1 Q. Do you remember who was at the meeting.
2 A. It was me -- who first arrived was Aja and
3 her little baby, and then Mr. Jackson's bodyguard.
4 And then the three ladies.
5 Q. And did Aja arrive by herself or did someone
6 bring her there, to your knowledge.
7 A. She drove over there.
8 Q. So Aja drove to Jay Jackson's home with her
9 child, right.
10 A. Yes.
11 Q. And Aja is Actor Chris Tucker's girlfriend
12 at the time, right.
13 A. Yes.
14 Q. And do you know why Aja drove to Jay
15 Jackson's home at that point.
16 A. For support. She's our very close friend.
17 Q. Okay. Is she still your close friend.
18 A. No. Well, how can -- all this is causing
19 friction. Nobody knows what to think.
20 Q. Okay. But is she still your close friend.
21 A. We don't talk to her right now, no.
22 Q. Do you talk to Chris Tucker at all at the
23 moment.
24 A. Not right now.
25 Q. When did you last talk to Chris Tucker, if
26 you remember.
27 A. Don't remember.
28 Q. When did you last talk to Aja. 805

1 A. When I was at the rebuttal film.
2 Q. Now, you testified yesterday that you saw
3 the three social workers arrive, right.
4 A. Yes.
5 Q. You were there when they came into your --
6 to Jay Jackson's apartment, right.
7 A. Yes.
8 Q. And did you introduce yourself to them.
9 A. Yeah.
10 Q. Did your mother introduce herself to them.
11 A. Yes.
12 Q. And did your brothers introduce themselves
13 to the three social workers.
14 A. Yes.
15 Q. And had you discussed with your mother
16 before that meeting anything that you were going to
17 say at the meeting.
18 A. I don't remember that, no.
19 Q. You don't remember that at all.
20 A. No.
21 Q. Do you remember discussing what you were
22 going to say at that meeting with anyone.

23 A. I don't remember.
24 Q. Don't remember at all.
25 A. No.
26 Q. Okay. Well, you said yesterday you
27 remembered somebody with a tape-recorder in another
28 room, or something that looked like a recorder, 806

1 correct.

2 A. Yes.

3 Q. Had you gone over that question and answer
4 with the prosecutor before you testified.

5 A. Well, yeah, when they first asked me what it
6 was.

7 Q. And approximately when was that.

8 A. I don't remember.

9 Q. Did you meet with any member of the
10 prosecution team last night.

11 A. No. Not last night, no.

12 Q. Did you meet with any member of the
13 sheriff's department last night.

14 A. No.

15 Q. Did you meet with any attorney last night.

16 A. No.

17 Q. At any point, did you discuss how much of
18 that rebuttal video you were present at with anyone
19 from the prosecution team.

20 A. No.

21 Q. Well, at some point did you tell Mr. Sneddon
22 or anyone associated with Mr. Sneddon that you were
23 gone for part of what appeared on that tape.

24 A. Well, when I was at the rebuttal, I knew
25 there was a moment that I wasn't there, because I
26 was there.

27 Q. When did you last discuss that with any
28 member of the prosecution team. 807

1 A. I -- I called someone and told them that I
2 wasn't in the next part and asked them if I was
3 going to be asked about that, because I don't know.

4 Q. And when did you make that call.

5 A. Last night.

6 Q. And who did you call.

7 A. Steve Robel.

8 Q. And he's a Santa Barbara Sheriff.

9 A. Yes.

10 Q. Did he call you or did you call him.

11 A. I called him. Because I was concerned,
12 because I didn't want to be questioned on something
13 I don't know about.

14 Q. Well, how did you know the rebuttal tape was

15 going to be shown today.
16 A. Well, because they gave me the CD to review
17 so I could refresh my memory. Nobody was sitting
18 there with me.
19 Q. And who was "they".
20 A. Well, Steve Robel brought it over to me, and
21 I reviewed it.
22 Q. Was that last night.
23 A. Yes.
24 Q. Did he bring it to your home.
25 A. He brought it to where I was staying at.
26 MR. SNEDDON: I'm going to object to that
27 question, as to where the witness is, for purposes
28 of security and safety. 808

1 MR. MESEREAU: I'm not -- I object to Mr.
2 Sneddon's statement, that he's suggesting things
3 that aren't true, Your Honor. But I'm not going to
4 ask her her address anyway.
5 MR. SNEDDON: You asked where the home was.
6 THE COURT: No, he didn't.
7 MR. MESEREAU: No, I didn't.
8 THE COURT: Read the question back.
9 The objection is overruled. He didn't ask
10 that. You misheard.
11 Read the question back.
12 (Record read.)
13 THE COURT: Okay.
14 Q. BY MR. MESEREAU: And did you have a
15 discussion with this sheriff last night.
16 A. No, he just handed me the CD.
17 Q. Did he say anything to you at all.
18 A. No.
19 Q. Did he tell you it was likely to be shown
20 today.
21 A. Well, he said it was kind of going to be
22 shown eventually, so they just wanted me to review
23 it.
24 Q. And was that all he said.
25 A. Yeah.
26 Q. Did you ever meet with any member of the
27 prosecution team to discuss what you were going to
28 say in court in this case. 809

1 A. Yeah, we did meet once or twice.
2 Q. And who did you meet with.
3 A. Mr. Sneddon.
4 Q. And when did that take place.
5 A. Couple of days ago. Don't remember.
6 Q. And did he come to where you were staying.

7 A. No, I went to where he was.
8 Q. Did someone pick you up and bring you to see
9 Mr. Sneddon.
10 A. Yes.
11 Q. And who was that, if you know.
12 A. I think it was Steve Robel's wife.
13 Q. Okay. And was anyone in the meeting besides
14 you and Mr. Sneddon.
15 A. Mr. Robel would come in and out, but it was
16 mainly me and Mr. Sneddon.
17 Q. And was any other prosecutor there; do you
18 know.
19 A. No.
20 Q. Just you and Mr. Sneddon at times, and no
21 one else present.
22 A. No.
23 Q. Do you know if that conversation was
24 recorded.
25 A. No.
26 Q. Did anyone tell you it was going to be
27 recorded.
28 A. No. 810

1 Q. How long did that meeting with Mr. Sneddon
2 take place.
3 A. Like 15 minutes.
4 Q. Only 15 minutes.
5 A. Yeah.
6 Q. Did you discuss what you were going to be
7 asked in court.
8 A. No. He just -- he just helped me refresh my
9 memory.
10 Q. Now, how did he help you refresh your
11 memory.
12 A. They just gave me what I said.
13 Q. Do you mean police reports.
14 A. No.
15 Q. Would it be transcripts.
16 A. Yes.
17 Q. Did he tell what you transcripts he was
18 giving you to read.
19 A. Just of the grand jury, and that's all I
20 remember. That's the only one.
21 Q. Okay. And did he give you any materials to
22 take home with you.
23 A. Well, that.
24 Q. Okay. So you took the transcript home with
25 you that Mr. Sneddon gave you.
26 A. Yes.
27 Q. And that was your grand jury testimony.
28 A. Yes. 811

1 Q. And did you read it.
2 A. Yes.
3 Q. Okay. Did you read anything else to prepare
4 for your testimony in court.
5 A. I don't remember.
6 Q. Okay. How many times have you met with
7 Mr. Sneddon regarding this case.
8 A. Four times. Five times.
9 Q. And can you recall approximately when those
10 meetings were.
11 A. I don't remember. But it wasn't till a
12 while.
13 Q. Have they been in the last year.
14 A. Well, those two meetings that I had with
15 him, but I don't remember.
16 Q. At your meetings with Mr. Sneddon, other
17 than the one you just described, has anyone else
18 been present.
19 A. At the beginning, they were the sheriff's
20 department talking to us.
21 Q. Okay. How about the other meetings.
22 A. It was mainly just the officers.
23 Q. Other than the last meeting you described
24 where Mr. Sneddon was meeting with you at times
25 alone, have you ever met with him alone before.
26 A. No.
27 Q. Was that the first time he ever met with you
28 alone. 812

1 A. I mean, there was no door. I mean, they
2 could walk in and out. There was a kitchen right in
3 front of us. It wasn't like restricted.
4 Q. I didn't ask you that. But I just want to
5 ask you if that was the only meeting you ever had
6 with Mr. Sneddon where you spent a lot of time with
7 him alone.
8 A. It was --
9 MR. SNEDDON: Objection. The classification
10 is it was "a lot of time." She described it as 15
11 minutes. It's a misstatement of the testimony. I
12 object.
13 THE COURT: Overruled.
14 You may answer.
15 THE WITNESS: It wasn't a lot of time.
16 Q. BY MR. MESEREAU: Okay. Is that the only
17 time that you ever met with Mr. Sneddon alone to
18 talk about your testimony.
19 A. It wasn't alone. Mr. Robel would come in.
20 And time alone with Mr. Sneddon was like five
21 minutes, if you count the time that Mr. Robel was

22 there.
23 Q. Okay. Did you time it.
24 A. No. I mean, it was a short time. It was
25 just practically there, sat down, "Are you feeling
26 okay." You know, that's it.
27 Q. Has Mr. Sneddon ever had what looked like an
28 outline in front of him that he asked you questions 813

1 from.
2 A. Well, yeah. He had just -- I don't know.
3 Q. Did he have a pad in front of him.
4 A. He had paperwork in front of him, but I
5 don't know what it was.
6 Q. Did he ask you questions from the paperwork.
7 A. Not in the last two days. He would just ask
8 me questions.
9 Q. Okay. Now, you say, "The last two days."
10 Did you talk to him more than once during the last
11 two days.
12 A. No. Well -- no, I've only met with him two
13 times during this whole time that I've been here.
14 Q. Has anyone else asked you questions during
15 the last two days.
16 A. No.
17 Q. Well, why did you say the last two dates.
18 A. I was thinking about the last two meetings,
19 not the last two days. Because we didn't even meet
20 at all yesterday. We didn't meet at all the day
21 before, so --
22 Q. Have you met with any member of the Santa
23 Barbara Sheriffs in the last two days, other than
24 Mr. Robel last night.
25 A. No.
26 Q. Has anyone called you on the phone to talk
27 about what you were going to say in court.
28 A. No. 814

1 Q. Okay. Have you discussed what you were
2 going to say in court with your mother.
3 A. No.
4 Q. Not at all.
5 A. Not at all.
6 Q. Did you ever discuss what you were going to
7 say before the Santa Barbara Grand Jury with your
8 mother.
9 A. Never.
10 Q. Never talked about it once.
11 A. Never.
12 Q. How did you arrive to testify before the
13 Santa Barbara Grand Jury.

14 A. One of the sheriff's department officers
15 came and picked me up.
16 Q. Did you discuss what you were going to say
17 in court with either of your brothers.
18 A. No.
19 Q. Just didn't talk to one of them.
20 A. No.
21 Q. At any time.
22 A. No.
23 Q. Did you ever discuss what you were going to
24 say before the Santa Barbara Grand Jury with any of
25 your brothers.
26 A. No.
27 Q. Not once.
28 A. Never. 815

1 Q. Did your brothers ever call you to talk
2 about what they were going to say.
3 A. No.
4 Q. So are you in contact with your brothers.
5 A. Yes.
6 Q. Regular contact.
7 A. Of course.
8 Q. Are you in contact with your mother.
9 A. Of course.
10 Q. Is it regular contact.
11 A. Yes, of course.
12 Q. And yet, during all of this regular contact,
13 nobody has even discussed what was going to happen
14 in this courtroom.
15 A. What's more important to us is our feelings
16 and if we're okay. That's what's important to us.
17 Q. So no one has even discussed it, right.
18 A. No.
19 Q. Not once.
20 A. Never.
21 Q. How often do you talk to your mom.
22 A. Every day, more than -- probably like every
23 hour. We talk a lot.
24 Q. Every hour.
25 A. Yeah, we talk a lot. We're very close.
26 Q. Okay. Would it be accurate to say you talk
27 to her maybe 12 to 15 times a day.
28 A. Probably a little less, but, yeah. 816

1 Q. Okay. And how long have you talked with her
2 on that type of basis. Has it gone on for years.
3 A. Oh, yeah.
4 Q. You and your mom are very close, right.
5 A. Yes.

6 Q. And you and your brothers, Star and Gavin,
7 are very close.
8 A. Even closer.
9 Q. Do you talk to them every day as well.
10 A. Of course.
11 Q. And approximately how many times a day do
12 you talk to Gavin.
13 A. Because he's going to school, he's in stuff
14 right now, I can't really talk to him. But I called
15 him before he went to school today, and I try to
16 catch him before he goes to sleep.
17 Q. And how about Star.
18 A. I talk to him regularly too, as much as I
19 could. They're very busy little boys.
20 Q. Okay. But you talk to them every single
21 day.
22 A. Yeah, I live with them.
23 Q. Live with them now.
24 A. Yes.
25 Q. Where do you live with them.
26 Excuse me, I'm not supposed to go into your
27 address. Pardon me. Strike that.
28 THE COURT: Stricken. 817

1 MR. MESEREAU: Okay. All right.
2 Q. Have you discussed what you were going to
3 say today with Jay Jackson.
4 A. No.
5 Q. At any time.
6 A. No.
7 Q. Have you ever discussed this case with Jay
8 Jackson.
9 A. No.
10 Q. Ever discussed this case with your mother.
11 A. No.
12 Q. Ever discussed this case with Gavin.
13 A. No.
14 Q. Ever discussed this case with Star.
15 A. No.
16 Q. At the home that you share with your mom,
17 Gavin and Star, have you ever seen any documents
18 about this case.
19 A. No.
20 Q. None.
21 A. Well, just what was given to us for us to
22 think, but we've never seen them. We just saw what
23 they came in, but we've never read through each
24 other's stuff.
25 Q. Okay. Let me just explore that, if I can.
26 You saw documents come in some type of
27 package; is that correct.
28 A. We all got separate packages, yes. 818

1 Q. And are you saying you never looked at what
2 was in those packages.
3 A. Just of what was for us.
4 Q. And were there packages for your mom.
5 A. No. They all came in separate packages.
6 They had our names on them.
7 Q. Okay. How many packages are we talking
8 about.
9 A. Well, there's five of us. So five.
10 Q. Okay. So five people got five separate
11 packages of documents.
12 A. Yes.
13 Q. And to your knowledge, was each of the five
14 people's names on different packages.
15 A. Yes.
16 Q. And were those packages given to the people
17 whose names were on them.
18 A. Yes.
19 Q. And was there one that said your name on it.
20 A. Yes.
21 Q. And did you ever discuss any of those
22 documents with anyone else at home.
23 A. No.
24 Q. Never talked with Jay Jackson about the
25 documents.
26 A. No.
27 Q. Or your mom.
28 A. No. 819

1 Q. Or Gavin.
2 A. No.
3 Q. Or Star.
4 A. No.
5 Q. Never said anything to them like, "What did
6 you receive."
7 A. No. We knew they were documents of the
8 case. We know we're not supposed to talk to each
9 other, so we don't.
10 Q. Don't say a word to each other at all.
11 A. No.
12 Q. Are you currently represented by an
13 attorney.
14 A. Other than these, no. Other than these, not
15 that I know of.
16 Q. To your knowledge, is your mother currently
17 represented by an attorney.
18 A. Not that I know of. I don't know.
19 Q. To your knowledge, is Gavin currently
20 represented by an attorney.

21 A. I don't know.
22 Q. To your knowledge, is Star currently
23 represented by an attorney.
24 A. I don't know.
25 Q. Do you know an attorney named Larry Feldman.
26 A. Yes.
27 Q. How do you know an attorney named Larry
28 Feldman. 820

1 A. We met with him one time a long time ago.
2 Q. And when was that.
3 A. I don't remember.
4 Q. Let me just be clear about this. You don't
5 know one way or the other whether your mother
6 currently has an attorney.
7 A. We don't -- I don't know -- I don't talk to
8 my mom about that stuff.
9 Q. And do you talk to Gavin about whether or
10 not he has an attorney.
11 A. We don't talk about that stuff.
12 Q. Do you talk to Star.
13 A. That's not our concern. We don't --
14 Q. Do you talk to Star about whether or not he
15 has an attorney.
16 A. We don't talk about that.
17 Q. You don't know one way or the other.
18 A. We don't know.
19 Q. Okay. You've had attorneys before, correct.
20 A. No.
21 Q. Ever gotten advice from a lawyer.
22 A. No.
23 Q. Never at all.
24 A. No. Other than the city attorney that was
25 involved with the -- the abuse my father put on us.
26 That's all I've --
27 Q. That's the only attorney you've ever spoken
28 to. 821

1 A. And we have a -- a -- I -- against my
2 father. That's the only attorney I know of.
3 Q. Okay. Do you remember visiting Kaiser
4 Permanente Hospital for a consultation with a doctor
5 on June 26th, 2003.
6 A. I don't know what that is.
7 Q. Do you remember going to Kaiser Permanente
8 to complain about headaches.
9 A. Yeah.
10 Q. And you were with your mom, right.
11 A. No, that was the time that I was living with
12 my grandmother. And I went with my grandmother.

13 Q. Did your mother go to the hospital with you.
14 A. No, it was just me and my grandmother.
15 Q. Did you talk to a doctor.
16 A. Yes.
17 Q. Do you remember telling the doctor that you
18 had headache problems.
19 A. Yeah, it was due to, like, stress and stuff.
20 Q. And you told the doctor you got three hours
21 of sleep per week, right.
22 A. Yeah.
23 Q. And you told the doctor you got 12 hours of
24 sleep during weekends, correct.
25 A. Yeah.
26 Q. And when he asked you to explain your family
27 situation, you said you couldn't do it because a
28 lawyer told you not to explain it, right. 822

1 A. Well, yeah. I was scared that somehow my
2 father would do something, so I just said that.
3 Q. Who was the lawyer that told you, "Don't
4 tell the physician what's going on at home".
5 A. That's what I'm telling you, I don't know.
6 Q. Okay. But you told that to the physician,
7 didn't you.
8 A. I don't remember. Probably, yes.
9 Q. And your mother was with you with the
10 physician, true.
11 A. No, my grandmother was.
12 Q. Okay. You went to that physician because
13 you had a civil lawyer representing you at the time,
14 right.
15 A. Not that I remember. I don't know.
16 Q. Well, had you spoken to an attorney named
17 Dickerman at that point.
18 A. We spoke once, yes.
19 Q. Do you know approximately when that was.
20 A. No.
21 Q. And after meeting with Mr. Dickerman, you
22 met with Attorney Larry Feldman, correct.
23 A. Yes.
24 Q. And after meeting with Attorney Larry
25 Feldman, you went to Kaiser, true.
26 A. That had nothing to do with it.
27 Q. I have to ask you, just -- if you can, just
28 answer the question. 823

1 After meeting with Attorney Feldman, you
2 went to Kaiser, true.
3 A. Yes.
4 Q. And you went to Kaiser because you were

5 putting together a claim for damages, correct.
6 A. No. This had nothing to do with it. I
7 had -- I still get those headaches to this day.
8 Those are headaches of lack of sleep. I don't --
9 it's hard for me to sleep.
10 Q. Why would you tell a physician, "I can't
11 tell you the reasons because an attorney told me not
12 to".
13 A. Because I'm afraid of my father. I don't
14 know what he would do. I don't know. I was scared.
15 I was little then.
16 Q. Okay. But your mom accompanied you, right.
17 A. No.
18 Q. Well --
19 MR. SNEDDON: Object as asked and answered.
20 THE COURT: Sustained.
21 Q. BY MR. MESEREAU: Would it refresh your
22 recollection if I just show you the medical report.
23 A. That's fine.
24 Q. May I show it to you.
25 A. I never saw it before. I only saw when the
26 doctor was writing it.
27 MR. MESEREAU: May I approach, Your Honor.
28 THE COURT: I'm not sure you've laid a 824

1 foundation yet.
2 Q. BY MR. MESEREAU: Okay. Would it refresh
3 your recollection that your mother was with you when
4 you told the doctor, "A lawyer told me not to
5 discuss it".
6 A. My grandmother was there. I was living with
7 my grandmother. My mom was not with me.
8 Q. Okay. So if I showed you the report that
9 says your mother was there, that wouldn't change
10 your mind. Is that what you said.
11 A. Well, I call my grandmother my mother. And
12 because of like -- because I was underage, they
13 wouldn't allow my grandmother sharing things
14 because, like, she's a grandmother and the mother
15 has to be present, so I would just say she's my
16 mother.
17 Q. Okay. You call your mother your mother and
18 your grandmother your mother.
19 A. I call my grandmother "Ma."
20 Q. Okay. And did you tell the physician at
21 Kaiser that your grandmother was with you, not your
22 mother.
23 A. I told her I was with my ma.
24 Q. Okay.
25 A. How she put it down, I don't know.
26 Q. Okay. When you were talking with this
27 physician, you explained that your brother Star had

28 a cyst, right. 825

1 A. Yes.

2 Q. You explained your brother Gavin was
3 recovering from cancer, right.

4 A. Yes.

5 Q. And you said your mother has vertigo, right.

6 A. Yes.

7 Q. And you said all of this after meeting with
8 Attorneys Dickerman and Feldman, right.

9 A. They -- no. My mom has always had vertigo.

10 She was just asking me, like, history and to find
11 out why I was having those headaches.

12 Q. Okay. I'd like to ask you a little bit
13 about your testimony yesterday. Okay.

14 A. Okay.

15 Q. Do you know how many times in total you've
16 been to Neverland.

17 A. About four times, I think. I don't
18 remember.

19 Q. And do you know how many times were before
20 the Bashir documentary and how many times were after
21 it.

22 A. Counting the Bashir documentary, that's
23 four. I wasn't counting that one. Counting the
24 Bashir documentary, that's four.

25 Q. Okay. Would that be four visits to
26 Neverland before the Bashir documentary, or four
27 after it, or what would it be.

28 A. That's three before the Bashir documentary. 826

1 Q. Okay. Three before the Bashir documentary
2 aired --

3 A. If you count the Bashir documentary, that's
4 four.

5 Q. That would be -- I'm just trying to get it
6 clear, and I apologize if I don't understand.

7 Would it be three visits that you made to
8 Neverland before the Bashir documentary, and one
9 after the Bashir documentary.

10 A. No. It was three before the Bashir
11 documentary.

12 Q. Okay. Are they all of your visits to
13 Neverland.

14 A. Yes. In total, yes.

15 Q. So no visits to Neverland after the Bashir
16 documentary.

17 A. Yes, there were.

18 Q. Okay. Can I ask you how many times you went
19 after the Bashir documentary, if you know.

20 A. About three. I don't remember.
21 Q. Approximately three, you think.
22 A. I think. I don't know.
23 Q. So you think you've been to Neverland about
24 seven times.
25 A. Well, if you count going back and forth,
26 it's more than -- it's only -- if you count all
27 those back and forth, it's only one after the Bashir
28 documentary. 827

1 Q. Okay. Now, you did testify before that no
2 one in your family watched the Bashir documentary,
3 right.

4 A. Yes.

5 Q. Do you recall on the videotape your mother
6 talking about her holding her hand with Gavin like
7 they did in the Bashir documentary.

8 A. Yes.

9 Q. She must have learned that by watching the
10 Bashir documentary, right.

11 A. No.

12 Q. Well, how did she learn that, if you know.

13 A. Dieter had told us to -- to do that somehow,
14 because they wanted to erase what everybody had saw
15 on the Bashir documentary.

16 Q. But her comment - and it seemed to be a
17 spontaneous comment - was, "We want to hold hands
18 like in the Bashir documentary," right.

19 A. Yes, well, Dieter told her to do that.

20 Bradley Miller was standing right there, and she
21 knew anything that we didn't do and say, that
22 Bradley Miller would go and tell Dieter.

23 Q. Now, when the Bashir documentary came out,
24 you testified the press -- excuse me,
25 representatives of the media approached your home,
26 right.

27 A. The Soto apartment, yes.

28 Q. Did you see them. 828

1 A. I saw a glimpse of them.

2 Q. What do you mean by that.

3 A. Because we closed the door.

4 Q. Okay. Did anyone in your home speak to
5 them.

6 A. I think Jay did for a moment.

7 Q. Do you have any idea what they talked about.

8 A. No.

9 Q. Did you hear what they talked about.

10 A. No.

11 Q. Okay. You learned at some point that your

12 family was being represented in a lawsuit in
13 England, right.
14 A. No.
15 Q. You never heard anything about that.
16 A. No.
17 Q. Did you ever hear your mother even talk
18 about that.
19 A. No.
20 Q. Okay. Do you know for sure that Gavin has
21 never looked at the Bashir documentary.
22 A. Yeah.
23 Q. And how do you know that.
24 A. From what he's told me. Well, I'm
25 constantly with him, and we haven't seen it.
26 Q. How about Star.
27 A. I don't think so either.
28 Q. Are you 100 percent sure that Star has never 829

1 seen the Bashir documentary.
2 A. Well, if they've seen it at school. There's
3 no way they could see it at school, so I don't think
4 they've seen it.
5 Q. Do you know for sure your mother's never
6 seen it.
7 A. I don't think so. I'm with my mom always.
8 Q. Well, there are times you've lived
9 separately from your mother, right.
10 A. Yeah, but I would visit almost every day.
11 Q. Okay. So, realistically, you don't know for
12 sure if your mother had ever seen it.
13 A. Well, they would talk about it.
14 Q. They would talk about it.
15 A. If they knew -- if -- like, if they had seen
16 it, they would have mentioned it somehow. And
17 nobody did.
18 Q. Have you ever discussed the Bashir
19 documentary with your mom.
20 A. No.
21 Q. Have you ever discussed the Bashir
22 documentary with Gavin.
23 A. No.
24 Q. And have you ever discussed the Bashir
25 documentary with Star.
26 A. No.
27 Q. And have you ever discussed the Bashir
28 documentary with Jay Jackson. 830

1 A. No.
2 Q. Have you all sort of agreed not to talk
3 about the Bashir documentary.

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4 A. We just don't really like to talk about
5 anything associated with this. It just upsets us.
6 Q. And you say you've only met with Mr. Feldman
7 once.
8 A. Yes.
9 Q. How about Mr. Dickerman.
10 A. Once also.
11 Q. Okay. And you don't think Mr. Feldman still
12 represents you at all, right.
13 A. I don't know.
14 Q. You don't know.
15 A. I don't think so.
16 Q. Okay. Okay. But you know that your mother
17 has had meetings with him, right.
18 A. I don't know. I work. I'm a full-time
19 student. I'm a full-time cashier. I don't know.
20 Q. Do you know if your mother has ever gone to
21 Beverly Hills to meet with him.
22 A. I don't know.
23 Q. You never heard anything about that.
24 A. No.
25 Q. Never been discussed in the home.
26 A. No.
27 Q. Okay. The prosecutor showed a photograph of
28 your family with Kobe Bryant; do you remember that. 831

1 A. Yes.
2 Q. Do you know when that photograph was taken.
3 A. That was during Gavin's cancer.
4 Q. Okay. Do you know where it was taken.
5 A. At the comedy camp. Well, not the comedy
6 camp. At The Laugh Factory.
7 Q. Now, have you ever associated with Mr.
8 Bryant, other than having the picture taken.
9 A. I wasn't there. I just knew because Gavin
10 was excited that he met him.
11 Q. But do you know if Gavin or your mother have
12 ever been with Mr. Bryant, other than when they had
13 a photo taken with him.
14 A. Well, David and Gavin and Chris Tucker had
15 went to a Laker game before too.
16 Q. To see Kobe play.
17 A. Yeah, and Chris had taken them.
18 Q. Taken them into where.
19 A. Taken them to the locker room, and they had
20 talked and stuff.
21 Q. But you consider -- or at least at the time
22 you considered Chris Tucker to be a close friend,
23 right.
24 A. Yes.
25 Q. You never considered Kobe Bryant to be a
26 close friend, did you.

27 A. No. Just -- it made Gavin happy to know
28 that he knew that person. 832

1 Q. Right. But he never was somebody that your
2 family hung out with.

3 A. Not as close as Chris Tucker, no. We never
4 hung out.

5 Q. Never hung out with Kobe Bryant, right.

6 A. No.

7 Q. And you mentioned Fritz Coleman.

8 A. Yes.

9 Q. And Fritz Coleman is a weatherman in Los
10 Angeles, right.

11 A. Yes.

12 Q. And he does comedy stuff at The Laugh
13 Factory, right.

14 A. Yes.

15 Q. And that's where you met him, right.

16 A. Yes.

17 Q. And did you consider Fritz Coleman to be a
18 close friend of the family.

19 A. Yes.

20 Q. And what do you mean by "close friend".

21 A. He would come over and visit, and we'd
22 laugh, and, you know, spend time.

23 Q. And where would he come to visit.

24 A. The East L.A. apartment.

25 Q. That's on Soto Street, right.

26 A. Yes.

27 Q. How many times did you see Fritz Coleman at
28 Soto Street. 833

1 A. Two, three times, that I remember.

2 Q. Did you ever see him at Jay Jackson's place.

3 A. No.

4 Q. Did you ever see him at your grandmother's
5 in El Monte.

6 A. No, we didn't live there. He would only go
7 to the East L.A. apartment.

8 Q. But you saw him at Louise Palanker's home.

9 A. No, we never went to Louise's house.

10 Q. Did you ever go to Louise's house at all.

11 A. No.

12 Q. Now, she gave your family \$20,000.

13 A. No, she gave us ten.

14 Q. Two checks for \$10,000, right.

15 A. I don't know anything. You got to ask my
16 mom.

17 Q. Okay. But you knew she'd given a large sum
18 of money to your family, right.

19 A. Yeah.
20 Q. Was it your understanding that all that
21 money was spent on the room, to make it ready for
22 Gavin.
23 A. It was.
24 Q. Okay. Is that what your mother told you.
25 A. No. That's what I saw.
26 Q. Okay. So you saw the money spent for that
27 purpose.
28 A. Yes. 834

1 Q. Did you ever talk to Louise Palanker about
2 whether the man who redid that room was actually
3 paid.
4 A. I don't know. I wouldn't talk to her about
5 that kind of stuff.
6 Q. You never saw anybody pay the person who
7 renovated that room, right.
8 A. I just saw him come, and he did the floors
9 and the closet and everything.
10 Q. Right. Right. But if he was paid or not,
11 you don't know.
12 A. I don't know.
13 Q. And you don't know what the total cost was,
14 right.
15 A. Well, all the little stuff that was in
16 there, it was -- I guess it was a lot.
17 Q. Okay. But you don't really know how much,
18 right.
19 A. Like the air conditioning was, like, \$2,000.
20 And the bed itself was a lot. And then the
21 linoleum, the closet, the stereo, the T.V., the DVD
22 player. The whole room was repainted. There was
23 blinds put up. There was everything redone in the
24 whole room. It's totally different from the whole
25 house.
26 Q. Did you ever learn that the man who
27 renovated that room wasn't paid at all.
28 A. I don't know anything. 835

1 Q. Okay. Because you weren't in charge of the
2 money, correct.
3 A. No.
4 Q. Okay. Do you know who was.
5 A. I think David was.
6 Q. And David was your father, right.
7 A. Yes.
8 Q. And he's the man that your mother refers to
9 as "the biological father," right.
10 A. Yes.

11 Q. Okay. To your knowledge, did Fritz Coleman
12 get involved in a fund-raiser for Gavin at The Laugh
13 Factory.

14 A. I don't know.

15 Q. You don't know anything about that.

16 A. Huh-uh.

17 Q. Were you ever involved in any fund-raising
18 activities for Gavin.

19 A. The only one that I went to was the one that
20 I met Chris at. And that was really just a
21 graduation.

22 Q. That's at The Laugh Factory.

23 A. Yes.

24 Q. Okay. Was it a fund-raiser.

25 A. It was just a graduation, like how we had,
26 like how we were little comedians. That's what it
27 was.

28 Q. Okay. Okay. And you did indicate that you 836

1 knew Jamie Masada.

2 A. Yes.

3 Q. And Jamie Masada introduced you to a bunch
4 of celebrities, right.

5 A. They would come to our little classes that
6 we had.

7 Q. Did you meet Mike Tyson at one point.

8 A. Yeah.

9 Q. How did you meet Mike Tyson.

10 A. Through Chris Tucker.

11 Q. Did he take you to Mike Tyson's home.

12 A. Yes.

13 Q. Do you know when that was.

14 A. That was during -- when Chris had took us to
15 the Rush Hour 2 in Vegas.

16 Q. And did you meet Adam Sandler.

17 A. We never met him.

18 Q. Did you ever meet Jim Carey.

19 A. No.

20 Q. Your brother tried to meet Jim Carey, didn't
21 he.

22 A. Yeah. That's one of his favorite comedians,
23 too.

24 Q. Right. Right. Okay. Now, other than Chris
25 Tucker, who you felt was a close friend, and Michael
26 Jackson, who was a close friend, are there any other
27 celebrities - I guess that would include Fritz
28 Coleman - that you considered close friends at this 837

1 point in time.

2 A. Well, Fritz also. And that's it, that I can

3 remember. Well, George Lopez, too. George Lopez
4 was a close friend of ours, too.
5 Q. How did you meet George Lopez.
6 A. Through the comedy camp also.
7 Q. Did you go to his home.
8 A. We never went to his home. He would come
9 and visit Gavin at the hospital.
10 Q. Did he ever come to your home, to your
11 knowledge.
12 A. Not that I remember.
13 Q. Do you know if George Lopez was involved in
14 any efforts by your mother to raise money.
15 A. Any efforts to raise money was by my father.
16 And I don't know what he would do. He's just a
17 crazy man. I don't know.
18 Q. Did you -- are you aware of whether or not
19 your mother and Gavin called Jay Leno on the phone
20 to ask for money.
21 A. I don't remember that.
22 Q. Do you know anything about that.
23 A. I don't remember that. I was never told
24 anything like that.
25 Q. Okay. Do you know anything about the Santa
26 Barbara Sheriffs recording that conversation.
27 A. I don't remember that.
28 Q. Okay. So as far as you know, your mother 838

1 never tried to raise money from anybody.
2 A. Yes.
3 Q. You're saying she never tried to raise money
4 from anybody, right.
5 A. Yes.
6 Q. Is that what you're saying.
7 A. Yes.
8 Q. Okay. Your mother never asked for money
9 from anyone to help Gavin at any time, right.
10 A. No.
11 Q. Never saw that, never heard about it.
12 A. No.
13 Q. Okay. Are you saying, under oath, that the
14 only person in your family that tried to raise money
15 for Gavin was your father, David.
16 A. Yeah, he would pester a lot of people. And
17 then when my mom would find out, she would get kind
18 of upset about it.
19 Q. Really. Your mother would get upset if she
20 thought David was trying to raise money.
21 A. He's just -- I don't know, he's a weird man.
22 Q. Well, who asked Louise Palanker for money;
23 do you know.
24 A. She gave it to us. We never asked her for
25 anything. She gave it to us.

26 Q. She just volunteered it.
27 A. Yeah.
28 Q. Did you ever see your mother talking to 839

1 Louise Palanker.
2 A. Well, they would talk on the phone once in a
3 while, yeah, as friends do.
4 Q. Now, you saw the rebuttal video, obviously,
5 right.
6 A. Yes.
7 Q. And you've seen it before, right.
8 A. Well, yesterday I saw it.
9 Q. Yesterday. And you see your mother saying
10 that, "When we were" -- words to the effect that,
11 "When we needed help, nobody would help us."
12 Remember that.
13 A. Yeah.
14 Q. And she says, "Department of Children &
15 Family Services wouldn't help," right.
16 A. Yes.
17 Q. She says, "Nobody would help and we had to
18 eat cereal," right.
19 A. Yes.
20 Q. Are you telling the jury you've never seen
21 your mother ask for help.
22 A. No.
23 Q. Never in your lifetime.
24 A. No, she was just trying to make it more
25 dramatic, because that's what they wanted.
26 Q. Okay. Okay. So your mother really wasn't
27 being honest when she gave that talk about, "Nobody
28 would help us when we needed help"; is that right. 840

1 A. Yeah, she was just trying to make it more
2 dramatic, because that's what they wanted.
3 Q. So are -- okay. So as far as you're
4 concerned, that was all memorized.
5 A. Not memorized, but everything -- we had been
6 given a script. You can even see at the end, with
7 the guy holding it.
8 Q. Right. There's a sheet with some questions
9 on it, right.
10 A. That was the script also.
11 Q. Okay. Are you saying that everything you
12 all said on that tape was memorized word for word.
13 A. It wasn't memorized, but it was just things,
14 you know, "You got to remember this, you got to
15 remember that." I'm not going to remember
16 everything right now.
17 Q. Well, did your mother, in your opinion,

18 volunteer any of the comments she made on that
19 video.
20 A. I don't know. You gotta ask her.
21 Q. Have you ever discussed this video with your
22 mother.
23 A. No.
24 Q. Ever discussed this video with Gavin.
25 A. No.
26 Q. Ever discussed it with Star.
27 A. No.
28 Q. Ever discussed it with Jay Jackson. 841

1 A. No.
2 Q. Not at any time.
3 A. Never.
4 Q. Okay. Now, did you see your mom last night.
5 A. No.
6 Q. Did you see your mom in the last two days.
7 A. No.
8 Q. But you watched this last night, right.
9 A. Yes.
10 Q. Did you watch it at home.
11 A. I watched it where I'm staying at.
12 Q. Okay. Okay. Did you watch it with anyone.
13 A. No, I was by myself in the room, with the
14 door shut.
15 Q. Okay. It was delivered to you by Mr. Robel,
16 right.
17 A. Yes.
18 Q. Have you ever discussed anything that's said
19 in this video with your father.
20 A. My stepfather --
21 Q. Yes.
22 A. -- or David.
23 Q. Yes.
24 A. Never.
25 Q. Ever discussed anything that's in this video
26 with the sheriffs.
27 A. Well, other than with -- they asked us
28 questions about it. 842

1 Q. Okay. But never with anyone in your family.
2 A. Never.
3 Q. Okay. Just like Bashir; you never discussed
4 Bashir with anyone in your family, right.
5 A. Never.
6 Q. Never. All right. Now, when you first went
7 to Neverland, who first told you you were going to
8 Neverland.
9 A. I don't remember. All's I know is that we

10 went. It was a long time ago.
11 Q. Okay. So the first time you went, it's
12 unclear to you, at least this morning, whose idea it
13 was, right.
14 A. I don't remember.
15 Q. Okay. And do you remember how you got there
16 the first time.
17 A. A limo came and picked us up.
18 Q. Do you remember who was driving the
19 limousine.
20 A. No.
21 Q. Okay. When did you first talk to Michael
22 Jackson.
23 A. That day.
24 Q. And was that the first time you had seen
25 him.
26 A. Yeah.
27 Q. Okay. You indicated yesterday that you
28 stayed in a guest cottage, right. 843

1 A. Yes.
2 Q. And can you describe the room you stayed in.
3 A. Well, it has two beds. A window faces the
4 main house, and then there's another window to the
5 left. There's a desk under that window. There's a
6 rest room to the right.
7 Q. Did you ever go into your mother's room --
8 A. Yes.
9 Q. -- that visit.
10 A. Yes.
11 Q. And was the room next to yours.
12 A. Yes. For that -- which visit are you
13 talking about.
14 Q. The first one.
15 A. The very first one.
16 Q. Yes.
17 A. That's with David and my mom. Yes, I went
18 into that room.
19 Q. Did you ever go into David's room.
20 A. They stood together.
21 Q. Okay. Now, correct me if I'm wrong, did you
22 tell the jury that the first day you arrived at
23 Neverland, you all had dinner in the main house.
24 A. Yes.
25 Q. And your father, your mother, Star, Gavin
26 and you had dinner in the main dining room in that
27 main house, right.
28 A. Yes. 844

1 Q. And was Michael Jackson there.

2 A. Yes.
3 Q. Was anyone else there.
4 A. Not that I remember.
5 Q. There was certainly kitchen help around,
6 right.
7 A. Well, they would come in and out.
8 Q. Right. And that was the first time your
9 family ever had dinner with Michael Jackson, right.
10 A. Yes.
11 Q. And without going into what anyone said, did
12 you tell the jury yesterday that the first time you
13 had dinner with Michael Jackson and the family, you
14 discussed whether Gavin was going to stay in the
15 main house.
16 A. Yeah. At that dinner, yes.
17 Q. The first time you ever had dinner with him.
18 A. Yes.
19 THE COURT: Counsel, sorry to interrupt.
20 MR. MESEREAU: Oh. Okay. Okay.
21 (Recess taken.)
22 THE COURT: You may proceed.
23 MR. MESEREAU: Thank you, Your Honor.
24 Q. Ms. Arvizo, do you remember on December
25 20th, 2003 -- excuse me, excuse me. Pardon me. Not
26 December. Pardon me.
27 Do you remember, in your meeting with the
28 social workers, saying that you often take a 845

1 girlfriend with you to Neverland to keep you
2 company.
3 A. No. No one ever went with me at Neverland.
4 Q. Would it refresh your recollection if I show
5 you the social workers' report.
6 A. Well, I know I said that, but that's not
7 true.
8 Q. But you did say that --
9 A. Yeah.
10 Q. -- to the three social workers from the Los
11 Angeles Department of Children & Family Services.
12 A. Yes, I did.
13 Q. Okay. And you also told them that you
14 denied that your mother Janet had ever neglected
15 you, right.
16 A. My mom never neglected us.
17 Q. But my question is, you told the three
18 social workers that your mother had never neglected
19 you, right.
20 A. Yes.
21 Q. And you told the social workers your mother,
22 "Always knows what's going on when she is at
23 Neverland with us," right.
24 A. Yeah.

25 Q. You told them that.
26 A. Yeah.
27 Q. Was that true.
28 A. No. 846

1 Q. That was a lie.
2 A. Yeah.
3 Q. And you're telling us today that when you
4 told those three social workers that you'd bring a
5 girlfriend with you to keep you company at
6 Neverland, that was a lie, right.
7 A. Yeah. There was no one to take, in the
8 first place.
9 Q. You told those social workers, "Michael is
10 like a father to all of us," right.
11 A. Yeah.
12 Q. You told the social workers, "Michael is so
13 kind and loving," right.
14 A. I don't remember a lot of things I said. It
15 was a really long time ago.
16 Q. Would it refresh your recollection if I just
17 show you the report.
18 A. It's not me writing it, so I don't know.
19 Q. Well, would you want to give it a chance.
20 A. Okay.
21 Q. Do you want to see it.
22 A. It's fine. You're reading it anyways.
23 Q. You don't want to see it.
24 A. No, that's fine.
25 Q. Okay. So you don't want to see if it
26 refreshes your recollection.
27 A. Well, the lady wrote it, so it's not going
28 to refresh anything. 847

1 Q. You don't want to try.
2 MR. SNEDDON: Your Honor, I'm going to
3 object as argumentative.
4 MR. MESEREAU: Okay. I'll move on, Your
5 Honor.
6 THE COURT: All right.
7 Q. BY MR. MESEREAU: You told the social
8 workers your father threatened to kill your mother,
9 right.
10 A. Yes.
11 MR. SNEDDON: I'm going to object as
12 hearsay. He's reading the report into the record,
13 here.
14 THE COURT: Overruled.
15 You may answer. You may answer.
16 THE WITNESS: Yes.

17 Q. BY MR. MESEREAU: You told the social
18 workers you'd gone to Neverland several times with
19 your brothers, right.
20 A. I don't remember. I don't know what was
21 said on that report.
22 Q. Would you like to see the report to see if
23 it refreshes your recollection.
24 A. No.
25 Q. Don't want to even look at it.
26 A. It's not my writing, it's not what I wrote,
27 so it's not going to refresh my memory.
28 Q. Did you tell the social workers, "I've never 848

1 seen Michael do anything sexually inappropriate with
2 Gavin or Star".
3 A. I don't remember what I said.
4 Q. Would it refresh your recollection if I show
5 you --
6 A. No.
7 Q. -- that part of the report.
8 A. No. It's not --
9 Q. It just wouldn't.
10 A. It wouldn't.
11 Q. Have you discussed what you were going to
12 say today in court with anybody.
13 A. No.
14 Q. Nobody.
15 A. No.
16 Q. All right. Now, yesterday you identified
17 some photographs. Remember those photographs.
18 A. Yes.
19 Q. Before you were asked to identify them in
20 court by the prosecutor, had you seen those
21 photographs before.
22 A. Once, yes.
23 Q. Who showed them to you.
24 A. Mr. Sneddon did.
25 Q. And when did Mr. Sneddon show you the
26 photographs.
27 A. A couple of days before I even -- a day or
28 two before I even saw them here. 849

1 Q. Okay. Now, where did he meet with you to
2 show you the photographs.
3 A. In where he was located, in there.
4 Q. Excuse me.
5 A. Where he was located.
6 Q. Okay. So you came to Mr. Sneddon's office.
7 A. It wasn't an office.
8 Q. Was it a home.

9 A. It was in somebody's home. But it was a
10 home, yes.
11 Q. Okay. And before, all you said was, "Mr.
12 Sneddon gave me some grand jury testimony to look
13 at," right.
14 A. Well, now that you're asking me about
15 pictures, I remember.
16 Q. Now you remember them.
17 A. Yeah.
18 Q. Okay. And did Mr. Sneddon show you that
19 picture of the room that was renovated for Gavin.
20 A. He showed me the pictures and then I would
21 tell him what they were. He wouldn't tell me what
22 they were.
23 Q. Did he ever tell you where he got the
24 pictures.
25 A. I don't know.
26 Q. You don't know if he said it or not.
27 A. I don't know where he got them.
28 Q. Did he ever show you the picture of Gavin's 850

1 room and say, "Here's a picture," and tell you where
2 he got it.
3 A. Well, those are our pictures.
4 Q. They're your pictures.
5 A. Of -- with Gavin in his room.
6 Q. Yes.
7 A. Yes, those are our pictures.
8 Q. Did you give the picture to Mr. Sneddon.
9 A. Yes. He wanted a picture of Gavin, yes.
10 Q. Did you give Mr. Sneddon any other photos.
11 A. The Kobe Bryant picture, yes. There's other
12 pictures that we've given them.
13 Q. And when did you give him those pictures.
14 A. I don't remember.
15 Q. Was it within the last two weeks.
16 A. I think so, yes.
17 Q. Has anyone ever told you what I said in my
18 opening statement in this courtroom.
19 A. No.
20 Q. No one's even discussed anything I said.
21 A. No. Not that I remember.
22 Q. Not that you remember.
23 A. I don't know, no.
24 Q. In the last week, has anyone said to you
25 words to the effect, "Mr. Mesereau said the
26 following about the case".
27 A. No. Not that I remember.
28 Q. Not that you remember. Okay. 851

1 Has anyone ever suggested to you that, "You
2 need to address some issues that Mr. Mesereau talked
3 about in his opening statement".
4 A. Not that I remember, no.
5 Q. Not that you remember.
6 A. No.
7 Q. Are you sure about that.
8 A. Yeah.
9 Q. You're sure.
10 A. Yes.
11 Q. Okay. All right.
12 Now, you told the jury that the first night
13 you and your family were at Neverland, you had
14 dinner in the main dining room and discussed whether
15 or not Gavin was going to sleep in Michael Jackson's
16 bedroom, right.
17 A. Yes.
18 Q. Now, that was the first day you'd ever met
19 Michael Jackson, right.
20 A. Yes.
21 Q. You had arrived in the afternoon, right.
22 A. Yes.
23 Q. You said you had played at Neverland with
24 your brothers that afternoon, right.
25 A. I don't remember what we did. All I
26 remember is me meeting him, and the rooms, and that
27 we ate dinner that day.
28 Q. So would you say you were there a couple of 852

1 hours before you had dinner.
2 A. Yeah.
3 Q. Okay. Was your mother in the dining room.
4 A. Yes, we were all in the dining room.
5 Q. And the subject at dinner came up, "Will
6 Gavin sleep in Michael's bedroom," the first dinner.
7 A. Yes, Gavin brought it up in the dining room,
8 yes.
9 Q. Okay. To your knowledge, did your father
10 approve.
11 A. I don't remember. I think he did.
12 Q. To your knowledge, did your mother approve.
13 A. Yeah, I think she did.
14 Q. Okay. When you met with the social workers,
15 did you tell them that your father and mother had
16 approved Gavin sleeping in Michael Jackson's bedroom
17 the first time you were at Neverland.
18 A. If they had asked me, I probably would have
19 said, "Yes."
20 Q. Because you would have told them the truth
21 that day.
22 A. Yes, well, on certain things. Because --
23 Q. You would have told them the truth about

24 certain things, but not other things, right.
25 A. Well, yeah, because you already kind of knew
26 not to say what went on at Neverland.
27 Q. So you would have lied about some things and
28 not lied about other things, depending on what you 853

1 were asked, right.

2 A. Yeah.

3 Q. But you never discussed with your mother
4 what you were going to say if questioned by the
5 three social workers, right.

6 A. Not that I remember, no.

7 Q. Never did.

8 A. Not that I remember.

9 Q. Okay. I believe you said you went to
10 Neverland twice with Mr. Tucker, right.

11 A. Yes.

12 Q. And approximately when was that.

13 A. I don't remember when. It was after our
14 first visit, after Gavin was already in remission.
15 I don't remember when.

16 Q. Was Mr. Tucker there during the Bashir
17 filming.

18 A. No.

19 Q. Didn't you testify yesterday that Mr. Tucker
20 was there for the Bashir filming.

21 A. No.

22 Q. You accompanied your brothers to Neverland
23 for the Bashir film, true.

24 A. Yes.

25 Q. And did you discuss with your brothers on
26 the way the fact that you were going to be filmed.

27 A. We didn't know we were until we got there.

28 Q. Okay. You thought you were just visiting. 854

1 A. Yeah. We just thought that Michael wanted
2 to see us.

3 Q. Didn't you say something yesterday about
4 filming your brothers like had been done before.

5 A. Yeah, they thought it was like when they had
6 done one previously of just my brothers and
7 Mr. Jackson.

8 Q. Right. So you thought that's what it was
9 going to be.

10 A. Well, when we got there, we found out we
11 were going to get filmed, yes.

12 Q. Okay. And were your brothers eager to be
13 filmed, as far as you knew.

14 A. I don't know. You have to ask them.

15 Q. Well, what was your impression.

16 A. I didn't think I was going to get filmed at
17 all. I thought the whole focus was on Gavin.
18 Q. Did someone tell you to say that today.
19 A. No.
20 Q. No.
21 A. That's my own words.
22 Q. Oh, okay.
23 You were filmed, correct.
24 A. Yes.
25 Q. You spoke on the film, right.
26 A. Yes.
27 Q. And you were majoring in performing arts,
28 true. 855

1 A. Majoring in performing arts.
2 Q. Uh-huh.
3 A. I'm not majoring in performing arts.
4 Q. Were you studying performing arts at the
5 time.
6 A. I was taking extra classes at my school
7 because that's the ones they have you take, yes.
8 Q. Did you want to be in that film.
9 A. No. I didn't know I was going to be in that
10 film until, like, they were saying, "Okay, now we're
11 going to film, you know, everybody in the kitchen."
12 I didn't know I was. I thought the whole focus was
13 Gavin.
14 Q. Did you want to be in the film.
15 A. I didn't care. I was just watching Gavin.
16 Q. Did you want to be in the film; yes or no.
17 A. I didn't care for it, no.
18 Q. Did you tell anyone, "I don't want to be in
19 this film".
20 A. I just -- I did along with what they were
21 asking me.
22 Q. Okay. So you felt you had no say in the
23 matter, right.
24 A. Well, I --
25 MR. SNEDDON: Object as argumentative, Your
26 Honor.
27 MR. MESEREAU: Okay. Withdrawn.
28 Q. Now, has your mother ever told you to say in 856

1 court that she never tried to raise money for Gavin.
2 A. She's never told me anything to say in
3 court.
4 Q. Okay. You've never discussed what you'll
5 say in court with her at any time.
6 A. Never. Never.
7 Q. Okay. Do you have any knowledge of your

8 mother going to a newspaper in El Monte to place an
9 ad in the paper to raise money for Gavin.

10 A. No. What that was, was my aunt's -- that's
11 her friend, and she wanted to do a story, because
12 they found out of Gavin's illness.

13 Q. Do you have knowledge about that.

14 A. A little bit. Not really.

15 Q. Do you know if your mother ever spoke to
16 anyone with that newspaper about raising money for
17 Gavin.

18 A. No. Not that I remember.

19 Q. So you don't think she did.

20 A. No.

21 Q. Never discussed that with your mom, as to
22 whether or not she approached them.

23 A. They just asked a couple of questions to my
24 mom about Gavin's illness and stuff. That was it.

25 Q. Do you have any knowledge of your mother
26 calling the paper up and complaining that they
27 hadn't put the bank account in the ad.

28 A. I don't remember that. 857

1 Q. Never heard anything about that.

2 A. I don't remember that.

3 Q. Okay. But as far as you know today, your
4 mother never approached that paper about raising
5 money.

6 A. No.

7 Q. Okay. Did you ever discuss that issue with
8 your mother.

9 A. No.

10 Q. Have you followed this case on television at
11 all.

12 A. Just when you're flipping the channels and
13 you see something. But I keep going, because it
14 just upsets us.

15 Q. Have you watched any shows on television
16 that talked about the case.

17 A. No.

18 Q. Never.

19 A. Never.

20 Q. Okay. Have you watched any shows on
21 television that talked about your mom.

22 A. No.

23 Q. Never.

24 A. Never.

25 Q. Ever discuss with your mom any shows that
26 appeared on television about the case.

27 A. No.

28 Q. Never. 858

1 A. Never.
2 Q. Ever discuss with Gavin any shows that
3 appeared on television about this case.
4 A. Especially not, no.
5 Q. Have you ever discussed with your brother
6 Star any shows on television that appeared about the
7 case.
8 A. No.
9 Q. Ever discuss with Jay Jackson any of these
10 television shows that talked about this case.
11 A. No.
12 Q. Now, your mother and Jay Jackson are married
13 now, right.
14 A. Yes, he's my stepfather.
15 Q. He's still in the United States Army, right.
16 A. Yes, he is.
17 Q. As a reserve.
18 A. No, he's active now.
19 Q. He is active now.
20 A. Yes, he is. He's been since my mom -- since
21 my mom and them have been dating, he's been in
22 active duty.
23 Q. He was in the reserve at one point, wasn't
24 he.
25 A. They turned him back in because of the war.
26 Q. Where is he stationed now, if you know.
27 MR. SNEDDON: Judge, I'm going to --
28 Q. BY MR. MESEREAU: I don't mean the address, 859

1 but is he stationed at an Army base.
2 A. He's stationed --
3 MR. SNEDDON: Excuse me.
4 Counsel, I want to object, Your Honor, in
5 terms of where he's living now with the family in
6 terms of the location. I don't think it's relevant
7 to this litigation, and it presents certain
8 problems that I'll address at sidebar, if you wish
9 me to, but --
10 THE COURT: Do you need to know where he is
11 for any reason.
12 MR. MESEREAU: I was just wondering where he
13 was stationed. I didn't want the address.
14 THE COURT: Let's go ahead.
15 MR. MESEREAU: Okay. Okay.
16 Q. Now, you testified yesterday about the size
17 of a T.V. set in Gavin's renovated room, right.
18 A. Yes.
19 Q. Did somebody tell you they were going to ask
20 you that question before you appeared yesterday.
21 A. No.
22 Q. So yesterday was the first time you learned

23 that that might even be an issue in the case.
24 A. Yeah.
25 Q. Okay. No sheriff ever discussed that with
26 you.
27 A. I don't remember. I don't -- I don't know.
28 Q. Mr. Sneddon never discussed it with you. 860

1 A. Well, he had asked me what things were in
2 that room.
3 Q. Okay.
4 A. I told him there was a T.V. and stuff.
5 Q. Do you have any knowledge of Louise Palanker
6 visiting that room and complaining about what was in
7 it.
8 A. I don't remember.
9 Q. Did you ever see Louise Palanker in that
10 room.
11 A. I don't remember. I just mainly remember
12 her going to the hospital where Gavin was at.
13 Q. Okay. Okay. You had your photo taken with
14 Louise Palanker, right.
15 A. Yes, several.
16 Q. And were they all at The Laugh Factory.
17 A. No, some were at the hospital also.
18 Q. So she was a regular visitor at the
19 hospital, right.
20 A. Yes.
21 Q. Okay. Now, you know someone named Carol
22 Lamir, correct.
23 A. Yes.
24 Q. How did you meet Carol Lamir.
25 A. At a dance studio.
26 Q. And approximately when was that.
27 A. I don't know. We were really young.
28 Q. And at some point you moved in with Carol 861

1 Lamir, true.
2 A. I never moved in with her.
3 Q. You never lived at her place for a sustained
4 period of time.
5 A. I visited her for about a week.
6 Q. Just one week.
7 A. Well, it was several visits that she would
8 come and pick me up, but I never moved in with her.
9 Q. Did you ever live with her for a month at a
10 time.
11 A. No.
12 Q. How about a week at a time.
13 A. Maybe so, a week.
14 Q. How many weeks do you think you lived at her

15 place.
16 A. The longest I stood there at a time was
17 week. And I think it was like two or three times
18 that I stood with her.
19 Q. Well, you lived with her during the summer
20 of the year 2000, right.
21 A. Yes.
22 Q. For how long did you live --
23 A. I didn't live with her, though. I stood
24 with her in the year 2000.
25 Q. Pardon me.
26 A. I didn't live with her. I stood with her in
27 the year 2000.
28 Q. You -- 862

1 A. I never lived with Carol Lamir.
2 Q. Did you ever bring a suitcase with clothes
3 to Carol Lamir's home.
4 A. Yeah, I was visiting. I took clothes.
5 Q. And you stayed weeks at a time, right.
6 A. Just one week at a time. That was the max.
7 I don't remember staying any longer.
8 Q. How many times did you stay for
9 approximately a week at Carol Lamir's home.
10 A. Probably like -- I stood there a week at one
11 time, and then close to a week the other two times.
12 Q. You asked her if you could move in, didn't
13 you.
14 A. No, I didn't.
15 Q. Okay. You told Carol Lamir stories about
16 your mother, didn't you.
17 A. No.
18 Q. You told her your mother would awaken you at
19 2:00 in the morning, correct.
20 A. No.
21 Q. You told her your mother would beat your
22 father, didn't you.
23 A. No. I told her my -- I tried telling her
24 that my father would beat my mother.
25 Q. You told Carol Lamir that your mother was
26 telling you to attack your father, when, in reality,
27 your mother was beating your father, right.
28 A. No. 863

1 Q. You never said anything like that to Carol
2 Lamir.
3 A. No.
4 Q. You constantly told Carol about Janet
5 hitting you and your brothers, true.
6 A. No.

7 Q. And at one point you told Carol Lamir that
8 your family was going to move into a big house in
9 the Hollywood Hills, correct.
10 A. I never told her that.
11 Q. Never said that at all.
12 A. No.
13 Q. Was it your understanding that Carol Lamir
14 asked Michael Jackson for a vehicle for your family
15 to use.
16 A. I don't know.
17 Q. Don't know anything about that.
18 A. I don't know.
19 Q. Did you tell Mrs. Lamir that Michael Jackson
20 gave Gavin video games and players.
21 A. Yeah.
22 Q. Do you know when you told that to Carol
23 Lamir.
24 A. One of the times that I was staying there.
25 I don't know.
26 Q. Okay. But you don't remember how many times
27 you stayed there, right.
28 A. I don't know. 864

1 Q. Has anyone discussed --
2 A. It's not clear. It was too long ago.
3 Q. Has anyone discussed with you what you said
4 to Carol Lamir before today.
5 A. Not that I remember, no.
6 Q. Has any police officer discussed it with
7 you.
8 A. Not that I remember. I don't know.
9 Q. Any sheriff.
10 A. Not that I remember. I don't know.
11 Q. Mr. Sneddon.
12 A. Not that I remember. I don't know.
13 Q. Mr. Robel.
14 A. All they have asked me is who she is. And I
15 told him who she was.
16 Q. And when did you last tell any of them who
17 she is.
18 A. A couple weeks ago. I don't know.
19 Q. You don't know when. Was it in the last
20 week.
21 A. No. It was farther than that.
22 Q. Okay. Did anyone ask you any questions
23 about Carol Lamir in the last week.
24 A. No.
25 Q. Okay. Has anyone told you I mentioned Carol
26 Lamir in my opening statement in this case.
27 A. No. Nobody talked to me about your opening
28 statement. 865

1 Q. Okay. Who did you discuss Carol Lamir with.
2 A. I don't remember. One of the officers. I
3 don't remember.
4 Q. Was that in the last month.
5 A. I think so.
6 Q. Okay. Did you ever tell Carol Lamir that
7 Janet would take her children places and
8 intentionally not feed them or bring food.
9 A. No.
10 Q. Did you ever tell Carol Lamir that it was
11 Janet's intent that the children be fed by whoever
12 they were visiting.
13 A. No.
14 Q. Never said anything like that.
15 A. No.
16 Q. Are you saying you never complained about
17 your mother at all to Carol Lamir.
18 A. No. My mom's a very, very, very good mother
19 to me.
20 Q. And you never complained about her one bit.
21 A. No.
22 Q. Never complained about her to Carol.
23 A. No.
24 Q. Okay. Were you at the fund-raiser that
25 Jamie Masada put together.
26 A. I don't know which one you're talking about.
27 Q. Were you ever at a fund-raiser for Gavin at
28 The Laugh Factory. 866

1 A. The one that I thought was a fund-raiser was
2 the one with Chris, but it ended up just being a
3 graduation.
4 Q. It wasn't a fund-raiser at all.
5 A. Not that I know of. It was just little
6 kids, like us, that were graduating, like how we
7 did.
8 Q. Did anyone try and raise money for Gavin at
9 that event, to your knowledge.
10 A. Not that I know of.
11 Q. Never heard anything about that.
12 A. No.
13 Q. Okay. Were you there.
14 A. Yes, I was there.
15 Q. Okay. Do you know when that was,
16 approximately.
17 A. I think it was in -- I don't know.
18 Q. Did Gavin perform at that fund-raiser.
19 A. I think he did, for a second.
20 Q. Okay. And "for a second," what do you mean.
21 A. Like for a couple minutes. That's when he

22 was going through chemotherapy, so he couldn't stand
23 for that long.
24 Q. Okay. So he just performed a little bit.
25 A. Yeah.
26 Q. All right. But you think that was just for
27 a graduation, not to raise any funds.
28 A. Well, it was like 13 kids. They were doing 867

1 little acts.
2 Q. Okay.
3 A. It was just like what we did.
4 Q. And Chris Tucker was there.
5 A. Yes, he was.
6 Q. Any other celebrities there; do you know.
7 A. Not that I remember.
8 Q. Okay. How many times have you testified
9 before under oath, if you know.
10 A. Well, the grand jury. Then the one that I
11 did because my father abused us.
12 Q. Now, the grand jury was approximately
13 April -- March 30th to April 1st, 2004; does that
14 sound right to you.
15 A. Yes, it was the day before my birthday.
16 Q. Okay. Okay. And you came and testified,
17 under oath, to the grand jury, right.
18 A. Yes, I did.
19 Q. Now, what you're saying is you testified in
20 a court proceeding involving your father and mother
21 previously, right.
22 A. Involving my father, yes.
23 Q. Okay. Do you know approximately when that
24 was.
25 A. I was in high school. I was 15 years old.
26 Q. Okay. Now, that had to do with a
27 restraining order, correct.
28 A. It had to do with -- I don't know what it 868

1 was about, but the Judge wanted to speak with me on
2 how I felt towards my father and what he's done to
3 me.
4 Q. And did you talk to the Judge.
5 A. Yes, I did.
6 Q. Was your mother there.
7 A. She was there outside, but the Judge had
8 brought us into her chambers. Because my father's
9 sisters and Carol Lamir were making faces at us.
10 Q. So Carol Lamir was there, too.
11 A. Yes, she came with David.
12 Q. And she was making faces at you.
13 A. Yes.

14 Q. And did you think she was siding with David.
15 A. Yes.
16 Q. Okay. Was your mother, at that time,
17 employed; do you know.
18 A. I don't remember.
19 Q. Were you living with your mother then.
20 A. Yes, I was.
21 Q. Now, the court proceeding you went to
22 concerned whether or not your father had spoken to
23 you, right.
24 A. I don't remember. All I know is that she
25 asked -- the city attorney asked me questions about
26 my father and how our relationship was, and
27 different events, yes.
28 Q. And was your mother there. 869

1 A. She was on the outside. The Judge had
2 brought us into her chambers.
3 Q. And what was your mother's state of health
4 at that point; do you know.
5 A. She had gotten two operations on her feet,
6 because her bones, they needed fixing. One was
7 cracked and repinned together, and the other was
8 shaved.
9 Q. Okay.
10 A. So she could hardly walk that far.
11 Q. Do you recall -- and this is a sensitive
12 area, and I'll stop, you know, if you need a break,
13 with Judge Melville's permission, of course.
14 Do you recall members of your family
15 accusing each other of molestation.
16 A. No.
17 Q. Do you recall your mother ever telling the
18 Los Angeles Police Department that David had
19 molested you.
20 A. Yes.
21 Q. Do you recall Gavin ever making any
22 allegations of molestation before.
23 A. Gavin never made any to David. What that
24 was, was that the Judge -- the detective had asked
25 my mother, "Is there anything you want to get off
26 your chest." And she said, "Well, one time when she
27 was younger," and I know, because I was there when
28 the detective came. But that court proceeding had 870

1 nothing to do with this. The detective just asked
2 her, "If you wanted to get anything off your chest."
3 Q. To your mother.
4 A. Yes.
5 Q. Do you recall Gavin making any allegations

6 before this case.
7 A. Never did.
8 Q. Did you ever hear anything about that.
9 A. He never did. He never has.
10 Q. Do you ever recall -- did anyone ever tell
11 you that they had heard Gavin had made an allegation
12 against your mother.
13 A. He never has. He never has made any
14 allegations against anybody.
15 Q. Okay. Do you know if he's ever made them
16 with anyone with the Department of Children & Family
17 Services.
18 A. He never has.
19 Q. You're sure of that.
20 A. Yes, I'm sure.
21 Q. Were you there when they interviewed him.
22 A. No, but I know him.
23 Q. Okay. So as you sit here today, you've
24 never heard anything about Gavin ever making any
25 other allegation about molestation against anybody.
26 A. No.
27 Q. Okay. Never.
28 A. Against my parents, I've never heard him say 871

1 any allegations.
2 Q. My question is this: Have you ever -- has
3 anyone ever told you, regardless of whether you
4 think it's true or not, that Gavin ever made an
5 allegation against your mother before.
6 A. No. Never made an allegation against my
7 mother.
8 Q. Okay. I'm not asking if you think he did it
9 or not. I'm asking if anyone's ever told you they
10 had heard that he had.
11 A. No.
12 Q. You don't know anything about it.
13 A. No.
14 Q. Were you ever interviewed by the Department
15 of Children & Family Services during the 1990s.
16 A. One lady had come over to the East L.A.
17 apartment.
18 Q. Do you know approximately when that was.
19 A. No, I don't.
20 Q. Okay. Were you interviewed.
21 A. I don't remember if I was.
22 Q. Do you know if Gavin was interviewed.
23 A. I don't remember if any of us were. I know
24 she spoke to my mom; but I don't know if we were
25 interviewed. I don't remember.
26 Q. Did you ever talk to your mom about that
27 event.
28 A. No. 872

1 Q. Ever discussed it with your mom.
2 A. No.
3 Q. You don't know what happened.
4 A. I don't remember.
5 Q. Okay. Now, at some point you reported your
6 father to the Los Angeles police, right.
7 A. Yes, I did.
8 Q. Okay. Did you ever discuss with your mother
9 in advance what you were going to say to the police.
10 A. No, I didn't.
11 Q. Never talked about it at all with her.
12 A. I kept it to myself for a couple days,
13 because I was scared.
14 Q. Okay.
15 A. Still scared of him. And then I told her
16 what happened. And then she told me we should tell
17 the police.
18 Q. Okay. And did you call the police.
19 A. She called the police, and then the
20 detective came over.
21 Q. Okay. You told the police that you were
22 being abused five times a week -- five times a week,
23 right.
24 A. We were abused every day, more than once, by
25 my father.
26 Q. Okay. Were you there when your mother was
27 interviewed.
28 A. I -- I don't remember if she was 873

1 interviewed. I just remember the detective coming
2 to the East L.A. apartment.
3 Q. Okay. And did you accuse your father of
4 falsely imprisoning you.
5 A. Yes, I did.
6 Q. Okay. And to your knowledge, did your
7 mother accuse your father of falsely imprisoning
8 her.
9 A. Not that I remember.
10 Q. Okay. And did you accuse your father of
11 terrorist threats.
12 A. Yes, I did.
13 Q. Did your mother accuse your father of
14 terrorist threats.
15 A. Not that I remember.
16 Q. All right. And you accused your father of
17 willful harm to a child, right.
18 A. I don't know what that is.
19 Q. Okay. Okay. But were you present when your
20 mother told the LAPD that your father had molested

21 you.
22 A. No, but I had heard when he had asked her,
23 "If you want to get anything off your chest," and
24 she said, "Yes," and that's when they went to the
25 kitchen area of the East L.A. apartment.
26 Q. But when you were interviewed by the police,
27 you never told them your father had molested you,
28 did you. 874

1 A. Because they weren't asking me about that,
2 and I didn't know. I was very young.

3 Q. Okay. Okay.

4 Have you ever discussed with your mother
5 what your father did to you.

6 A. They were both present that day.

7 Q. Okay.

8 A. He had -- she had said, "Well, I never told
9 Davellin that." And he says, "Well" -- he said,
10 "Well, she doesn't need to know anyways."

11 It was just a horrible experience for me to
12 find out that he did that to me when I was young.

13 Q. And you found that out through your mother.

14 A. From both of them. Because he had agreed to
15 it when I was standing right there. Because they
16 were having an argument, and my mom screamed it out
17 at him.

18 Q. And your father agreed he had done that.

19 A. Yeah.

20 Q. Do you want to take a second.

21 A. I'm fine.

22 Q. Do you want to wait one second.

23 A. I'm okay.

24 Q. Ready to go.

25 A. Yeah.

26 Q. Are you aware that your mother claimed that
27 security guards at J.C. Penney sexually assaulted
28 her. 875

1 A. I wasn't there. I don't know anything about
2 that case. I was not involved in that case. All I
3 know is that Gavin complained of his elbow and
4 started complaining of his head, because I picked
5 him up with my grandparents. That's all I know
6 about it.

7 Q. Have you ever discussed that case with your
8 mom.

9 A. Never.

10 Q. Never talked about it at all.

11 A. Never.

12 Q. Okay. Have you discussed that case with

13 Gavin ever.
14 A. Never.
15 Q. Okay. Do you know even what your mother was
16 claiming.
17 A. I don't, really. I was not involved in that
18 case. I had nothing to do with that case. I don't
19 know anything of that case.
20 Q. But when your mother filed a suit, did she
21 talk to you about it.
22 A. She didn't, really. We didn't really talk
23 about it.
24 Q. Okay. Okay. And Gavin never talked to you
25 about it either.
26 A. No.
27 Q. But to your knowledge, Gavin was involved in
28 that. 876

1 A. I know that Gavin, my mom, and David and my
2 mom -- Gavin, Star, David and -- Gavin, Star, David
3 and my mom were all involved in it. That's all I
4 know.
5 Q. And you don't know what they were claiming
6 happened at J.C. Penney.
7 A. I don't know details. I don't know
8 anything. It was too long ago and I wasn't involved
9 in it.
10 Q. And you haven't discussed it with anyone in
11 the last year, correct.
12 A. No.
13 Q. Okay. To your knowledge - and I'm only
14 asking what you know - who made contributions to
15 help Gavin pay for medical bills.
16 A. We never asked anybody for medical bills, to
17 help pay for it.
18 Q. Never did. Never asked Chris Tucker.
19 A. Never asked him for help.
20 Q. Never asked Louise Palanker.
21 A. We have medical insurance. We don't need
22 help with our medical bills.
23 Q. Did you ever ask Louise Palanker.
24 A. No.
25 Q. Ever ask Chris Tucker.
26 A. No.
27 Q. Were the fund-raisers at The Laugh Factory
28 for medical expenses. 877

1 A. I don't know. I was too young. I don't
2 know.
3 Q. Have you ever discussed the purpose of those
4 fund-raisers with your mom.

5 A. I don't know. You'll have to ask David.
6 Q. Did you ever discuss those fund-raisers with
7 your mom.
8 A. No.
9 Q. Did you ever see an ad in a newspaper in
10 El Monte which said that Gavin's chemotherapy
11 treatments cost \$12,000 apiece. Did you ever see
12 that ad.
13 A. I don't remember about that. All I remember
14 is Gavin's picture. I don't remember anything that
15 was in the newspaper.
16 Q. Okay.
17 A. It was too long ago.
18 Q. Okay. Do you ever remember police officers
19 in Los Angeles having a fund-raiser to raise money
20 for Gavin's medical bills.
21 A. They didn't have a fund-raiser for us. What
22 the Los Angeles Police Department did was, Officer
23 Lassak brought his old Christmas tree for us. And
24 that's all I remember them doing.
25 Q. Do you know who spoke to them about Gavin's
26 health.
27 A. Officers.
28 Q. Yes. 878

1 A. Officer Lassak spoke to the police
2 department about it.
3 Q. Who is Officer Lassak.
4 A. I met him through my LAPD Explorers.
5 Q. He was a friend of your mom, right.
6 A. He was a friend of the family, yes.
7 Q. Okay. And you -- the last couple of years,
8 you've spoken to him from time to time.
9 A. I haven't spoke to him.
10 Q. Did you ever see your mother speak to him.
11 A. I haven't seen her speak to him. I work.
12 I'm a full-time student and full-time worker.
13 Q. Do you have any knowledge of your mother
14 speaking to Andrew Lassak of the LAPD.
15 MR. SNEDDON: Excuse me, Your Honor. I'm
16 going to object. At what point in time. Vague.
17 MR. MESEREAU: Sure. I'll rephrase it, Your
18 Honor.
19 Q. During the period of time, say, from January
20 to June of 2003, do you recall ever seeing Andrew
21 Lassak.
22 A. I don't -- the last time I saw him, we were
23 living at the East L.A. apartment and I was still
24 involved in Explorers.
25 Q. And approximately when was that, if you
26 know.
27 A. I don't remember. In the year 2001. I

28 don't remember. 879

1 Q. Do you know if your mother was in contact
2 with Andrew Lassak during 2003.
3 A. I know he would come and visit us once in a
4 while, but I don't know.
5 Q. Do you know about your mother approaching
6 Andrew Lassak about raising money to pay for Gavin's
7 medical expenses.
8 A. She never approached him that way.
9 Q. Now, how do you know that.
10 A. Because that never happened.
11 Q. It never happened.
12 A. No.
13 Q. And you're not aware of any LAPD police
14 officers trying to raise, you know, funds to pay
15 Gavin's medical expenses.
16 A. No. Not that I remember. Not that I know
17 of.
18 Q. Did you know anything about Chris Tucker
19 sending \$2,000 to your mom.
20 A. No. I don't know that.
21 Q. Did you ever discuss that with Chris Tucker.
22 A. No. We're not going to bring up anything
23 like that.
24 Q. Do you know if Fritz Coleman helped arrange
25 to raise any money for Gavin's medical expenses.
26 A. I don't know. Our medical bills are paid by
27 insurance. I don't know --
28 Q. And I agree with you on that. That's why I 880

1 have to ask you about this.
2 Did Fritz Coleman ever get involved in a
3 fund-raiser for Gavin at The Laugh Factory.
4 A. I didn't know about the fund-raisers. The
5 only one that I know is the one I met Chris at.
6 Q. At The Laugh Factory, right.
7 A. Yes.
8 Q. The fund-raiser to pay for Gavin's medical
9 costs, right.
10 A. I guess it was a fund-raiser. But it was
11 just like a graduation, like we had. It didn't look
12 like a fund-raiser or anything. It just looked like
13 a get-together.
14 Q. Okay. You indicated yesterday that Mr.
15 Jackson gave you presents, as the prosecutor
16 described it, that you used at the police academy,
17 right.
18 A. Yes. The car.
19 Q. Okay. Now, how did you use Mr. Jackson's

20 car at the police academy.
21 A. My mom would drive me from the East L.A.
22 apartment to my police academy.
23 Q. Okay. Do you know who approached Mr.
24 Jackson about giving your family a car.
25 A. I don't know.
26 Q. Do you know if your mother did it.
27 A. I don't know.
28 Q. Do you know if Gavin did it. 881

1 A. I don't know.
2 Q. Okay. But certainly, to the extent that car
3 was used with the police academy, it was to help
4 you, right.
5 A. Well, I know when the car was given, it was
6 given for Gavin.
7 Q. Okay.
8 A. For his doctors' appointments.
9 Q. Okay. And it was also used to take you to
10 the police academy.
11 A. That was after. I didn't join the LAPD
12 Explorers until 2001, I think.
13 Q. So as far as you know, the car was used for
14 both purposes, to help Gavin get to the hospital and
15 you to get to the police academy; is that right.
16 A. It was given for Gavin.
17 Q. How do you know that.
18 A. Because that's when Gavin was getting
19 chemotherapy, and that's what I had heard --
20 Q. Okay.
21 A. -- from David.
22 Q. Okay. Did your mother ever discuss that
23 with you.
24 A. No.
25 Q. Never talked to you about where the car came
26 from.
27 A. I knew it came from Mr. Jackson, and I knew
28 it was for Gavin's doctors' appointments. 882

1 Q. Did your mother ever discuss that with you.
2 A. No.
3 Q. Never talked to your mother about why the
4 car was given to your family.
5 A. No, I heard it through David or Gavin,
6 because they were the ones that were at the
7 hospital. They're the ones that would go to
8 Neverland mostly. Mom never went to Neverland, only
9 that first visit, and then this --
10 Q. Now, who would take you to the police
11 academy in the car that Mr. Jackson gave your

12 family.
13 A. My mom.
14 Q. And that was a white Bronco; is that right.
15 A. Yes.
16 Q. I'd like to ask you just how much of a
17 friend your family was with Chris Tucker. Did you
18 guys hang out a lot together.
19 A. Yeah, he invited us to his brother's
20 wedding.
21 Q. Okay. And approximately when was that.
22 A. I don't remember.
23 Q. And did you go other places with him.
24 A. He would take us to the Oakland game. He
25 would take us -- he would ask us to come visit him
26 at his house. I slept over Aja's house one time.
27 We were really close with them.
28 Q. Do you know approximately when your 883

1 friendship seemed to fall off with them.
2 A. When this started. This whole thing.
3 Q. Okay. Did you try to contact them, and they
4 just didn't respond, or --
5 A. No, we just -- nobody did.
6 Q. Okay. Now, I believe you said that
7 approximately a year passed between your first visit
8 to Neverland and your second; is that right.
9 A. That's from what I remember. I don't know.
10 Q. You told the jury about your being on a
11 plane with Chris Tucker, right.
12 A. Yes. There's two separate occasions, yes.
13 Q. And what was the first occasion that you
14 were on a plane with Chris Tucker.
15 A. We went to the Oakland Raider game.
16 Q. Okay. And the second one was when you and
17 Chris Tucker and your family went to Miami, right.
18 A. My mom and my brothers and me and Chris
19 Tucker went to Miami in the private jet.
20 Q. All right. And did you think you were
21 going to Miami on Chris Tucker's plane against your
22 will.
23 A. No. They just said -- to our knowledge, we
24 thought we were going for a press conference.
25 Q. And what was the press conference supposed
26 to be about, to your knowledge.
27 A. I don't know.
28 Q. Do you know if it was supposed to be about 884

1 Bashir.
2 A. I don't know. All I know is there was
3 supposed to be a press conference.

4 Q. But no one told you what it was going to be
5 about, to your knowledge.
6 A. No.
7 Q. And was it your understanding your mother
8 wanted to be in a press conference.
9 A. She never asked for it. They're the ones
10 that told us.
11 Q. They told you to get on Chris Tucker's plane
12 and go to Florida.
13 A. They asked us to come to Miami, and that
14 there was going to be a press conference over there.
15 Q. Okay. How long were you in Miami, if you
16 remember.
17 A. A couple of days. I don't remember.
18 Q. And after those couple of days were over,
19 you got on a plane with Mr. Jackson and his family
20 to come back, right.
21 A. Do you want me to specify who was on the
22 plane.
23 Q. We'll get into that. Sure. Sure. But
24 basically the flight to Miami was with Mr. Tucker.
25 A. Yes.
26 Q. And the flight back was with Mr. Jackson,
27 right.
28 A. Yes. And all his people, yes. 885

1 Q. And there were a couple of days in between
2 in Florida, right. A couple of days in between in
3 Miami, right.
4 A. Yeah.
5 Q. Okay. All right. How many nights do you
6 think you spent in Miami.
7 A. A couple. I don't know. I don't remember.
8 Q. Just a couple.
9 A. I don't remember.
10 Q. All right. Now, on the flight back, Mr.
11 Jackson was on the flight, right.
12 A. Yes.
13 Q. His son, right.
14 A. Yes.
15 Q. And just what is his name.
16 A. Prince.
17 Q. And how old was Prince at the time; do you
18 know.
19 A. I don't remember. Very young, though.
20 Q. He was a little kid, wasn't he.
21 A. Yes.
22 Q. There were two nannies on the plane, right.
23 A. Yes.
24 Q. Grace, right.
25 A. Yes.
26 Q. She was a nanny, right.

27 A. Yes.
28 Q. And who was the other one; do you remember. 886

1 A. I don't remember who.
2 Q. But there was a second nanny, right.
3 A. Yes.
4 Q. And you said that Mr. Jackson's doctor was
5 on the plane, right.
6 A. Yes.
7 Q. You don't remember his name, do you.
8 A. I don't remember his name.
9 Q. Okay. Did you meet him in Florida when you
10 were there.
11 A. We met him -- where I remember meeting him
12 was when we got in the car to go to the jet to go
13 back to Neverland.
14 Q. Okay. All right. You said that Marie
15 Nicole was on the plane, right.
16 A. Yes.
17 Q. And you said that Aldo was on the plane.
18 A. Yes.
19 Q. Your mom was on the plane.
20 A. Yes.
21 Q. You were on it, of course.
22 A. Yes.
23 Q. And Gavin and Star, right.
24 A. Yes.
25 Q. And was it your understanding that was a
26 private chartered plane.
27 A. Yeah.
28 Q. The group you've just identified, they were 887

1 the only ones on that plane, right.
2 A. Other than the flight attendant and the
3 pilot.
4 Q. Okay. And were most of the seats taken, as
5 far as you remember.
6 A. Yeah.
7 Q. Were they all taken, as far as you remember.
8 A. Yeah.
9 Q. When you were in Miami, you said you visited
10 Mr. Jackson's suite, right.
11 A. We stood in Mr. Jackson's suite the whole
12 day, yeah.
13 Q. Was that just one day or a second day; do
14 you know.
15 A. I don't really know, I'm not sure, but when
16 we were there, we went straight up to the suite and
17 stood there all day.
18 Q. But it was no more than two days, right.

19 A. Yeah, I think. I don't know.
20 Q. So when you got there, there were two
21 nannies and three little kids, right.
22 A. Got where.
23 Q. To Miami.
24 A. Yes.
25 Q. Aldo, Marie Nicole.
26 A. Frank and Dieter were all in the room.
27 Q. Okay. But the children I'm talking about.
28 How many children, besides your family. 888

1 A. When we went right to the suite, Prince,
2 Paris and Prince II were there, and Marie Nicole and
3 Aldo were there.
4 Q. So Prince and Paris are Michael Jackson's
5 children, right.
6 A. Yes.
7 Q. A boy and a girl.
8 A. Yes.
9 Q. And they were with him in his suite, right.
10 A. Yes.
11 Q. Did you ever see Prince and Paris at
12 Neverland when you visited.
13 A. Yes.
14 Q. And to your knowledge, where were Prince and
15 Paris living at Neverland.
16 A. In their room. Upstairs in the main house.
17 Q. Did you ever see Mr. Jackson with Prince and
18 Paris.
19 A. Yes. A couple of times, yes.
20 Q. Would you see him walking around the
21 property with them.
22 A. Not really.
23 Q. Would you see him in his house with them.
24 A. He would go up to the room and see them,
25 yes.
26 Q. You've been to every room in Mr. Jackson's
27 house, haven't you.
28 A. Yeah. 889

1 Q. You've seen them all, right.
2 A. From -- yeah, I guess.
3 Q. Have you ever seen Prince and Paris's room
4 in Mr. Jackson's house.
5 A. Yes. It's upstairs.
6 Q. Did you see those rooms the first time you
7 visited Neverland.
8 A. No, I didn't.
9 Q. Did you see them the second time you visited
10 Neverland.

11 A. No, I didn't. I saw them when he had come
12 back from Miami.
13 Q. Okay. Can you describe Prince and Paris's
14 room.
15 A. I don't remember. All I know is where it
16 was at. I don't remember all the little details,
17 because I was only in there for about only one --
18 maybe 15 minutes, and that was the only time that I
19 went in there.
20 Q. You did describe for the jury Mr. Jackson's
21 room --
22 A. Yes.
23 Q. -- in his main house, right.
24 A. Yes.
25 Q. Before you testified yesterday, did you go
26 over that description with anyone.
27 A. A week before.
28 Q. Who did you go over that description with. 890

1 A. I don't remember who it was.
2 Q. Was it a sheriff.
3 A. I don't remember who it was.
4 Q. Was it Mr. Sneddon.
5 A. I don't remember who it was.
6 Q. Was it in the last two weeks; do you know.
7 A. I don't think so.
8 Q. Did anyone show you before yesterday the
9 tape of Mr. Jackson's home.
10 A. The tape. What tape.
11 Q. Well, there was a tape played in this court
12 which showed certain parts of Neverland, including
13 Mr. Jackson's room.
14 A. I have never seen a tape.
15 Q. Never seen that.
16 A. No.
17 Q. Did anyone show you any photographs of
18 Mr. Jackson's room before yesterday.
19 A. The ones that I identified. They're the
20 ones that they put up here, yes.
21 Q. Now, who showed you those photographs before
22 yesterday.
23 A. Mr. Sneddon.
24 Q. Okay. And did you discuss what you
25 remembered being in that room with Mr. Sneddon.
26 A. Yes.
27 Q. Did he show you the photos of the room while
28 you were discussing this with him. 891

1 A. I don't know when they were shown, but I
2 know it was some point.

3 Q. Have you ever been into any of Mr. Jackson's
4 closets.
5 A. Not that I know of, no.
6 Q. And have you been into Mr. Jackson's
7 bathroom.
8 A. Just saw it, yeah.
9 Q. When did you see it.
10 A. When I went in that one time.
11 Q. Did you use the bathroom.
12 A. No.
13 Q. Did someone take you into the bathroom.
14 A. No, I was walking around in the downstairs
15 of it, just looking. Because it had been the only
16 time I've been in there, so I was just looking
17 around.
18 Q. So you were just alone looking around in
19 Mr. Jackson's room.
20 A. No, I wasn't alone in the room.
21 Q. I'm sorry.
22 A. I wasn't alone in the room.
23 Q. Who were you with.
24 A. I was just walking around.
25 Q. Who were you walking around with.
26 A. I wasn't walking around with nobody. They
27 were sitting down and playing. There was, like, a
28 little arcade game in there. And they were playing 892

1 that and listening to music. And I was just looking
2 around.
3 Q. In Mr. Jackson's room.
4 A. Yes, on the downstairs.
5 Q. Okay. And approximately when was that, if
6 you know.
7 A. I don't know.
8 Q. Was it the first time you visited.
9 A. No.
10 Q. Was it the last time you visited.
11 A. I don't remember when. But it was after
12 Miami.
13 Q. After Miami.
14 A. Yes.
15 Q. So you had never seen Mr. Jackson's room
16 till after Miami.
17 A. Yes.
18 Q. You had never been on a tour of the house.
19 A. Not in his room, no. We had just saw the
20 library and the -- the kitchen and stuff. But we
21 never went in his room.
22 Q. Do you know someone named Rio.
23 A. No.
24 Q. Do you know named Simone.
25 A. No. I don't remember.

26 Q. Did you ever share a room at Neverland with
27 any other children.
28 A. I was always by myself. I slept by myself. 893

1 Q. Did you ever play with any other children at
2 Neverland.

3 A. I remember some came, but I was mainly by
4 myself. I don't remember.

5 Q. So the name Rio doesn't ring a bell.

6 A. I don't remember.

7 Q. The name Simone doesn't ring a bell, right.

8 A. I don't remember.

9 Q. Did you and your brothers ever go to the zoo
10 area at Neverland.

11 A. I was hardly ever with my brothers. If I
12 wanted to go, I would go in the little cart.

13 Q. Okay. Did you ever go to the zoo area at
14 Neverland.

15 A. Yeah.

16 Q. Did you ever go with your brothers.

17 A. No.

18 Q. Always alone.

19 A. Well, sometimes I would go with Marie
20 Nicole. But I was mainly by myself.

21 Q. The first time you visited Neverland, was
22 Marie Nicole there.

23 A. No, she wasn't.

24 Q. When did you first see Marie Nicole at
25 Neverland.

26 A. After we got back from Miami.

27 Q. Okay. When you were in Miami, do you recall
28 your mom ever discussing the Bashir documentary. 894

1 A. No. We just knew that it was being aired.
2 And we weren't allowed to see it, but we didn't
3 discuss it.

4 Q. Did you ever discuss it with your mom.

5 A. No.

6 Q. Did you ever talk to your mom about the fact
7 that you appeared in that documentary.

8 A. She knew we had got filmed, so I guess we
9 knew that we would be on there.

10 Q. Did you ever discuss that with her.

11 A. No.

12 Q. Did you ever discuss the fact that Gavin was
13 on that film with your mother.

14 A. We didn't know that it was going to be aired
15 until, like, the press came. We just thought it was
16 like a personal video.

17 Q. Okay. So you've never really discussed with

18 Gavin what appears in that documentary.
19 A. No. Well, when they were filming it, I was
20 standing right there. So....
21 Q. Did you meet Mr. Bashir.
22 A. Yes.
23 Q. And was the day of the taping the first time
24 you met Mr. Bashir.
25 A. Yes.
26 Q. Did you ever discuss what Mr. Bashir was
27 doing with him.
28 A. No. We didn't talk to Mr. Bashir. We just 895

1 said hi.
2 Q. Okay. But after you and Gavin and Star were
3 taped, did you go home and discuss what happened
4 with your mom.
5 A. We just told her that we got filmed, but we
6 thought it was just one of his personal videos.
7 Q. Okay. And when you say "personal video,"
8 what are you talking about.
9 A. Like because Gavin had been taped before,
10 during his cancer, with Star. And it was just a
11 personal video, like for Mr. Jackson.
12 Q. And that was a personal video about Gavin's
13 recovering from cancer, right.
14 A. No, this was during his cancer.
15 Q. But it was about him trying to recover from
16 it, wasn't it.
17 A. I don't know.
18 Q. Did you ever see it.
19 A. I just saw it once.
20 Q. Where did you see it.
21 A. At Hamid's house.
22 Q. Okay. Now, you indicated that Ronald was in
23 Florida, right.
24 A. Yes.
25 Q. Did you talk to him.
26 A. Just to be introduced.
27 Q. Okay. And was Frank in Florida, too.
28 A. I know he came later on, like later on in 896

1 the day, the first day that we got there.
2 Q. But correct me if I'm wrong, yesterday you
3 said that Mr. Jackson had a room in his suite,
4 right.
5 A. Yes.
6 Q. There were other rooms in the suite, right.
7 A. No, there's not other rooms in the suite.
8 There's just one in the suite. And then there was a
9 connecting room that was -- that was another hotel

10 room, but they had the doors open, so it connected
11 it.

12 Q. With another whole tower.

13 A. There was another hotel room connected to
14 Mr. Jackson's suite, so they had that door open.

15 Q. And you indicated that, for most of the day,
16 people were going in and out, right.

17 A. Yeah, Mr. Dieter and Ronald would.

18 Q. And Marie Nicole and Aldo were there too.

19 A. Yes.

20 Q. And Mr. Jackson's children were there too.

21 A. They left after a while. They weren't there
22 the whole time.

23 Q. But they were there a lot of the time,
24 weren't they.

25 A. A good amount.

26 Q. And the nannies were with them, right.

27 A. Yes.

28 Q. Now, you testified yesterday and today, that 897

1 you saw behavioral changes in Gavin at some point,
2 right.

3 A. Yes.

4 Q. Have you ever discussed those behavioral
5 changes with Mr. Sneddon.

6 A. He just asked me if there was anything
7 different about Gavin.

8 Q. And when was that.

9 A. A while ago.

10 Q. Did you ever discuss what you were going to
11 say in court today about those behavioral changes.

12 A. No.

13 Q. Let me ask you this: Were you ever aware
14 that Gavin had a lot of disciplinary problems in
15 school.

16 A. I know he would talk a lot, yeah.

17 Q. Were you ever aware that teachers were upset
18 because he would get up in class and disrupt the
19 courtroom -- the classroom.

20 A. He was very talkative, yes.

21 Q. Well, he was described as disruptive, wasn't
22 he.

23 A. Yeah, he would get very talkative. He would
24 get very talkative, that's what his problem was.

25 Q. He was described by his teachers as getting
26 up in the middle of class and disrupting the class,
27 right.

28 A. Well, I don't know -- 898

1 MR. SNEDDON: Your Honor, I'm going to

2 object as asked and answered. Lack of foundation,
3 if she has any personal knowledge of this.
4 THE COURT: Sustained on foundation.
5 Q. BY MR. MESEREAU: Do you have any knowledge
6 yourself of Gavin having disciplinary problems in
7 school before he ever met Mr. Jackson.
8 A. I knew he was very talkative. That's all I
9 know of. I was very young.
10 Q. On the rebuttal tape, Gavin mentions gang
11 signs; do you remember that.
12 A. I don't know.
13 Q. Well, you saw the rebuttal tape, right.
14 A. Yeah, I heard of it. I heard that. But I
15 don't think it was Gavin that said it. My mom said
16 it. She was just playing around with Gavin.
17 Q. Your mother was playing along with Gavin
18 when your mother mentioned gang signs.
19 A. No, because Gavin was messing with his
20 hands.
21 Q. Yes.
22 A. And I think that's what it was. And I think
23 my mom was just playing with him, saying, "Stop
24 throwing those gang signs."
25 Q. To your knowledge, has Gavin ever been
26 associated with anybody in a gang.
27 A. No.
28 Q. Never at all, right. 899

1 A. Never.
2 Q. Okay. And you've never seen Gavin make a
3 gang sign, right.
4 A. No, he's a good boy.
5 Q. Okay. How did you learn Gavin was having
6 problems with his conduct at school.
7 MR. SNEDDON: I'm going to object as lack of
8 foundation.
9 MR. MESEREAU: I think she said she knew,
10 Your Honor.
11 THE COURT: Sustain the objection.
12 MR. MESEREAU: Okay.
13 Q. Did you ever discuss with your mother the
14 fact that Gavin was having any problems at school.
15 A. I don't remember.
16 Q. Okay. So you don't remember ever having a
17 discussion like that.
18 A. All I know is that I would tell Gavin, you
19 know, "Just be quiet and listen to what the teachers
20 tell you." That's all I know. All I know is Gavin
21 talks a lot.
22 Q. To your knowledge, was he ever asked to
23 leave school.
24 A. I don't know.

25 Q. You don't know.
26 A. I don't know. I was young. I wasn't really
27 paying attention to his school.
28 Q. Okay. So as you sit here today, you know 900

1 nothing about Gavin ever being asked to leave
2 school, right.

3 A. No, I don't know that.

4 Q. Never heard anything about that.

5 A. No.

6 Q. Okay. Now, in Miami, you said you got a
7 manicure and a pedicure.

8 A. Yes.

9 Q. And I think you said Chris Tucker, Gavin and
10 Star got massages, right.

11 A. Yes.

12 Q. And that was before you got on the plane to
13 go back, right.

14 A. Yeah, that was right before we left.

15 Q. Do you know who paid for those pedicures,
16 manicures and massages.

17 A. Yes, Mr. Jackson did. They were charged to
18 the room.

19 Q. Okay.

20 A. Or -- Mr. Tucker's was charged to his room.

21 I don't know, really. But I think Mr. Jackson paid
22 for my pedicure, but I don't know about the
23 massages.

24 Q. How did you know who charged what to their
25 rooms.

26 A. Because they had given us, like, a little
27 thing to take and say that it was fine to charge it
28 to the room. 901

1 Q. Okay. Now, I'd like to just get straight in
2 my mind, if I can, the schools you mentioned
3 yesterday that you went to.

4 A. Yes.

5 Q. You mentioned Hollywood High, right.

6 A. Yes.

7 Q. Now, when did you go to Hollywood High.

8 A. For my freshman and half of my sophomore
9 year.

10 Q. So what years would that be.

11 A. 2000, 2001.

12 Q. And when did you go to Mountain View.

13 A. Mountain View was the beginning of -- it
14 was -- part of my junior year, like the ending part,
15 and then my senior year was there.

16 Q. Did you mention a third school.

17 A. Yes, I did.
18 Q. Which one was that.
19 A. That was Roosevelt.
20 Q. When did you go to Roosevelt.
21 A. I went to Roosevelt in between my sophomore
22 year and my junior year.
23 Q. For how long.
24 A. Part of my sophomore, and part of my junior.
25 Q. Okay. Now, did you move to these schools
26 because you had moved your home.
27 A. No, because -- I left Hollywood High School
28 because my father didn't leave me alone. 902

1 Q. Okay.
2 A. So I had to move.
3 Q. Okay. And you went from Hollywood.
4 A. To Roosevelt.
5 Q. To Roosevelt. And where in Los Angeles was
6 Roosevelt.
7 A. Like five minutes away from the Soto
8 apartment. It was that high school for that
9 address.
10 Q. Okay. And I gather your father didn't come
11 to that school to see you, right.
12 A. Not that I remember, no.
13 Q. But you were concerned that he was coming to
14 Hollywood High to see you.
15 A. No, he was coming to Hollywood High. That's
16 why I left.
17 Q. Okay. Okay.
18 When you were at Hollywood High, were you
19 living at Soto.
20 A. Yes, I was.
21 Q. When you were at Mountain View, were you
22 living at Soto.
23 A. No, I wasn't. I was living with my
24 grandparents.
25 Q. Okay. Yesterday you put little notations on
26 a large diagram of the interior of the plane --
27 A. Yes.
28 Q. -- remember. 903

1 Had you gone over that diagram before you
2 testified.
3 A. I have said where I saw everybody sit, and I
4 had seen the diagram before.
5 Q. And who had showed it to you.
6 A. Mr. Sneddon was sitting there. I know there
7 was somebody else. But --
8 Q. And do you know approximately when that was.

9 A. I don't remember when it was.
10 Q. Did someone tell you, "This is a diagram of
11 the interior of that plane".
12 A. "This is a diagram of the description that
13 you've given us of the plane," yes.
14 Q. Who told you that.
15 A. Mr. Sneddon, I think. I don't remember.
16 Q. And you don't know if that diagram is
17 completely accurate, do you.
18 A. That's from what I saw, so --
19 Q. Who put the diagram together.
20 A. I don't know.
21 Q. Okay. You hadn't been on that plane since
22 when, January of 2003, February of 2003.
23 A. It was for Miami, so I don't know.
24 Q. All right. So correct me if I'm wrong,
25 Mr. Sneddon said to you, "Here's a diagram of the
26 interior of the plane," right.
27 A. "Of what you described."
28 Q. Okay. And did he have you, in front of him, 904

1 start marking off where people sat.
2 A. No.
3 Q. He didn't.
4 A. No.
5 Q. So the first time you did it was yesterday.
6 A. Yes.
7 Q. Okay. And when Mr. Sneddon put it in front
8 of you, he never said, "Tell me where people were
9 sitting".
10 A. From what I remember, "Where do you think
11 they were sitting."
12 Q. Okay. All right. Was this during that
13 short meeting you had a couple days ago.
14 A. Yes.
15 Q. And Mr. Sneddon and you agree that was only
16 a 15-minute meeting.
17 A. Yeah. There was two meetings and they were
18 both pretty short.
19 Q. With Mr. Sneddon.
20 A. Well, Mr. Sneddon, and then Mr. Robel would
21 come in. It was an open area. It was right in
22 front of the kitchen.
23 Q. Okay. Now, you indicated yesterday that at
24 some point on the plane, Mr. Jackson gave Gavin his
25 watch, right.
26 A. Yes.
27 Q. And you said at some point on that plane
28 trip, Mr. Jackson gave Gavin his jacket. 905

1 A. Yes.
2 Q. All right. Now, was this after Mr. Jackson
3 had given the family an automobile.
4 A. Yes. The automobile was given during
5 Gavin's cancer. That was -- the watch and the
6 jacket were on the plane.
7 Q. Okay. And you indicated you saw some
8 whispering between Mr. Jackson and Gavin, but you
9 didn't hear what it was.
10 A. No, they were whispering and they were
11 passing the Diet Coke can back and forth.
12 Q. And you have no idea if Gavin asked Mr.
13 Jackson for a watch, because you couldn't hear,
14 correct.
15 A. All I know is that Mr. Jackson gave it to
16 him.
17 Q. Okay. And at some point, I believe you said
18 that it was Ronald who wanted the watch from you,
19 your family.
20 A. No, Dieter was the one that wanted it back.
21 Q. Was that at Neverland.
22 A. Yes, it was.
23 Q. So Dieter appeared upset that Mr. Jackson
24 had given Gavin a watch, right.
25 A. Yeah.
26 Q. All right. Did Dieter ever try to get the
27 car back.
28 A. I didn't meet Dieter at that time. 906

1 Q. When did you first meet Dieter.
2 A. At Miami.
3 Q. All right. And was this in the suite.
4 A. Yes, it was.
5 Q. When did you first see Dieter try and get
6 that watch back.
7 A. We were all together in one of the guest
8 rooms. And he was asking Gavin for the watch back.
9 Q. And Mr. Jackson wasn't there, right.
10 A. No.
11 Q. You did say yesterday, in response to the
12 prosecutor's question about the plane, that people
13 would switch their seats around, remember.
14 A. Yeah, that would be Star, Aldo and Marie
15 Nicole that would switch their seats around.
16 Q. Did you ever see -- excuse me. I'm sorry.
17 Let me rephrase that. Strike that.
18 Did you ever see Aldo and Marie Nicole
19 switch their seats around.
20 A. Yeah, they would switch back with Star.
21 They would go back and forth.
22 Q. Do you know where the doctor sat on the
23 plane.

24 A. He was in one of those four chairs that were
25 behind me. I don't remember where.
26 Q. Yesterday did you tell the prosecutor where
27 the doctor was seated.
28 A. No, I just wrote that he was in one of those 907

1 four seats.

2 Q. Okay. And he was with the two nannies,
3 right.

4 A. Yes. And my mom was sitting -- all those
5 four -- in those four seats were my mom, the doctor,
6 and the two nannies. I don't know how they were
7 seated or anything.

8 Q. Okay. And is it your recollection that
9 Mr. Jackson was facing the rear of the plane.

10 A. He was facing the front of the plane.

11 Q. Okay. And where were you facing.

12 A. I was facing the back of the plane, right in
13 front of Gavin.

14 Q. Okay. And who was next to you.

15 A. Paris was.

16 Q. All right. And the doctor was at the back
17 of the plane facing the front, to your knowledge.

18 A. I don't know where he was seated. All I
19 know is he was in those four chairs behind me.

20 Q. Okay. Gavin's illness lasted approximately
21 a year, right.

22 A. Yes.

23 Q. And he had a number of surgeries, right.

24 A. He had one major surgery.

25 Q. Okay. What was that for, if you know.

26 Didn't they remove the spleen.

27 A. They took out his spleen. They took out a
28 16-pound tumor. They took out lymph nodes. They 908

1 took out the -- that's all I remember. They took
2 out his kidney, because it was totally eaten by the
3 cancer. And that's all I remember.

4 Q. And when you said on the rebuttal tape that
5 you thought Mr. Jackson had helped him recover, were
6 you telling the truth.

7 A. I had said that. I don't remember saying
8 that.

9 Q. Okay. Do you ever remember your mother
10 saying Mr. Jackson had helped your brother recover
11 from cancer.

12 A. What do you mean.

13 MR. SNEDDON: Your Honor, I'm going to
14 object as to vagueness, as to when in point in time.

15 THE COURT: Point in time.

16 MR. MESEREAU: Sure, Your Honor. I'll
17 rephrase.
18 Q. Do you remember, on the rebuttal tape, your
19 mother saying that Mr. Jackson helped your brother
20 Gavin recover from cancer.
21 A. I know she said it on the rebuttal tape.
22 Q. Did you ever hear her say it any other time.
23 A. No, she owed all credit to God.
24 Q. So other than the rebuttal tape, you never
25 heard your mother ever say Mr. Jackson helped Gavin
26 recover from cancer.
27 A. Not that I remember.
28 Q. What about when Brad Miller was at Jay 909

1 Jackson's apartment.
2 A. I don't -- if she did, I don't remember. I
3 was young. It was too long ago.
4 Q. Okay. Now, when you arrived from Miami, you
5 were taken to Neverland Ranch, right.
6 A. Yes.
7 Q. And was that a limousine.
8 A. Yes.
9 Q. Do you know who drove that.
10 A. I don't remember.
11 Q. Okay. And when you got there, you said that
12 Dieter or Ronald were there, right.
13 A. No, they weren't.
14 Q. They weren't there.
15 A. They didn't get there until the next day, I
16 think.
17 Q. Okay. And you've never flown with them,
18 right.
19 A. No.
20 Q. Okay. When you left Neverland with Jesus
21 Salas, you were in a Rolls Royce, right.
22 A. Yes, we were.
23 Q. And your mother asked Jesus to take the
24 family back home, right.
25 A. Yes.
26 Q. And Jesus put you all in a Rolls Royce and
27 drove you to Los Angeles, right.
28 A. Yes, he drove us. I don't remember -- I 910

1 think he took us to my grandmother's house.
2 Q. Okay. And at some other point, the family
3 all went back to Neverland, right.
4 A. Yes.
5 Q. And approximately when was that.
6 A. Timewise, I don't know. It was so long ago.
7 Q. Okay. After you got back from Miami, if you

8 know, how many times did you go back and forth to
9 Neverland.
10 A. Twice, I think. I think it was twice.
11 Q. Twice.
12 A. Or three times. I don't remember.
13 Q. One time you went back with Aja, correct.
14 A. Yes.
15 Q. And Aja drove you to Neverland, right.
16 A. Yes.
17 Q. And did you ask her to drive you, or did she
18 just volunteer to, if you know.
19 A. Because we were going to be taken back
20 anyways, because we asked her to take us instead.
21 Q. Okay. When Aja drove you back to Neverland,
22 there was no security person in your car, true.
23 A. No.
24 Q. You mentioned to the jury at one point that
25 you were scared, right.
26 A. Yes.
27 Q. Okay. And when did you get scared, if you
28 remember. 911

1 A. Like --
2 Q. I'm talking about when you were at
3 Neverland.
4 A. Like after they started telling us about the
5 death threats and stuff.
6 Q. After what.
7 A. After they started telling us about the
8 death threats and how Dieter started getting more
9 aggressive.
10 Q. Dieter was getting more aggressive.
11 A. Yes.
12 Q. This is right after the Miami trip, right.
13 A. No. This is -- this is closer to the
14 rebuttal film.
15 Q. Okay. Okay. So you first started to get
16 scared around the time of the rebuttal film, right.
17 A. Yes.
18 Q. Now, you mentioned that Aja drove you back
19 to Neverland, right.
20 A. Yes.
21 Q. Was your mother in the car.
22 A. No, she wasn't.
23 Q. Where was she.
24 A. She was at Jay Jackson's apartment.
25 Q. Okay. When you were at Jay Jackson's
26 apartment to talk to the three social workers, your
27 mother never complained that you were being falsely
28 imprisoned, did she. 912

1 A. About what.
2 Q. About anything.
3 A. About falsely imprisoned with who.
4 Q. With Frank, with Vinnie, with Dieter, with
5 Konitzer, with Schaffel. Anybody.
6 A. No, we were kind of scared, because the
7 bodyguard was downstairs.
8 Q. Okay. But you never told any of the three
9 women from the Department of Children & Family
10 Services, "We need help," right.
11 A. Not that I remember, no.
12 Q. And your mother certainly never did that,
13 right.
14 A. Not that I remember, no.
15 Q. And you don't recall your mother ever
16 telling Aja, "Call the police; we're having
17 problems," right.
18 A. I remember there would be occasions that she
19 would call Aja. I don't know what they talked
20 about. And I did talk to Aja once when they were at
21 Neverland Ranch.
22 Q. And you never heard your mother ever call
23 the police, right.
24 A. I heard about an occasion, yes, that she
25 tried to.
26 Q. Okay. When was this.
27 A. I don't know when it was. But it was when
28 they were at the ranch. 913

1 Q. Okay. How about when you were at Jay
2 Jackson's house, an active member of the United
3 States Army who your mother was having a
4 relationship with. Do you recall your mother ever
5 saying anything like, "Major Jackson, call the
6 police". Do you ever recall that.
7 A. She had called, because she dialed up -- if
8 you press 9-1-1 at the Neverland Ranch, it goes to
9 their security.
10 Q. Right.
11 A. So she had to call Jay and ask him to call.
12 Q. How about when she was at Jay Jackson's
13 apartment.
14 A. Not that I remember, no.
15 Q. All right. You indicated that an
16 investigator named Bradley Miller took a recorded
17 statement from your whole family.
18 A. Yes.
19 Q. Right.
20 A. Yes.
21 Q. And that was at Jay Jackson's apartment,
22 right.

23 A. Yes, it was.
24 Q. And Jay Jackson was actually in and out,
25 wasn't he.
26 A. No, he was sitting right there.
27 Q. Okay. So you're at Jay Jackson's home, with
28 Jay Jackson sitting there, and an investigator is 914

1 taking a statement. And nobody complains about
2 Dieter, Konitzer, Frank, Vinnie, Schaffel, or
3 anybody, right.

4 A. I don't think it was at that point. He just
5 asked us to speak of things of my father.

6 Q. Okay. But I'm asking if your mother at that
7 point ever called the police or did anything that
8 suggested that Ronald, Dieter, Frank, Vinnie,
9 anybody was causing problems.

10 A. I guess -- I don't know. You have to ask
11 her what she thought.

12 Q. Okay. Okay. Now, when you were being
13 interviewed by Brad Miller, he asked you about
14 David, right.

15 A. Yes.

16 Q. And you talked about things like child
17 endangerment and terrorist threats, right.

18 A. I don't remember what I said. All I know is
19 I talked about David.

20 Q. Okay. You talked about abusive behavior by
21 him, right.

22 A. Yes, I did.

23 Q. Okay. Do you remember telling Brad Miller
24 that Michael is a father to all of you.

25 A. I don't remember what I said on the tape.

26 It was very long ago. All I remember is the key
27 point was on David.

28 Q. Okay. Do you remember telling Brad Miller 915

1 Michael has given your family safety, love, and
2 everything you've ever wanted.

3 A. I don't remember what I said. All I
4 remember is the key point was about David.

5 Q. Okay. Would it refresh your recollection if
6 I just showed you a transcript of what you said.

7 A. No, it wouldn't. I would have to hear my
8 own voice.

9 Q. You don't want to see this.

10 A. No, it's okay.

11 Q. Okay. Okay. Did your mother ever tell you
12 that, "We're being forced to make positive
13 statements about Michael Jackson in the interview
14 with Brad Miller".

15 MR. SNEDDON: Excuse me, Your Honor. I'm
16 going to object as to what point in time. Vague;
17 lack of foundation.
18 THE COURT: Sustained; time.
19 Q. BY MR. MESEREAU: We're talking about
20 Sunday, February 16th, 2003. Okay. And that's the
21 approximate time you were at Jay Jackson's apartment
22 being interviewed by Brad Miller, right.
23 A. You're asking me what.
24 Q. Well, I'm asking you if that sounds like the
25 approximate time you were interviewed by Brad
26 Miller.
27 A. I don't know the date. All I know is that
28 he came to Jay Jackson's house. 916

1 Q. Does February of 2003 sound around the time.
2 A. I don't know.
3 Q. Was it after your trip to Miami.
4 A. Yes, it was.
5 Q. Okay. Was it before the rebuttal video.
6 A. I don't remember.
7 Q. Do you think it was around the time of the
8 rebuttal video.
9 A. I don't think so.
10 Q. All right. But Jay Jackson sat at the
11 table.
12 A. We were seated in the living room.
13 Q. And Jay Jackson was sitting there during the
14 interview, right.
15 A. Yes, he was.
16 Q. Was he introduced to Brad Miller as a member
17 of the United States Army; do you know.
18 A. All I remember -- it's too long ago. All I
19 remember is us sitting on the blue couch. And
20 Bradley Miller had the tape-recorder on the table.
21 And he was asking us questions. And the main
22 subject was David.
23 Q. And Jay was just sitting there and
24 listening, right.
25 A. Yes, Bradley Miller said he didn't need him
26 to talk.
27 Q. Okay. So he just sat there and listened,
28 right. 917

1 A. Yes.
2 Q. And you complained about stories that were
3 being told about your brother, right.
4 MR. SNEDDON: Your Honor, I'm going to
5 object again as lack of foundation and vagueness as
6 to what point in time.

7 MR. MESEREAU: All my questions, unless I
8 tell you otherwise --
9 MR. SNEDDON: Well, that's not fair to the
10 witness.
11 MR. MESEREAU: I'm going to withdraw the
12 question and rephrase it, if you want to do that.
13 THE COURT: All right.
14 MR. MESEREAU: Okay.
15 Q. I'm going to ask you a number of questions
16 about the Brad Miller interview. All right.
17 A. Okay.
18 Q. I'm going to ask you questions about what
19 you said. All right.
20 A. Okay.
21 Q. And I'm going to ask you questions about who
22 was there.
23 A. Okay.
24 Q. And I've already asked you questions about
25 where it was. It was at Jay Jackson's apartment,
26 right.
27 A. Yes, it was.
28 Q. Okay. Who was there, besides Jay Jackson 918

1 and you.
2 A. My mom and my two younger brothers.
3 Q. And Brad Miller, of course was there, right.
4 A. Yes.
5 Q. And have you discussed that interview with
6 anyone with law enforcement.
7 A. We told them that we took the interview,
8 yes.
9 Q. Have you discussed that interview with your
10 mother at all.
11 A. No.
12 Q. Never have.
13 A. No.
14 Q. So ever since you had that interview, you've
15 never talked to your mom about it, right.
16 A. Not really, no. It was just strange because
17 he would stop and redo it and say, "That's not
18 necessary to talk about." He would rewind it. Stop
19 it. I mean, we talked about how strange that was.
20 Q. And did Jay Jackson ever say a word.
21 A. No, he never did.
22 Q. Did your mom ever complain about that.
23 A. I don't know. I don't remember.
24 Q. Okay. All right. Was it your understanding
25 that the purpose of the interview was to get your
26 feelings about Michael Jackson on tape.
27 A. I thought the purpose was about David.
28 Q. Was about David. 919

1 A. Yeah.
2 Q. But you and your mother and your brothers
3 kept referring to Michael Jackson as the father,
4 right.
5 A. I don't remember what I said. All I
6 remember is that the main focus was David.
7 Q. Okay. Now, when the rebuttal video was done
8 that we saw in court today --
9 A. Yes.
10 Q. -- was your mother still involved with Jay
11 Jackson, as far as you know.
12 A. Yes.
13 Q. Okay. Were they engaged at that point; do
14 you know.
15 A. No. I don't think so. They were still
16 dating.
17 Q. At that point in time, was Andrew Lassak, of
18 the LAPD, a friend of the family.
19 A. I don't think we talked to him at that
20 point. I don't remember.
21 Q. Okay.
22 THE BAILIFF: Mr. Mesereau, I'm going to
23 turn the air conditioner on. So will you speak up.
24 MR. MESEREAU: Oh. Sure.
25 Q. Did you think that Brad Miller didn't want
26 certain statements about David on the tape.
27 A. He didn't want certain statements about -- I
28 don't remember. All I know is he would rewind it, 920

1 and say, "That's not necessary, we don't need to
2 talk about that." And he would rewind it, tape over
3 it, stop it, and then, "We're going to talk about
4 this now," and that's what I remember. And then he
5 would stop and rewind it a lot.
6 Q. Did he ever tell you, if you remember, that
7 he worked for Mark Geragos.
8 A. No, I thought he was just from Mr. Jackson.
9 Q. Okay. At the beginning of that interview,
10 he says he works for Mr. Geragos, right.
11 A. I don't remember. All I remember is that he
12 was from Mr. Jackson.
13 Q. Okay. Have you discussed this issue with
14 your mother at any time.
15 A. No.
16 Q. Now, you knew that your mother was going to
17 testify in a pre-trial hearing in this case, right.
18 A. I knew she was coming up here, yes.
19 Q. Did you ever discuss what she was going to
20 be asked with her.
21 A. I didn't know what she was being asked. All

22 I know is that she came up here.
23 Q. Did you ever talk to her about what she said
24 after she appeared in court.
25 A. No.
26 Q. Ever discussed it one time with her.
27 A. Huh-uh.
28 Q. All right. At the time she testified in a 921

1 pre-trial hearing in this case, you were living with
2 her, right.

3 A. I've been living with them ever since I
4 started college.

5 Q. And you're not aware of you and your
6 brothers ever talking to her about what she said in
7 court that day, right.

8 A. No, I don't remember hearing her talk about
9 anything with the court.

10 Q. Do you recall her coming back home after she
11 testified in a pre-trial hearing in this case.

12 A. Yeah, I remember her coming home.

13 Q. Do you recall ever discussing what went on
14 with her.

15 A. No, we just greeted her, and that was it.

16 And the baby was there with her.

17 Q. And so everybody just agreed to be silent.

18 A. Yeah, we know we're not supposed to talk
19 about each other.

20 Q. Who told you that.

21 A. Well, they told us that.

22 Q. Who did.

23 A. Mr. Sneddon and everybody with law
24 enforcement.

25 Q. So you never discussed this case with each
26 other at all.

27 A. No, we know we're not supposed to.

28 Q. Okay. Okay. 922

1 MR. MESEREAU: Can I take a second.

2 Q. Around the time that you were visiting
3 Neverland, say in 2002, did you use a computer.

4 A. No, I never used a computer when I was up
5 there.

6 Q. Were you able to use a computer.

7 A. No.

8 Q. Did you ever use a computer at Carol Lamir's
9 home.

10 A. Once, because she had me doing her son's
11 project.

12 Q. Did you use a computer at her home.

13 A. Yeah. One time, yeah.

14 Q. Okay. Did you ever discuss your use of the
15 computer with her.
16 A. She was the one that told me to get on the
17 computer and do his project.
18 Q. Around the time that you first visited
19 Neverland, did you have a computer at home.
20 A. Well, Mr. Jackson had given Gavin a computer
21 on our first visit, when we got there.
22 Q. Did he take that computer home.
23 A. Yes, he did.
24 Q. Was the family using it at home.
25 A. Mainly Gavin would use it.
26 Q. Did anyone else use it.
27 A. Not that I remember.
28 Q. Did you ever use it. 923

1 A. No, not really. Just when I was seeing what
2 Gavin was doing. But not really.
3 Q. Was that the only computer you had at home.
4 A. Yes.
5 Q. Now, at some point, did Gavin take that
6 computer out of the home.
7 A. No. What happened was -- I don't know who
8 or what happened, that he had called saying that
9 the -- something was messing up with it. So he sent
10 it to Mr. Jackson's people, and we never got it
11 back.
12 Q. Okay. And your mother used to complain
13 about that, right.
14 A. About what.
15 Q. Not getting the computer back.
16 A. Not that I remember. I don't know.
17 Q. And she used to complain about not getting
18 the car back, right.
19 A. I don't remember. I don't know.
20 Q. You never heard her do that.
21 A. I don't know.
22 Q. Well, you said yesterday at some point the
23 car didn't work, right.
24 A. Yes.
25 Q. And it went back to Neverland, you thought,
26 right.
27 A. I just knew that somebody came and picked it
28 up. I didn't know where it went. 924

1 Q. Your mother used to complain about that,
2 didn't she.
3 A. Complain about what.
4 Q. The fact that it was her car at that point.
5 A. No, it wasn't her car. We still called it

6 Gavin's car.
7 THE COURT: Counsel.
8 MR. MESEREAU: Yes.
9 THE COURT: Break time.
10 MR. MESEREAU: Oh.
11 (Recess taken.)
12 MR. SANGER: Your Honor, does the Court have
13 the right button on there for "PC".
14 THE COURT: There's two inputs, either 1 or 4.
15 THE BAILIFF: Input 1.
16 THE COURT: That's 1; and that's 4. 1 is for
17 the PC, I'm told. Anything that goes through the
18 PC, I push 1; and any other media, I would push 4.
19 MR. SANGER: 4.
20 THE COURT: Is there some other subject you
21 could cover. We've got less than an hour, and they
22 could have that ready for you Monday morning on the
23 tape.
24 MR. MESEREAU: I could do that.
25 THE COURT: Can you.
26 MR. MESEREAU: Sure.
27 THE COURT: Let's try that.
28 MR. MESEREAU: May I ask how long it might 925

1 take. Because I'd love to end the day with this, if
2 I can.
3 THE COURT: Yes.
4 MR. MESEREAU: I think -- we're not sure how
5 long it would take. So I could move on, if you'd
6 like.
7 THE COURT: I think it would be a better use
8 of time than -- he's working under a great deal of
9 pressure with all of us watching him.
10 MR. SANGER: The watched pot phenomenon.
11 THE COURT: We work better when we're all
12 calm and sure.
13 THE BAILIFF: Can we try using that one.
14 Take that one out and use that one.
15 MR. SANGER: I think you need to go to 4,
16 then, for this; is that right.
17 MR. MESEREAU: I think we're ready to go,
18 Your Honor.
19 THE COURT: All right. We'll go.
20 Q. BY MR. MESEREAU: Ms. Arvizo, you testified
21 yesterday that you went into the arcade area at
22 Neverland one time.
23 A. Yes.
24 Q. A juke box was moved and you went into a
25 wine cellar, correct.
26 A. No, I had saw some people going down in the
27 staircase, so I just followed.
28 Q. Okay. And you've testified that you saw 926

1 Michael Jackson pouring wine, correct.
2 A. Yes.
3 Q. You said that Michael Jackson gave you a
4 glass of wine to drink, right.
5 A. Yes.
6 Q. And you said it tasted --
7 A. Funny.
8 Q. Funny.
9 A. Yes.
10 Q. You didn't want to drink it, right.
11 A. I only took a couple of sips, yes.
12 Q. Okay. Do you remember you were interviewed
13 by the Santa Barbara Sheriff's Department July 6th,
14 2003, and asked questions about that.
15 A. I know I was asked questions about it, yes.
16 Q. You were asked by a Santa Barbara sheriff
17 how you knew it was wine, right.
18 A. Yes.
19 Q. And your answer was, you knew it was wine
20 because it's a wine cellar and there's nothing else
21 to be drinking in a wine cellar, right.
22 A. Yes, there is wine bottles along the left
23 wall.
24 Q. Never told them you had seen Michael Jackson
25 pouring wine from any bottle, correct.
26 A. They never asked me that question, but I did
27 see him.
28 Q. Well, they asked you how you knew it was 927

1 wine, and your answer was, "They were in a wine
2 cellar and there's nothing else to be drinking in a
3 wine cellar," correct.
4 A. I'm not going to grab a cup off the counter.
5 It was handed to me.
6 Q. Well, why didn't you tell that to the Santa
7 Barbara sheriffs then.
8 A. They didn't ask me about it.
9 Q. Well, they actually did. Would it refresh
10 your recollection to show you the police report.
11 A. I just told them about the building. And
12 they said how did I know it was wine. Because it
13 was a wine cellar.
14 Q. But yesterday, you said you saw Michael
15 Jackson pouring a bottle of wine into a cup, true.
16 A. Yes.
17 Q. That's not what you told the sheriffs on
18 that day, right.
19 A. Well, I was in a wine cellar also. I didn't
20 know I had to say every little detail. I was young

21 back then. I didn't know I had to say every little
22 detail for it to be right. Different things come
23 up.
24 Q. Okay. On that particular day, you never
25 said you saw Michael Jackson pouring wine and you
26 never even told them that he gave you wine, right.
27 MR. SNEDDON: I'm going to object as
28 argumentative and asked and answered. 928

1 THE COURT: Sustained.
2 Q. BY MR. MESEREAU: Did someone tell you that
3 when the defense lawyer asks you questions in court,
4 if you've got a problem, to say, "I was very young
5 and I just don't remember".
6 A. No, that's -- I have no way of knowing,
7 because it was years ago. I was very young.
8 Q. Did you ever use that stock phrase in
9 answering any of the prosecutor's questions.
10 A. I don't know. Maybe I did; maybe I didn't.
11 I don't know.
12 Q. Now, nobody told you that, when in trouble
13 or when in doubt, that's what you say.
14 A. Nobody told me what to say. When I say it,
15 it's from me.
16 Q. Okay. You mentioned that, at one point, you
17 drove to The Laugh Factory on Sunset, right.
18 A. Yes.
19 Q. And The Laugh Factory is on a corner on
20 Sunset in Los Angeles, right.
21 A. Yes.
22 Q. You've been there many times, right.
23 A. Yes.
24 Q. And you said you met a lawyer at The Laugh
25 Factory, right.
26 A. I didn't know who he was. I just saw -- I
27 just was introduced that he was Bill. I just ran up
28 there real quick to give my mom the message that 929

1 Vinnie had given me. I didn't know who he was.
2 Q. But correct me if I'm wrong, you were in a
3 car, you drive to The Laugh Factory, right. Your
4 mom gets out, right.
5 A. Yes.
6 Q. She goes into The Laugh Factory, right.
7 A. Her and Gavin go in together and Vinnie
8 asked us to stay.
9 Q. And they see a civil lawyer in there, right.
10 A. I didn't know who he was at that point.
11 Q. But you do know now, right.
12 A. I still kind of really don't know.

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13 Q. Well, you've had meetings with him.
14 A. I know he's a lawyer, but I don't know.
15 Q. How many times have you met with him.
16 A. Once.
17 Q. And when was that, approximately.
18 A. I don't remember.
19 Q. Well, let me ask you this: Your mother went
20 into The Laugh Factory and met with Jamie Masada and
21 a lawyer named Dickerman, right.
22 A. I just saw him there. I didn't know he was
23 a lawyer at that point.
24 Q. And to your knowledge, your mother never
25 complained that anybody's being falsely imprisoned
26 or abused or told what to say or restrained or
27 anything.
28 A. You got to ask her. I don't know. 930

1 Q. Have you ever discussed what she said to
2 that lawyer with her.
3 A. I don't know.
4 MR. SNEDDON: Your Honor, I'm going to
5 object to that question. Lack of foundation. And
6 also, it could be a violation of attorney-client
7 privilege.
8 MR. MESEREAU: Your Honor, that privilege
9 was waived a long time ago.
10 MR. SNEDDON: No, it wasn't.
11 THE COURT: I'll allow the question.
12 Actually, there is -- the question and the answer
13 was given before the objection. The question was,
14 "Have you ever discussed what she said to that
15 lawyer with her."
16 "Answer: I don't know."
17 Next question.
18 Q. BY MR. MESEREAU: To your knowledge, when
19 your mother and Gavin got out of the car, went into
20 The Laugh Factory, saw a lawyer, saw Jamie Masada,
21 they never complained that anyone was being held
22 against their will, to your knowledge, right.
23 A. All I knew is that they were going in to see
24 Jamie Masada. I walked in, saw Bill, Mr. Masada, my
25 mom and Gavin sitting there, and I gave my mom the
26 message Vinnie had given me, and I walked right out.
27 I don't know what they said. I don't know what
28 happened. 931

1 Q. And you've never, to this day, discussed
2 with your mother what was said.
3 A. No.
4 Q. But since that day, you've met with this

5 lawyer named Dickerman, right.
6 A. Once, yes.
7 Q. To your knowledge, has your mother had a lot
8 of meetings with Dickerman.
9 A. I don't know.
10 Q. You don't know. You have never discussed it
11 with her.
12 A. No.
13 Q. All right. Okay. After that meeting was
14 over, did your mother and Gavin come out of The
15 Laugh Factory.
16 A. About five minutes after I had ran in and
17 given them the message from Vinnie.
18 Q. How long had they been in The Laugh Factory,
19 if you really know.
20 A. Before Vinnie started getting impatient,
21 about 15 minutes or so. I don't know.
22 Q. And where did you go after they got back in
23 the car, after they were in The Laugh Factory.
24 A. I don't remember whether we went back to
25 Neverland or to Calabasas. I don't remember.
26 Q. But it was one of the two, right.
27 A. Yeah.
28 Q. All right. And your stay at the Calabasas 932

1 Inn was about two days, right.
2 A. I don't remember how long it was.
3 Q. Okay. Did you ever tell someone named
4 Simone that your mother wanted to go to Brazil.
5 A. I've never told anybody. I don't remember
6 that person.
7 Q. Did you ever tell someone named Rio that
8 your mother wanted to go to Brazil, but your
9 brothers didn't want to go.
10 A. I never -- I don't know who that person is.
11 MR. MESEREAU: Your Honor, at this point
12 we'd like to play the Brad Miller taped interview.
13 THE COURT: All right.
14 MR. MESEREAU: Can we mark it as next in
15 order.
16 THE COURT: It's just an audiotape, right.
17 MR. MESEREAU: Yes, it is, Your Honor. We
18 need to mark it next in order.
19 THE COURT: It's not marked.
20 MR. SANGER: It's in the machine. If we can
21 mark it when we take it out.
22 THE CLERK: It would be Defense Exhibit 5000.
23 MR. MESEREAU: Okay.
24 THE COURT: That's what their exhibits start
25 with.
26 THE CLERK: Yes.
27 MR. MESEREAU: We'll see if it works, Your

1 MR. SNEDDON: For the record, I have no
2 objection. I'll waive the foundation.
3 THE COURT: Thank you.
4 (Whereupon, a portion of an audiotape,
5 Defendant's Exhibit 5000, was played for the Court
6 and jury.)
7 MR. MESEREAU: I don't think that's going to
8 work.
9 It's not working. It's not working.
10 MR. SANGER: It was working here, but we
11 couldn't get it through the wires to the --
12 THE COURT: Well, you can work with the
13 technician after court and play it Monday.
14 MR. SANGER: We can do that. Thank you,
15 Your Honor.
16 Q. BY MR. MESEREAU: You left Jay Jackson's and
17 you went to The Laugh Factory, right.
18 A. I don't know what you're talking about. I
19 don't remember.
20 Q. When you left Jay Jackson's after the
21 tape-recorded statement, did you go to Neverland or
22 The Laugh Factory.
23 A. I think that's the point I went to The Laugh
24 Factory. I'm not sure.
25 Q. Okay. Did you leave Major Jay Jackson at
26 his residence.
27 A. Yeah.
28 Q. Did Vinnie pick you up at Major Jay 934

1 Jackson's home.
2 A. I think it was Vinnie. Because Vinnie's the
3 one that brought us to The Laugh Factory, but I'm
4 not sure. But I know he was the one that took us to
5 The Laugh Factory.
6 Q. Okay. Did Vinnie take you to Hamid
7 Moslehi's home as well.
8 A. No. It was Hamid that came and picked us up
9 at Neverland.
10 Q. What kind of car did Vinnie drive.
11 A. They had the -- it's like a silver Buick. I
12 think it was a Buick. I'm not sure.
13 Q. Do you remember when you went to get a
14 passport.
15 A. I kind of do, but I know we went to, like,
16 an office-type place, but --
17 Q. Well, it was a federal building, wasn't it.
18 A. Yeah.
19 Q. And that was in Los Angeles, right.

20 A. Yes, it was.
21 Q. And Vinnie drove you; is that correct.
22 A. Yes. Yes, it is.
23 Q. And he parked the car somewhere near the
24 federal building, right.
25 A. I guess, yeah.
26 Q. And you were with your mom, right.
27 A. Yeah, we were all together.
28 Q. With Gavin and Star, right. 935

1 A. Yes.
2 Q. You parked your car, and all of you got out
3 of the car and walked into the federal building,
4 right.
5 A. Yes.
6 Q. Did you ever hear anybody scream, "Help,
7 we're being held against our will," or words to that
8 effect.
9 A. No.
10 Q. There were federal employees and agents all
11 over that building, right.
12 A. Yeah.
13 Q. And nobody said a word, right.
14 A. Yeah. They're that scary.
15 Q. Your mother came up with the idea of calling
16 Michael Jackson "Daddy," right.
17 A. No.
18 Q. You testified yesterday that your mother
19 never came out of the cottage, right.
20 A. Yes.
21 Q. And that's not true, is it.
22 A. That is true.
23 Q. Your mother was in the theater from time to
24 time, was she not.
25 A. No.
26 Q. You were never in the theater with your
27 mother and your brothers watching a film at
28 Neverland. 936

1 A. On the first visit, I think we went and all
2 saw something. That was the very first visit of --
3 with David and everything. But other than that, I
4 don't remember us going in the theater.
5 Q. Do you remember the time you, your mother,
6 Gavin and Star and Michael Jackson were in the
7 theater and your mother asked everyone to "kneel
8 down and say a prayer to Daddy".
9 A. I don't remember that.
10 Q. Do you ever remember being in the theater at
11 Neverland with your mother, Gavin, Star and Michael

12 Jackson.
13 A. I don't remember that.
14 Q. Do you ever remember being with your mother
15 at this zoo at Neverland.
16 A. On the very, very first visit when we all
17 came up together with David, we did go to the zoo.
18 Q. Are you saying that, after that, your mother
19 never left her cottage.
20 A. My mom didn't leave her cottage.
21 Q. Were her meals served at the cottage, to
22 your knowledge.
23 A. Yes, they were brought to her.
24 Q. Three times a day.
25 A. I think it's -- I don't know. I wasn't
26 watching.
27 Q. Do you remember, your mother told the three
28 social workers from the Los Angeles Department of 937

1 Children & Family Services that she's always at the
2 main residence.

3 A. Yeah.

4 Q. Remember, she told those workers that she's
5 there all times of day.

6 A. Yeah.

7 Q. Do you think your mother was lying.

8 A. Yes.

9 Q. Do you think your mother lied throughout
10 that interview.

11 A. Somewhat. I don't know. But I know those
12 comments can't be true.

13 Q. And that was the day you lied about bringing
14 girlfriends to Neverland, right.

15 A. Yeah.

16 Q. And you're telling this jury that you've
17 never brought any girlfriend to Neverland.

18 A. No.

19 Q. But you told it to the Los Angeles
20 Department of Children & Family Services.

21 A. Yes, I did.

22 Q. Did you discuss with your mother ahead of
23 time that you were going to tell those social
24 workers that you bring your girlfriend to Neverland.

25 A. Not that I remember, no.

26 Q. You don't remember ever talking to your mom
27 about what you were going to say.

28 A. Not that I remember, no. 938

1 Q. Okay. Were you in the room when your mother
2 told her lies to the social workers.

3 A. I don't know if it was all lies. I don't

4 know. I don't remember what was said.
5 Q. But you remember some of them were lies,
6 correct.
7 A. Yeah, I remember -- when you tell me certain
8 things, I do remember.
9 Q. Okay. Now, at some point, you learned your
10 mother didn't want to go to Brazil, right.
11 A. She didn't want to go to Brazil at all.
12 Q. Well, at some point, you learned that you
13 weren't going to Brazil, right.
14 A. My mom didn't want to go at all.
15 Q. I know you're saying that.
16 A. When that subject was brought up.
17 Q. And your position is, that you've never told
18 any other witness that your mother wanted to go to
19 Brazil, but your brothers wanted to stay, right.
20 A. My brothers wanted to stay and be with
21 Michael, yes.
22 Q. At some point, instead of going to Brazil,
23 your entire family was brought home, right.
24 A. Yes.
25 Q. And who brought them home.
26 A. I think it was Vinnie that brought us all
27 back to my grandmother's house.
28 Q. So Vinnie drove you to your grandmother's 939

1 house and dropped the family off, right.
2 A. Yes, because we had to make up -- my mom
3 called me and said vaguely, "Your grandfather's
4 sick. You need to come home. Davellin, get your
5 stuff together, it's time to go." And she just --
6 you could tell she just wanted to get us out of
7 there.
8 Q. And when you went to leave, Vinnie took you
9 to your grandparents, right.
10 A. Well, they were kind of irritated about the
11 whole fact we had asked them over and over, and they
12 finally agreed to it.
13 Q. I know what you're saying. But the reality
14 is, when you wanted to leave, you went home, right.
15 A. After a hassle, yes, we did.
16 Q. And when you asked Jesus Salas on an earlier
17 date to take you to Los Angeles in the middle of the
18 night, he did it, right.
19 A. Yeah, we had to do it very quiet, and we had
20 to be very quiet.
21 Q. I know your position. Have you discussed
22 what words you're going to say about this event with
23 anybody before today.
24 A. No, these are my feelings. This is what I
25 saw happening.
26 Q. Okay. Okay. You testified yesterday that

27 when you were in Michael Jackson's bedroom, you saw
28 alcohol, right. 940

1 A. Yes, I did.

2 Q. You said, "I know the shape of bottles, but

3 I don't know what they were," right.

4 A. Yeah.

5 Q. And you never tasted what was in those

6 bottles, correct.

7 A. No, I just saw that they were there in the

8 bedroom.

9 Q. Okay. You never said Mr. Jackson gave you

10 anything that was in those bottles, right.

11 A. Not while in the bedroom, no.

12 Q. Okay. What else did you see in Mr.

13 Jackson's room that only time you say you were

14 there.

15 A. Other than what I've already said.

16 Q. Yes.

17 A. I don't remember anything else.

18 Q. Remember any pictures on the walls.

19 A. I don't remember.

20 Q. Any toys in the room.

21 A. Don't remember.

22 Q. Do you know where his children were at that

23 point.

24 A. I think they were there at the beginning,

25 but then the nannies came and got them. I'm not

26 sure about that.

27 Q. Okay. Did you see nannies in the main house

28 at that point. 941

1 A. When I was --

2 MR. SNEDDON: Excuse me, Your Honor, I'm

3 going to object as to what "that point" is as vague.

4 MR. MESEREAU: Sure.

5 THE COURT: Sustained.

6 MR. MESEREAU: I'll rephrase it, Your Honor.

7 Q. When you went to Mr. Jackson's bedroom for

8 the only time you say you were ever there, you saw

9 nannies, correct.

10 A. When they came and got them.

11 Q. Did you ever see the room the nannies live

12 in.

13 A. I don't remember.

14 Q. Did you meet the nannies at Neverland.

15 A. I met -- I had met Grace the first time we

16 had went, with David and everybody. But I met the

17 second nanny at Miami.

18 Q. Two nannies, right.

19 A. Yes.
20 Q. Same nannies you saw at Neverland when you
21 were in Michael's room, right.
22 A. Yes.
23 Q. Have you ever told anyone that you were in
24 Michael's room more than once.
25 A. No.
26 Q. You testified when you were at the Calabasas
27 Inn, you went shopping, right.
28 A. Yes. 942

1 Q. Where did you go shopping.
2 A. For the suitcases, we went to an outlet
3 mall. And then for the clothes, we went to like a
4 mall-mall.
5 Q. And you went to a number of stores in the
6 mall where you bought clothes, right.
7 A. No, we just went to one department store.
8 That's all I remember.
9 Q. Do you recall anyone in that department
10 store saying words to the effect, "Help, we're being
11 restrained or held against our will."
12 A. No, none of us said that. Vinnie was with
13 us the whole time.
14 Q. You said you went to a -- was it a
15 Walgreen's where you had a photo taken.
16 A. Yes, we did.
17 Q. Where was that Walgreen's located, if you
18 know.
19 A. Near Calabasas, I guess. It was when we
20 were at Calabasas.
21 Q. When you went into the Walgreen's, do you
22 recall anybody saying words to the effect, "Help,
23 we're being held against our will".
24 A. No.
25 Q. Okay. Do you recall security personnel in
26 any of those malls.
27 A. I don't remember.
28 Q. Do you recall security personnel in 943

1 Walgreen's.
2 A. I don't think so.
3 Q. Do you recall security personnel in the
4 store you went and bought clothes at.
5 A. There was -- I don't remember seeing any.
6 Q. Where did you eat that day when you were
7 shopping; do you know.
8 A. I don't remember.
9 Q. It was not at the hotel, right.
10 A. I think there was the one time he took us to

11 eat somewhere. I don't remember.
12 Q. But you certainly don't recall your mom or
13 anybody telling anybody at the restaurant, "Help us,
14 we're being restrained or held against our will,"
15 right.
16 A. No, I don't.
17 Q. Okay. How long were you in Walgreen's; do
18 you know.
19 A. 20 minutes.
20 Q. And you had your photo taken.
21 A. All of us did.
22 Q. Okay. Have you ever discussed the J.C.
23 Penney case with your dad.
24 A. Which dad. My stepfather or David.
25 Q. David.
26 A. No.
27 Q. Never talked to him about it at all.
28 A. No. 944

1 Q. And I think I asked you this earlier. If I
2 did, I apologize. You never discussed the J.C.
3 Penney case with Gavin or your mom, right.
4 A. None of them.
5 Q. Okay. Ever see your mom, during the J.C.
6 Penney case, ask your brothers to write out what
7 happened and then go over it with them.
8 A. No. The only -- the only writing I saw was
9 David would sit at the kitchen table and write, but
10 that's the only writing that I saw.
11 Q. Never saw your mother do it.
12 A. Never saw her write anything.
13 Q. Was David writing about what happened at
14 J.C. Penney.
15 A. I don't know what he was writing, but I
16 think that he liked to do notes or whatever. I
17 don't know.
18 Q. But why do you remember that when I
19 mentioned J.C. Penney.
20 A. Because that's -- that's the only notes that
21 I remember.
22 Q. About J.C. Penney.
23 A. Yeah.
24 Q. So you remember David writing notes about
25 J.C. Penney.
26 A. Yeah.
27 Q. Do you remember what he did with those
28 notes. 945

1 A. I don't know. I guess he was just reviewing
2 what he thought or what happened to him or whatever.

3 I don't know what he was writing about, really. But
4 I know that he would write a lot.
5 Q. About J.C. Penney, right.
6 A. I guess so. You have to ask him. I don't
7 know what he was writing.
8 Q. But clearly, if this jogs your memory a
9 little bit, it must have been the time of that case
10 you saw David writing things out.
11 A. Yeah. He's not really good with --
12 memory-wise, so I don't know. You'll have to ask
13 him.
14 Q. Okay. Did you see David talking to your mom
15 about what he was writing.
16 A. I don't remember what happened. I was too
17 young to remember. And all I remember about that
18 case is Gavin's elbow, and we came and picked him
19 up. He was hurting and Star's head was hurting.
20 That's all I remember. I wasn't involved in that
21 case at all.
22 Q. Okay. Okay. Do you recall your mom saying
23 that David's brother Ray will have people killed.
24 A. David had said that.
25 Q. Pardon me.
26 A. David had told me that.
27 Q. Well, have you ever told people that your
28 mom talked about that. 946

1 A. No. David was the one that told that to me.
2 Q. Okay. Told you that he had a brother Ray
3 that can have people killed.
4 A. Well, I know he has a brother Ray, and David
5 always said, "Oh, my brother has connections," and
6 stuff like that. And when he held me in that car
7 that time, that's when he told me all those threats
8 and stuff.
9 Q. But your mom's never discussed it, to your
10 knowledge.
11 A. No, she --
12 Q. Never talked about it.
13 A. No.
14 Q. Okay. Did you ever see your mom dancing on
15 the premises at Neverland.
16 A. No, not that I remember. She was always in
17 her room.
18 Q. So she'd stay in her room for days and days,
19 right.
20 A. Which visit are you talking about.
21 Q. How about any visit.
22 A. The only visit that I really saw her come
23 out was the first visit. And after that, the other
24 visit, she never really came out.
25 Q. Do you know anything about your mother

26 wanting to set up an account -- a bank account for
27 the money that was raised in the fund-raisers.
28 A. All I know, Gavin had a trust fund. That's 947

1 all I know about it.

2 Q. Okay. And how did you learn about that.

3 A. I just heard about it. I don't know.

4 Q. Your mom told you she was setting up a trust
5 fund, right.

6 A. I don't know. All I know is Gavin had a
7 trust fund. I don't know who set it up or what,
8 because David and my mom were still together.

9 Q. Okay. Did you ever tell Fritz Coleman you
10 wanted him to help raise money.

11 A. I don't -- I've never asked anybody for
12 money.

13 Q. Okay. Let me just ask you if you know some
14 people. Do you know any of the employees at
15 Neverland.

16 A. On just a hi/bye basis, yeah.

17 Q. Ever meet any of the employees at Neverland.

18 A. Just a hi and bye.

19 Q. I'm sorry.

20 A. Just a hi and bye and --

21 Q. So you don't know any of their names.

22 A. No, I just remember how they look.

23 Q. Okay. Do you know Arlene Kennedy.

24 A. Yes.

25 Q. Who was Arlene Kennedy.

26 A. She was the owner of the dance studio that
27 we went to.

28 Q. When did you last talk to her; do you know. 948

1 A. A while ago. I don't remember.

2 Q. Do you remember your mother telling Mrs.

3 Kennedy that the press were causing havoc after the
4 Bashir documentary.

5 A. I don't remember. I know they were, but I
6 don't remember if she told her or not.

7 Q. Okay. Your mother constantly complained
8 about the press causing problems after Bashir,
9 right.

10 A. Well, they'd mainly go to my grandparents'
11 house. Only one person came to the East L.A.
12 apartment. And my grandparents are old and just --
13 she just wanted to protect them and not have them go
14 through that.

15 Q. But you just said the press was causing
16 havoc, right.

17 A. Yeah, at my grandparents' house. That's

18 where they would go.
19 Q. But your mother always complained about the
20 press causing problems, after Bashir, for your
21 family, right.
22 A. Well, they are family. Those are my
23 grandparents.
24 Q. No, your mother was complaining about what
25 the press was trying to do to you and Gavin and Star
26 and she, right.
27 MR. SNEDDON: Your Honor, I'm going to
28 object as vague as to when and where; lack of 949

1 foundation.
2 MR. MESEREAU: Sure. I thought I said after
3 the Bashir --
4 MR. SNEDDON: Well, that's wide open.
5 MR. MESEREAU: I'll rephrase it, Your Honor.
6 THE COURT: All right.
7 Q. BY MR. MESEREAU: Shortly after the Bashir
8 documentary, your family was hassled by media, true.
9 A. Just one came to the East L.A. apartment
10 where we were at. The rest were constantly going to
11 my grandparents' house.
12 Q. Now, it sounds like you've memorized that
13 answer, because you've said the same identical
14 answer so many times.
15 MR. SNEDDON: Object as argumentative. Ask
16 that be stricken.
17 THE COURT: Sustained as argumentative.
18 MR. MESEREAU: I'll withdraw it.
19 Q. After the Bashir documentary, is it true
20 that your mother spoke to a lot of people in your
21 presence and complained about the media.
22 A. Yes. The media that was going to my
23 grandparents' house. That's where my mom's, like,
24 driver's license and everything is registered at.
25 Q. After the Bashir documentary, didn't your
26 mother constantly complain about the way Gavin was
27 hassled.
28 A. One reporter -- okay, one -- there were two 950

1 of them together, but it was one that came to the
2 East L.A. apartment. The rest were going to my
3 grandparents' house. That's all I remember.
4 THE COURT: Just a moment. You're not
5 listening to the question. He's not asking you what
6 happened. He's asking you about a complaint.
7 Would you read the question back to her.
8 (Record read.)
9 THE WITNESS: No. Only one came to the

10 apartment, and I don't know.
11 THE COURT: Just -- no, just answer the
12 question.
13 THE WITNESS: No.
14 Q. BY MR. MESEREAU: Did you go over that
15 answer with anyone before you testified today.
16 A. No.
17 Q. Did you -- in your meeting with Mr. Sneddon,
18 did you talk about what your response to that
19 question was going to be.
20 A. No, we didn't talk about that.
21 Q. Did anyone tell you to memorize that answer
22 and just repeat it every time you were asked that
23 question.
24 A. No.
25 Q. You'd agree that whenever you're asked that
26 question, the same identical words come out.
27 MR. SNEDDON: I'm going to object, and ask
28 that be stricken and counsel be admonished. This is 951

1 like the fourth time within the last five minutes.
2 MR. MESEREAU: I'll withdraw it.
3 MR. SNEDDON: I'll order -- ask that the
4 jury be ordered to disregard the statement of
5 counsel.
6 THE COURT: The objection is sustained.
7 You're admonished not to argue with the witness.
8 MR. MESEREAU: Yes, sir.
9 Q. You said George Lopez was a close friend of
10 your family, correct.
11 A. Yes.
12 Q. And when did you last see George Lopez.
13 A. It was during Gavin's cancer, because
14 David's the one that demolished that relationship.
15 Q. Did you meet with him a number of times.
16 A. He would go to the hospital and visit Gavin.
17 Q. And were you there when he visited Gavin.
18 A. Yes, he would bring him, like, a little toy
19 car and stuff.
20 Q. Did you ever see him at The Laugh Factory.
21 A. Yes.
22 Q. How many times, if you can estimate.
23 A. We saw him much -- he was the one that was
24 our personal one that they had chosen for us, to
25 teach us how to do our little comedy acts.
26 Q. Did he teach you and your brothers how to do
27 comedy routines.
28 A. While we were at The Laugh Factory, yes. 952

1 Q. Was he part of the class you took there.

2 A. Yes.
3 Q. At some time, your father had a falling out
4 with George Lopez, right.
5 A. What do you mean by that. Like the
6 relationship was gone.
7 Q. Yes.
8 A. Well, because of David's fault, yes.
9 Q. Okay. At some point, your mother accused
10 George Lopez of stealing 300 bucks from Gavin,
11 right.
12 A. No.
13 Q. Did you ever hear anything about that.
14 A. No. I never heard anything like that.
15 Q. Well, you certainly heard something about
16 why the relationship ended --
17 A. Yes.
18 Q. -- right.
19 And you're blaming that all on David, right.
20 A. Yes. Because he went and he argued with
21 George.
22 Q. Do you know what he argued about.
23 A. All I know is it was an open event, and he
24 went to argue with George about -- I don't know what
25 it was about. And after that, George didn't -- told
26 him he didn't want to see him ever again.
27 Q. After that event, did George ever see your
28 mother, you, Gavin or Star again. 953

1 A. He didn't come and see us anymore.
2 Q. Did you try to reach him.
3 A. No. David had told us that George didn't
4 want to see us anymore.
5 Q. Okay. Do you know someone named Brett
6 Ratner.
7 A. Yes.
8 Q. Who is Brett Ratner.
9 A. He was the director for Rush Hour 2.
10 Q. Where did you meet him.
11 A. On the set of Rush Hour 2.
12 Q. Did Chris Tucker introduce you to him.
13 A. Yes, he did.
14 Q. Did you get to know him pretty well.
15 A. Somewhat. Not really.
16 Q. Were you ever at his house.
17 A. No.
18 Q. Did you ever hang out with him anyplace.
19 A. No.
20 Q. Did you ever see him off the set of Rush
21 Hour.
22 A. Well, Chris took us to like -- like a
23 restaurant they were at. And we just sat with them
24 for like a couple minutes, and then I think we went

25 back to our hotel room.
26 Q. When did you last see him.
27 A. I don't remember.
28 Q. Did you ever see Gavin talking to Brett 954

1 Ratner.
2 A. While they were on the set, yeah. They
3 would play with each other and laugh and stuff.
4 Q. Now, getting back to your comments that you
5 saw a change in your brother at some point.
6 Remember those comments you made in response to the
7 prosecutor's questions.
8 A. Yes.
9 Q. Do you have any knowledge of an event where
10 Gavin --
11 THE COURT: They can't hear you now.
12 THE BAILIFF: You have your book on the
13 microphone. You turned it off.
14 MR. MESEREAU: Oh, the book's on the....
15 Q. Do you recall an event where your brother
16 Gavin shot your mother with a BB gun.
17 A. Yes, I do. He shot me also.
18 Q. When did that happen.
19 A. That was after we came back from -- after we
20 left Neverland for good.
21 Q. Okay. And he took a BB gun and shot the two
22 of you.
23 A. Yes, he did. He was always -- from the
24 point that he left Neverland, he had changed
25 dramatically into an aggressive person.
26 Q. But he never was aggressive in school before
27 he had gone to Neverland, is that what you're
28 saying. 955

1 A. No, he never got into fights and stuff at
2 school, not that I remember. He was just very
3 talkative.
4 Q. But he was thrown out, wasn't he.
5 A. No, he was never thrown out of school.
6 Q. Was he ever thrown out of class, to your
7 knowledge.
8 A. I don't know.
9 Q. You don't know.
10 A. Gavin had never been aggressive to me and my
11 mom before.
12 Q. Are you aware of your brothers, Star and
13 Gavin, ever being caught in the wine cellar at
14 Neverland alone.
15 A. No. They were always with Michael.
16 Q. How do you know that.

17 A. Because that's -- I never saw them anywhere
18 by themselves. If I did see them, they were with
19 him.
20 Q. Didn't you say that you didn't hang out with
21 them at Neverland.
22 A. Yeah, but I would go around the ranch. And
23 every time that I saw them passing by, or I would go
24 in a room that they were, like, in the office or
25 anything, they were with him.
26 Q. Did you ever learn that Gavin and Star were
27 caught breaking into the wine cellar at Neverland
28 without Michael Jackson anywhere in sight. 956

1 A. No, I never heard of that.
2 Q. Did you ever learn that Gavin and Star were
3 caught with alcohol at other parts of Neverland
4 without Michael Jackson ever being there.
5 A. Not that -- I never heard of that ever.
6 Q. Never heard of that at all.
7 A. No.
8 Q. Okay.
9 (Off-the-record discussion held at counsel
10 table.)
11 THE COURT: I can tell it's late Friday
12 afternoon. Can't you.
13 Let me have counsel approach for a second.
14 MR. SNEDDON: May I go this way, Your Honor.
15 THE COURT: Yes.
16 (Off-the-record discussion held at sidebar.)
17 THE COURT: We've had a very serious
18 conference here. We're going to quit ten minutes
19 early. I can -- I can tell when things are going
20 downhill.
21 (Laughter.)
22 Let me remind you, you know, the
23 admonishment applies every day, every minute. But
24 we're going -- we've gone through a long week here,
25 and now we're going to go through a weekend. And
26 it's extremely important that you keep in mind that
27 you don't talk to anybody about the case or anything
28 related to the case, don't watch news reports or 957

1 listen to television, none of that.
2 Remember the admonition. It's extremely
3 important. People are watching you. You know,
4 you're -- people in the community are watching you.
5 And it's just -- just so important that you follow
6 this admonition.
7 And another important admonition is don't
8 form any opinions about this case until you've heard

9 all the evidence, you've heard the instructions of
10 the law, and you've had an opportunity to hear
11 counsel argue their -- how they think the facts and
12 the law come together for your judgment.
13 If you reach the judgment before all of that
14 happens, you would be short-changing one side or the
15 other, or both sides. Certainly the system of
16 justice. So let's keep an open mind, and I'll see
17 you Monday at 8:30.
18 One final thing. I'm announcing now that
19 the grand jury transcript is unsealed.
20 And Lorna, that has to be in the minutes.
21 THE CLERK: All right.
22 (The proceedings adjourned at 2:20 p.m.)
23 --oOo--
24
25
26
27
28 958

1 REPORTER'S CERTIFICATE

2

3

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 785 through 958

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 4, 2005, and thereafter

19 reduced to typewriting by computer-aided

20 transcription under my direction.

21 DATED: Santa Maria, California,

22 March 4, 2005.

23

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25

26

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

28 OFFICIAL COURT REPORTER 959